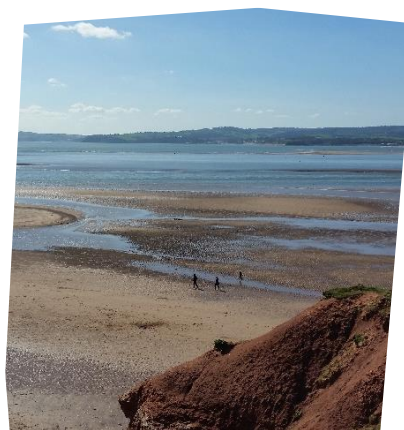




East Devon Local Plan 2020 to 2040

Preferred Options Reg. 18
Consultation Draft Plan
Current draft - autumn 2022



Draft Local Plan text

The Draft Local Plan text, under Regulation 18 of the plan making regulations, will initially go to Strategic Planning Committee on 4 October 2022 with a recommendation (subject to minor further refinement – see below) for public consultation. With the expectation of minor amendments, the intention is that the plan will come back to committee on 1 November 2022 with:

- Text and policy to address new town proposals, we are waiting on further evidence reports to inform policy;
- Changes to allow updating where other evidence is still to be completed – specifically including the Economic Development Needs Assessment;
- Minor corrections noted in response to errors in the 4 October draft and in some cases minor redrafting to address such matters as consistency of approach;
- Layout, formatting and presentation changes to make the document more visually attractive.
- Changes that may be required following decisions taken at meetings of this same committee on 29 September and 4 October (these meetings are held after this draft plan is completed);
- Any changes to the plan made by committee on the 7 October 2022.

Policies Map

The draft plan (written text) will be accompanied by a Policies Map. Where written policies in the plan specifically refer to considerations applying to defined areas, and policy defines these areas (including allocations for development), they will be shown on the Policies Map. A draft Policies Map, just showing boundaries applicable at towns and villages and for the west side of East Devon, will come to committee on 7 October. In refined format the mapping will come back to committee on 7 November.

Version Control – this version

Version 03 – dated: September 2022

In this draft of the plan some notes, comments and queries are highlighted in yellow text. These will need addressing in the version of the plan that goes to committee on the 1 November 2022.

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1. Chapter 1 – Introduction, evidence and policies

What the plan is and its production timetable?

- 1.1. The primary role of the local plan will be to guide and inform decisions on where development will take place in East Devon. The Local Plan will be the key ‘turn to’ document that is used in determining planning applications.
- 1.2. This plan is a draft of what we believe the final plan should look like and we are making it available for anyone to comment on. Consultation is scheduled to run from **insert dates once agreed**. Under the legal rules of local plan making this stage of work falls under Regulation 18 of the plan making regulations.
- 1.3. We will take the comments received from the consultation and add these to further assessment and evidence gathering that we are undertaking. We may also undertake some further detailed consultation work on specific parts of the plan (still under Regulation 18 of the plan making rules) at a later date. From the plan consultation and other work we will produce a full revised version of the plan. The intent is that the revised version of the plan will be made available for public comment in Autumn 2023 and then the revised plan (its technical term is the ‘Publication Plan’ and it will fall under Regulation 19 of the plan making regulations), comments received on it and other material will be sent to the Planning Inspectorate. A Planning Inspector will undertake a formal examination of the plan and if and when they find it to be sound the plan can be adopted by the Council, we hope this will be in 2024.
- 1.4. The intent is that the East Devon Local Plan will cover the period from 1 April 2020 to the 31 March 2040. Government policy is that plans need to have an end date of at least 15 years from the date of plan adoption.

Evidence to support the plan

- 1.5. This plan is supported by a number of studies and evidence reports and we will continue gathering evidence to inform refinement of the plan after this phase of consultation work is undertaken. Consultation feedback will be part of the evidence we will draw on to help with amendments to the plan.
- 1.6. We will also be producing a report called a sustainability appraisal (SA) that will accompany the draft plan (and later drafts of the plan) and it will be available for public comment at the same time as the draft plan.
- 1.7. We have established an evidence library on our web site – **work will be undertaken on creating this library so it is ready for when the plan goes out for consultation.**

- 1.8. Future key evidence work will include the commissioning of a whole plan viability assessment. This assessment will consider the financial development values and returns that might be generated from development schemes to determine whether proposed planning policy can be implemented. In simplified terms it will place a commercial cost against contributions sought under plan policy (for example to pay for such matters as affordable housing or biodiversity improvements) to determine if the levels or provision we are seeking are credible given the commercial value that any development scheme may deliver. We have not yet undertaken the assessment work but in later drafts of the plan the work will help refine policy options and choices.

Policies of the draft local plan

- 1.9. The local plan needs to have actual policies that are used in determining planning applications. In this draft plan we show policies in green highlighted boxes. In some cases policies offer suggested finished wording and in other cases we set out our broad approach that proposed policy will take, where, for example, we need to undertake further evidence gathering.

The policies map

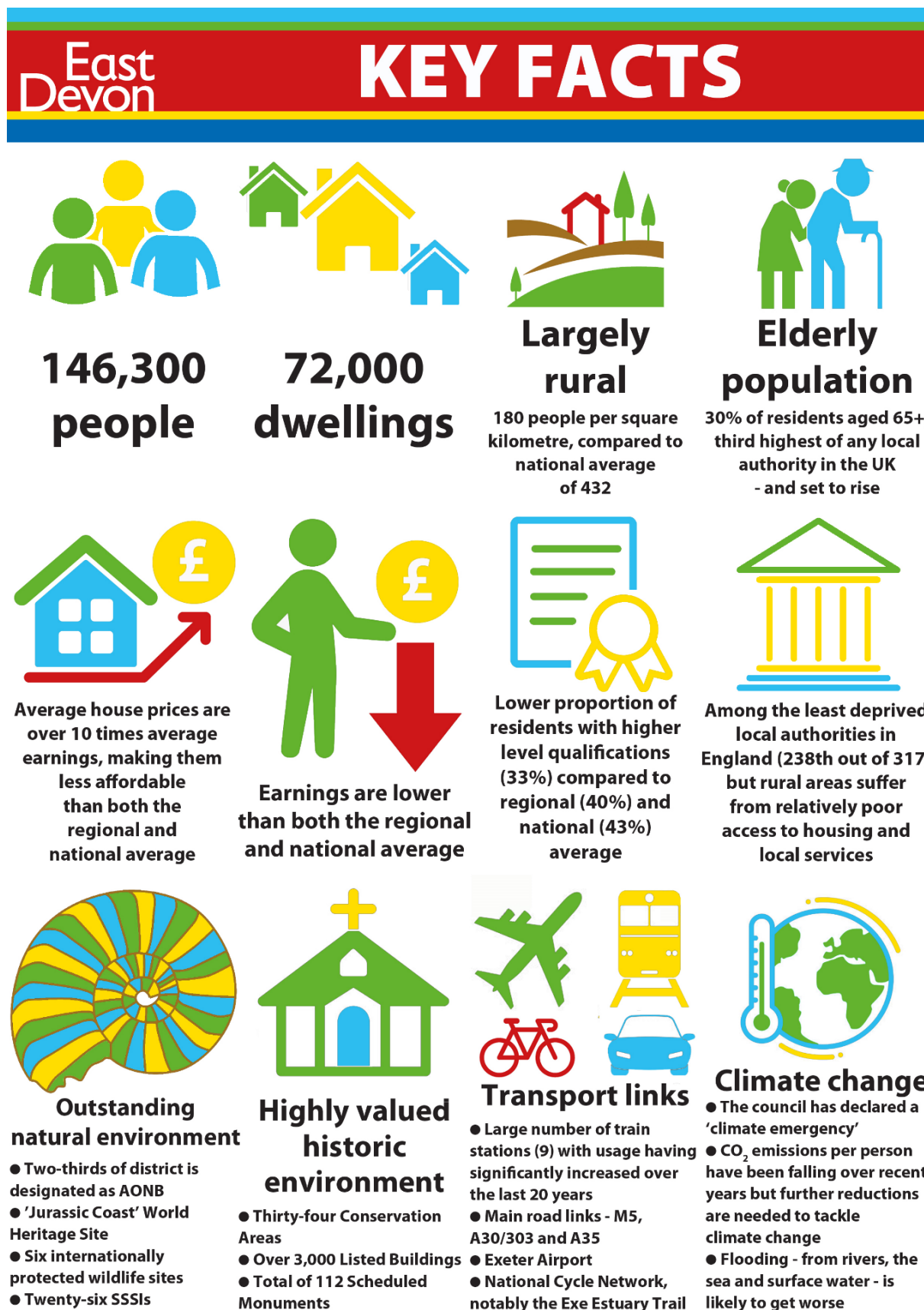
- 1.10. Some policies in the local plan apply to the whole of East Devon or to differing broad types of areas, references will be made in policy wording. However, there are also some policies that very specifically apply to precise boundaries or areas shown on a map. The map we use is called a Policies Map and it will be referred to in policies to show where spatially defined policies will apply.
- 1.11. Amongst the boundaries shown on the maps are areas of land that we identify as suitable for development. We call these land areas for development allocations.

Strategic policies and non-strategic policies

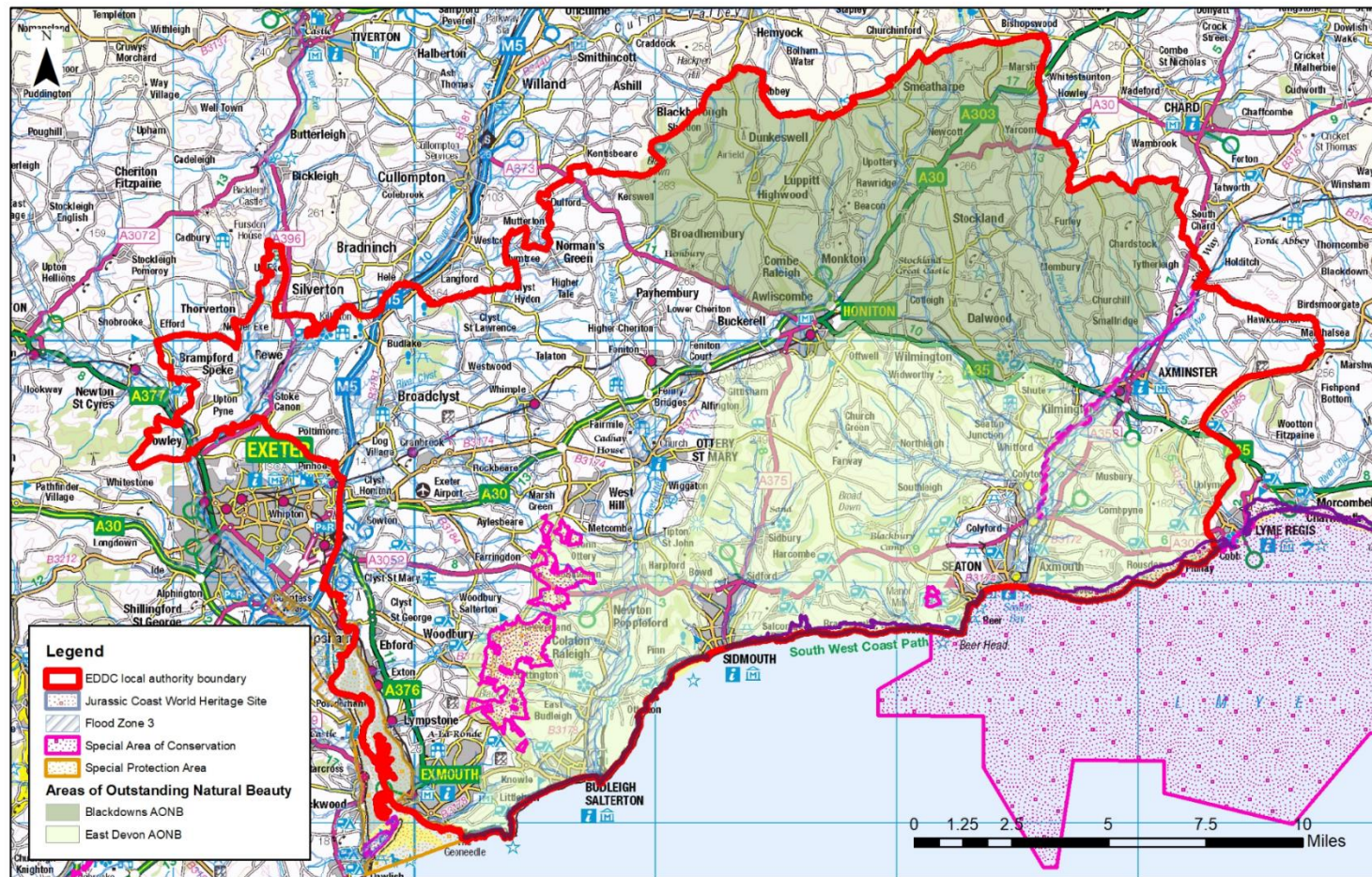
- 1.12. In the plan we have differentiated between Strategic Policies and non-strategic policies. The Government, in their National Planning Policy Framework, advises of the need for such a differentiation.
- 1.13. **Strategic Policies** – set out the overarching approach and deal with major subject matters that are of fundamental importance to decision making or which set a general tone.
- 1.14. **Non-strategic policies** – will typically add an extra layer of detail to inform decision making.

- 1.15. Strategic policies are denoted with the word 'Strategic' in the title and all other policies are non-strategic. Neighbourhood Plans and their policies can supersede non-strategic policies but they cannot supersede strategic policies.

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East Devon proposed consultation draft Local Plan – October 2022



For the consultation plan we will seek to replace this map with a much simpler and more attractive one that shows East Devon in the context of the wider region/UK.

2. Chapter 2 - Vision and objectives

- 1.16. The vision for the local plan is drawn directly from the new Council Plan as endorsed by East Devon District Council on the 20 October 2021.
- 1.17. The Council Plan sets out the strategic direction of the council and priorities and actions to guide the effective use of all council resources. Although the Council Plan looks into the future for a far shorter time period than the new local plan it is of strategic overarching importance for Council work and is therefore seen as appropriate to set the agenda for local plan work.
- 1.18. Drawing directly from the Council Plan the local plan vision is:

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

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

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

A Resilient Economy bringing prosperity to the district.

- 1.19. From this vision and expanding on this to draw out other themes in the Council Plan a series of objectives have been defined.
- 1.20. The plan objectives set a framework for the chapters and specifically the plan policies that follow. The objectives are not in a priority order or ranking and no one carries any more or less weight than any other.

Designing for health and well-being	Objective 1	To encourage healthy lifestyles and living environments for all East Devon residents.
Tackling the climate emergency	Objective 2	To ensure all new development moves the district towards delivering net-zero carbon emissions by 2040 and that we adapt to the impacts of climate change.
Meeting future housing needs	Objective 3	To provide high quality new homes to meet people's needs.
Supporting jobs and the economy	Objective 4	To support business investment and job creation opportunities within East Devon and support a resilient economy.
Promoting vibrant town centres	Objective 5	To promote the vitality of our town centres, encourage investment, greater flexibility and a wider range of activities to increase footfall and spend.

Designing beautiful and healthy spaces and buildings	Objective 6	To promote high quality beautiful development that is designed and constructed to meet 21 st century needs.
Our outstanding built heritage	Objective 7	To conserve and enhance our outstanding built heritage.
Our outstanding natural environment	Objective 8	To protect and enhance our outstanding natural environment and support an increase in biodiversity.
Promoting sustainable transport	Objective 9	To prioritise walking, cycling and public transport and make provision for charging electric vehicles
Connections and infrastructure	Objective 10	To secure infrastructure needs at an appropriate time to support new development
Supporting sustainable and thriving villages	Objective 11	To help support villages and protect and enhance facilities and services they offer.

3. Chapter 3 - The spatial strategy

Introduction

- 1.21. The spatial strategy of the local plan is concerned with establishing an overarching picture of the amounts, types and distribution of future development that will be accommodated in East Devon. We set out an overarching strategic policy that addresses these matters.

1. Strategic Policy – Spatial Strategy

New development will be directed towards the most sustainable locations in East Devon, consistent with the spatial strategy to:

- Focus new development on the western side of the district, including a new settlement and other major strategic development close to Exeter
- Promote significant development at the Principal Centre of Exmouth and the Main Centres of Axminster, Honiton, Ottery St Mary, Seaton, and Sidmouth to serve their own needs and that of the wider surrounding areas
- Support development at the Local Centres of Broadclyst, Budleigh Salterton, Colyton, Lympstone, and Woodbury that meets local needs and those in the immediate surroundings
- Allow limited development to meet local needs at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill and Whimple.

Settlements not listed above are considered to be 'open countryside' for the purposes of the Local Plan, where more restrictive planning policies apply.

Justification for inclusion of the policy

- 1.22. The Local Plan should promote a sustainable pattern of development that seeks to align growth and infrastructure; and strategic policies should set out an

overall strategy for the pattern, scale and design quality of places.¹ Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This helps to reduce congestion and carbon dioxide emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport will vary between urban and rural areas.²

- 1.23. In rural areas, which form large parts of East Devon, national policy states that housing should be located where it will enhance or maintain the vitality of rural communities; and policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.³
- 1.24. A key part of the spatial strategy is to outline the settlement hierarchy, grouping settlements together where they share similar characteristics and placing them in different tiers. Settlements with a higher population and a greater range of jobs, community facilities and services serving a wide area are placed at the top of the settlement hierarchy; whilst smaller settlements that have fewer jobs and facilities perform a more local, but still important, role are grouped lower down the hierarchy. Evidence in 'The Role and Function of Settlements' considers these factors.⁴
- 1.25. Exmouth has a significantly higher population, number of jobs, and level of community services and facilities that distinguish it as the 'principal centre' in East Devon. The six 'main centres' benefit from a range of jobs along with strategic and local facilities, serving both the settlement and wider surrounding area – in Cranbrook's case some of these facilities are planned to be delivered in the coming years. The five 'local centres' perform an important local role, with reasonable levels of population and jobs; and a smaller selection of strategic facilities alongside all or most local facilities. A further 23 settlements have a relatively good range of local facilities either in the settlement or nearby, and are 'service villages' for both the settlement and immediate surrounding rural area. For the purposes of the Local Plan, all other settlements are considered to be 'open countryside' where more restrictive planning policies apply. Nevertheless, development can come forward in these places in certain circumstances, such as rural exception sites, community-led development (for example through a neighbourhood plan), and rural workers dwellings.

¹ National Planning Policy Framework, 2021, paragraph 11a, 20a: [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/91721/nppf-2021.pdf)

² National Planning Policy Framework, 2021, paragraph 105.

³ National Planning Policy Framework, 2021, paragraph 79.

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

- 1.26. Despite being a Main Centre, Cranbrook is not addressed in this local plan as a Cranbrook specific plan was adopted in autumn 2022 and the Cranbrook Plan will oversee its development until this local plan and the Cranbrook Plan are superseded by a new plan or plans that will be produced, probably in the late 2020s or early 2030s.

2. Strategic Policy – Housing distribution

New housing will be distributed across East Devon in accordance with the table below. The housing numbers are gross and relate to the period 2020 to 2040, apart from the new town where there is a longer term vision that takes into account the likely timescale for delivery.

Settlement	Completions 2020-22	Commitments	Allocations	Total
Western side	841	1,800	7,250	9,891 (plus 5,500 post 2040)
<i>New town</i>	<i>0</i>	<i>0</i>	<i>2,500 plus 5,500 after the year 2040</i>	<i>2,500 rising to 8,000</i>
<i>North of Topsham</i>	<i>0</i>	<i>0</i>	<i>580</i>	<i>580</i>
<i>Cranbrook</i>	<i>543</i>	<i>801</i>	<i>4,170 (allocated in Cranbrook Plan)</i>	<i>5,514</i>
<i>North of Blackhorse</i>	<i>298</i>	<i>999</i>	<i>0</i>	<i>1,297</i>
Principal Centre	269	654	287	1,210
<i>Exmouth</i>	<i>269</i>	<i>654</i>	<i>287</i>	<i>1,210</i>
Main Centres	422	905	1,490	2,817
<i>Axminster</i>	<i>111</i>	<i>209</i>	<i>745</i>	<i>1065</i>
<i>Honiton</i>	<i>167</i>	<i>272</i>	<i>182</i>	<i>621</i>
<i>Ottery St Mary</i>	<i>80</i>	<i>37</i>	<i>248</i>	<i>365</i>
<i>Seaton</i>	<i>32</i>	<i>216</i>	<i>147</i>	<i>395</i>
<i>Sidmouth</i>	<i>32</i>	<i>171</i>	<i>168</i>	<i>371</i>
Local Centres	70	160	572	802
<i>Broadclyst</i>	<i>0</i>	<i>3</i>	<i>175</i>	<i>178</i>
<i>Budleigh Salterton</i>	<i>39</i>	<i>56</i>	<i>20</i>	<i>115</i>
<i>Colyton</i>	<i>19</i>	<i>79</i>	<i>25</i>	<i>123</i>
<i>Lympstone</i>	<i>8</i>	<i>10</i>	<i>197</i>	<i>215</i>
<i>Woodbury</i>	<i>4</i>	<i>12</i>	<i>155</i>	<i>171</i>
Service Villages	252	549	421	1,222

<i>Beer</i>	1	43	0	44
<i>Branscombe</i>	0	0	0	0
<i>Broadhembury</i>	0	0	0	0
<i>Chardstock</i>	0	0	30	30
<i>Clyst St Mary</i>	2	12	72	86
<i>Dunkeswell</i>	2	6	43	51
<i>East Budleigh</i>	2	7	0	9
<i>Exton</i>	4	1	50	55
<i>Feniton</i>	13	9	42	64
<i>Hawkchurch</i>	1	0	38	39
<i>Kilminster</i>	1	1	47	49
<i>Musbury</i>	0	16	15	31
<i>Newton Poppleford</i>	6	15	0	21
<i>Otterton</i>	14	3	0	17
<i>Payhembury</i>	0	0	0	0
<i>Plymtree</i>	1	2	0	3
<i>Sidbury</i>	0	0	0	0
<i>Stoke Canon</i>	4	0	0	4
<i>Tipton St John</i>	5	0	0	5
<i>Uplyme</i>	3	7	0	10
<i>Westclyst</i>	188	421	0	609
<i>West Hill</i>	5	3	51	59
<i>Whimble</i>	0	3	33	36
Countryside	99	335	0	434
Grand total	1,953	4,403	10,020	16,376 (plus 5,500 post 2040)

Justification for inclusion of the policy

- 1.27. Much of the western side of East Devon has seen considerable levels of development in recent years. This general pattern of development is set to continue through existing commitments to development and also through proposals in this Local Plan.
- 1.28. Over the plan period of 2020 to 2040 the western side of East Devon, close to the city of Exeter, will see roughly half of all new homes built with the other half across the rest of East Devon.
- 1.29. In this new plan we are also proposing relatively large amounts of growth and development in and around the Principal Centre and Main Centres, with lower levels of development typically at Local Centres and Service Villages. Village growth is primarily geared towards meeting more local needs and seeking to make these settlements more self-sustaining, as set out in Strategy 1. The

outstanding open countryside and coastal qualities that characterise much of our District will be protected by ensuring development is only allowed in these areas in limited, locally justified circumstances.

- 1.30. The distribution strategy responds to the environmental constraints that exist over many of the eastern parts of East Devon. Western parts of East Devon, as you get closer to the city of Exeter, are typically far less constrained. The western side of the District has seen strong market demand, both for housing and new employment opportunities and jobs growth and there are also high levels of jobs and services and facilities in Exeter itself. These strong functional links between the western side of East Devon and Exeter reinforce the logic for new development close to the City boundary.
- 1.31. A spatial representation of the distribution of future development, a key diagram, is shown on the map below.

In the consultation plan we will show a diagrammatic map that shows the spatial distribution of development and also some key things like main roads and railways and AONB boundaries etc.

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Levels of future housing provision

- 1.32. 'Delivering a sufficient supply of homes' is an NPPF policy theme. The NPPF requires Local Plans to identify and meet as a minimum the objectively assessed development needs for their area. The purpose of this strategic policy is to set out what the housing development requirements are for East Devon for the plan period. This is central to the council's 'plan, monitor and manage' approach to housing development.

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3. Strategic Policy - Levels of future housing development

The Local Planning Authority will plan, monitor and manage the delivery of housing development in accordance with the spatial strategy and the site allocations set out in this plan, and other adopted or made Development Plan Documents in the district. Housing provision will be made for at least 18,920 dwellings (net) to be delivered in the plan area in the plan period 1 April 2020 to 31 March 2040, whereby:

- i. At least 4,070 (net) new homes should be affordable; and
- ii. At least 14,850 (net) should be market housing.

The annualised district housing requirement for 5-year housing land supply and housing trajectory purposes will be 946 dwellings per year (net). The housing trajectory will be illustrated in Appendix XX and the 5-year land supply forecast at the anticipated point of plan adoption will be set out in Appendix YY.

Provision will be made for a supply headroom of approximately 10% to provide housing supply flexibility in the district in the plan period. For the avoidance of doubt, this does not uplift the net housing provision requirement in this policy.

The Local Planning Authority will balance the aspiration to maximise the delivery of residential development on previously developed land with:

- i. The need to maintain housing supply; and
- ii. This plan's policies for other development to deliver the plan objectives and spatial strategy.

Provision will be made in the district for approximately XX% of housing supply over the plan period to be met on small and medium sized sites.

To meet the affordable housing requirement, provision will be made in the district over the plan period for a mix of affordable housing types to be delivered through development in accordance with Policies 37 and 38.

To support the Plan objectives and delivery of the housing requirement, the Local Planning Authority will monitor and manage housing development in accordance with the monitoring framework and contingency measures. The following housing supply sources for C3 (Residential Dwellings) units and C2 (Residential Institutions) unit equivalents will count towards meeting the housing provision requirement:

- i. Completions
- ii. Planning commitments from planning approvals
- iii. Local Plan allocations
- iv. Cranbrook Plan allocations
- v. Windfalls and Neighbourhood Plan allocations

Policy will set out the housing provision requirements for designated neighbourhood areas in East Devon as follows:

Designated Neighbourhood Areas	Housing Provision Requirement in the DNA 2020 to 2040*
All Saints, Axminster, Axmouth; Aylesbeare, Beer, Bishops Clyst, Broadclyst, Broadhembury, Budleigh Salterton, Chardstock, Clyst Honiton, Clyst St George, Colyton, Cotleigh, Dalwood, Dunkeswell, East Budleigh and Bicton, Exmouth, Farringdon, Feniton, Hawkchurch, Honiton, Kilminster, Luppitt, Lypstone, Membury, Monkton, Newton Poppleford and Harpford, Otterton, Ottery St Mary and West Hill, Payhembury, Rockbeare, Seaton, Sidmouth(Sid Valley), Stockland, Uplyme, Upottery, Whimble, Woodbury, Yarcombe	TABLE TO BE COMPLETED following consultation on the methodology for identifying the scale of housing provision requirement in Designated Neighbourhood Areas
<p>Notes:</p> <p>* or time period to be specified.</p> <p>9. Where it is not possible to provide a requirement figure for a neighbourhood area, the Local Planning Authority will provide an indicative figure, if requested to do so by the neighbourhood planning body.</p>	

Justification for inclusion of policy

- 1.33. The local plan aligns with the Council Plan's expressed priority for robust policy in the local plan to address the need for more and better-quality homes and communities for all. The Council Plan does not determine how much housing growth will be planned for in the district. It is the role of the local plan to determine the amount of housing development in the plan period in East Devon. The plan does this through a policy on the levels of future housing development, covering total provision for the plan period and breaking down that provision.
- 1.34. We see it as key that the local plan quantifies the actual overall levels of house building that will be provided in East Devon through plan policy.
- 1.35. Government policy is that the local plan should establish the amount of housing provision by including a strategic policy to set a housing requirement figure for the whole plan area for the plan period. This policy is therefore identified as a Strategic Policy that would enable the local plan to fulfil this role and express the council's commitment to the level of housing growth to be provided for in the plan period.

- 1.36. The amount of housing provision is established in line with the presumption in favour of sustainable development as it applies to plan-making. This is so that a sufficient amount and variety of land can come forward where it is needed. The policy is consistent with and helps to deliver the local plan's vision and objectives. It aligns with the overall spatial strategy. Through housing delivery, it supports the economic vision and strategy underpinning the plan.
- 1.37. The policy makes sufficient provision for housing (including affordable housing) to meet objectively assessed housing need. Setting this out as a minimum net housing requirement over the plan period for the whole plan area is in line with the NPPF. In doing so, the policy aligns with and supports the Government's objective for 'significantly boosting the supply of homes' as set out in NPPF

In summary

- 1.38. The policy requirement for provision of at least 18,920 dwellings in the district in the plan period is justified by evidence of local housing need based on the Standard Method, using the latest ONS statistics. To be sufficiently flexible and provide 'headroom', forecast supply in East Devon should be 10% above that figure. That equates to about 20,800 dwellings. At this time, we forecast that there is potential to deliver 21,514 dwellings in the plan period from the supply categories we count towards meeting the requirement plus headroom.
- 1.39. The affordable housing requirement of 4,070 dwellings is justified by the latest evidence of affordable housing need, and there are realistic prospects of delivery with potential supply forecast for about 3,870 affordable dwellings in the plan period. Affordable housing delivered on Rural Exceptions sites, First Homes Exception Sites and Neighbourhood Plan allocations would add to this.
- 1.40. These conclusions depend on sites being allocated in the local plan and a reality check is needed, through the forthcoming overall local plan viability assessment. Plan making will keep these matters under review.
- 1.41. The illustrative housing trajectory and 5-year supply analysis will be included in the plan when the relevant evidence is available. Likewise, the percentage of housing on small and medium sized sites will be identified to inform the Publication Plan.
- 1.42. This proposed scale and mix of housing is largely driven by Government policy and guidance aimed at boosting housing growth. To be found sound the policy must be consistent with Government planning policy. Nevertheless, the Council must still justify the policy approach and its details.
- 1.43. The policy relies on substantial and complex evidence which the Council uses to justify the policy content. We are aware that the amount and type of evidence can be overwhelming. Even a concise, non-technical outline explanation of its use to justify the policy may be off-putting for some readers. However, it is

essential that there is full opportunity at this consultation stage to ensure that the explanation of the policy is part of the consultation process.

- 1.44. The Council intends to produce a Housing Need, Requirement and Supply topic paper as an audit trail document for the Publication Plan stage. This will provide a detailed narrative showing how the Council takes account of national policy and uses evidence to justify this local plan policy. It will signpost the relevant information in the documents which provide the evidence and highlight the conclusions which the Council relies on to justify the policy's content.
- 1.45. To foster greater engagement with plan-making at this stage we have limited the reasoned justification text for this policy in this draft plan to just the strategic headlines. We've explained more fully how we justify this policy in a separate technical evidence document – The 2022 Housing Need, Supply and Requirement Interim Topic Paper. That document is part of this consultation stage. It is available at [insert consultation link] and we invite comments on those explanations at this consultation stage.
- 1.46. The supporting text of a policy consists of a reasoned justification and any descriptive or explanatory material for the policy. At the Publication Plan stage, it will be necessary for the plan to include the reasoned justification specific to the clauses in this policy. The Council expects that this will focus on justifying:
- The level of housing provision requirement for East Devon for the plan period and the use of evidence, including:
 - The level of East Devon Local Housing Need; and
 - Our forecast of housing supply and whether this is sufficient to meet the housing requirement
 - The annualised housing requirement
 - The supply headroom
 - The approach to use of previously developed land for housing
 - The percentage of housing on small and medium sized sites
 - The approach to monitoring and 5-year land supply
 - The affordable housing provision requirement for East Devon for the plan period and the use of evidence, including:
 - The level of East Devon Affordable Housing Need; and
 - Our forecast of affordable housing supply and whether this is sufficient to meet the affordable housing requirement
 - The housing requirements for Designated Neighbourhood Plan Areas.

Housing provision requirements in Designated Neighbourhood Areas

- 1.47. To date, through local plan production work, the Council has not received requests from any Neighbourhood Planning Group for a housing provision requirement figure for the Designated Neighbourhood Area. However,

Government policy requires that local plan policy sets out housing requirements for all Designated Neighbourhood Areas. There are currently 40 Designated Neighbourhood Areas in East Devon. The Council intends to consult on the methodology to be used to identify the appropriate level of housing requirements. This public consultation will be held prior to determining and justifying the housing requirements for each designated Neighbourhood Area to be set out in policy in the Publication Plan.

- 1.48. In line with Government policy, this strategic policy makes clear that the Local Planning Authority will provide an indicative figure when requested by the neighbourhood planning body, in those circumstances where it is not possible for the plan to provide a requirement figure. This would encompass Neighbourhood Areas that are designated after the Publication Plan is published.

Future employment provision in East Devon

- 1.49. The local plan's economic role is one of its three roles focused on achieving sustainable development. Through its economic role the plan contributes to building a resilient local economy aimed at providing economic prosperity for East Devon. It ensures that sufficient land of the right type is available in the right places and the right time to support growth, productivity and innovation. The plan identifies and coordinates development requirements to achieve this, including the provision of infrastructure.
- 1.50. The plan sets out the suite of preferred policies which together provide a clear economic vision and spatial economic development growth strategy for the District. They align with and support the spatial strategy and delivery of the plan's vision and objectives.
- 1.51. The two proposed strategic policies address the strategic employment priorities of the area and any relevant cross-boundary issues. The first covers the amount of employment development provision in the plan period and the distribution of employment development. The second identify strategic site allocations where employment development is part of mixed uses.
- 1.52. These strategic policies provide a clear basis for the non-strategic employment policies set out in Chapter 10. These will inform the determination of planning applications on employment and mixed-use development matters and will cover:
- Employment development in built-up areas and the countryside
 - Farm Diversification
 - Retention of employment sites and premises
 - Employment and Skills Statements
 - Provision and retention of rural services and facilities
 - Town Centres and shopping areas
 - Green tourism

- Visitor attractions

Preferred Option for the approach to economic growth

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

- 1.53. In this preferred approach, economic growth remains coupled with prosperity. This means that the drive to support innovation, greater productivity and investment to deliver economic growth, as measured by GDP/GVA, is also shaped by the opportunity to transform the economy through green and inclusive growth. It incorporates the concept of sustainable development regarding economic, social and environmental objectives, aligned with the NPPF.
- 1.54. The economic vision and spatial economic development growth strategy provide guidance to the local plan on the provision of employment land necessary to meet the economic growth opportunities, challenges and options faced by the District. This is distinct from other economic development activities such as inward investment promotion, business support and skills development which, though complementary, would be dealt with through separate work-streams within the District Council and in collaboration with partners.
- 1.55. The following statements set out the overarching elements of Economic Vision and Economic Strategy which, in combination, the detailed policies convey and support. They align with the plan's preferred approach to economic growth. These statements elaborate on and develop the Plan's overall vision for East Devon, and expand the strategic focus that directs the plan's policies and proposals.

Economic Vision

- 1.56. Our vision is to develop a resilient, competitive economy where local residents can access a choice of employment providing income comparable with national levels, and afford decent housing that meets their needs. Development will be concentrated at places where jobs and homes can be brought together to improve settlement self-containment. Supporting both established and emerging sectors, the Local Plan enables businesses to have the flexibility to transform and adapt to changing markets and harness new technologies. Strengthening residents' access to high quality education and training provision enables them to have the right skills to access new employment opportunities. Crucially, the

policies and proposals in the Plan support our working age population to live and work locally whilst aiding the recovery and transformation of the local economy to a green economy, focused on making a major contribution to the transition to a net zero economy.

Economic Strategy

We will achieve this vision through a spatial economic development growth strategy which:

- Creates conditions for a sustainable, inclusive and green economy delivering employment growth
- Secures high value and higher wage local employment, based on productivity
- Improves East Devon residents' access to employment

1.57. This will be achieved through:

- a. Securing and growing transformation sectors, fostering the transition to net zero, by
 - Supporting development of sectors that have a presence in East Devon or are attracted to the wider economic area of which East Devon is a part, and from which the East Devon economy and residents benefit
 - Making flexible provision for development that supports the introduction, expansion and relocation to East Devon of higher GVA sector businesses in identified transformational sectors, mindful of the expected benefits they should bring to the District through higher wages and skills development
- b. Retaining and supporting the existing mix of sectors in East Devon which create a resilient economy, including those that support community well-being
- c. Planning to meet identified employment needs in the plan period, quantifying the overall amount of employment development (business uses) provision and retail development provision, expressed as minimum policy requirements
- d. Providing the right land and premises in the right location to help businesses start, grow and flourish, by:
 - Identifying a range and choice of employment sites to meet need and providing sufficient flexibility to respond to changing economic circumstances,
 - Making provision for start-up and incubation space, at suitable places to attract and support new sectors utilising new technologies and encouraging research expertise to develop

- Identifying a new generation of strategic employment sites
 - Allocating sites and supporting the intensification and expansion of existing employment sites
 - Robust testing of the viability of new employment land allocations prior to allocation, to strengthen the likelihood of delivery and new employment
 - Relying on realistic delivery mechanisms, principally private investment but with public sector intervention where this is necessary and can be resourced
- e. Securing new employment space, mixed use development and targeted regeneration proposals that will result in greater self-containment of our market and coastal towns.
- f. Continuing to secure employment development opportunities in the western part of East Devon, reflecting that area's geographical advantages for business, including:
- Supporting the Exeter and East Devon Enterprise Zone designation through to its end date of 2042
 - Allocating more land to support the continued development and success of Exeter Science Park working in conjunction with partners including the City and County Councils and the University of Exeter
 - Making provision for the development of a smart and sustainable aviation cluster centred on Exeter Airport, utilising existing and enhanced facilities, enabling it to act as a test bed for future flight technology and to create new markets in maintenance/repair/overhaul, cargo handling and logistics
 - New communities, including Cranbrook employment and mixed use provision.
- g. Retaining employment sites that have good prospects of meeting future needs by:
- Safeguarding employment land allocations, supported by robust, effective mechanisms to deliver development, in order to reduce the demand for development in less sustainable, alternative locations
 - Ensuring that policy designed to safeguard valuable employment provision is robust and clearly expressed
- h. Ensuring policy makes clear the importance of maintaining adequate supply of employment land to meet the needs of business in the district.
- i. Ensuring policies seek to secure the timely delivery of new infrastructure to support new development and a growing population, and address potential barriers to investment, including:
- Enhanced digital connectivity and the roll out of ultra-fast broadband networks

- Making provision for increased, installed renewable energy capacity, to support decarbonisation of the grid and roll out of decentralised energy networks alongside smart grids, energy storage, hydrogen-based infrastructure, and new charging infrastructure
- j. Ensuring policies designed to provide flexibility for employment-led uses can support established sectors to adapt to changing markets, including our High Streets
- k. Sustaining and regenerating the town centres as priority areas for investment and for retaining retail and leisure spending in East Devon
- l. Making provision for the development of tourism accommodation, attractions and businesses appropriate to the environmental qualities of the area, which support a more diversified, green tourism sector that draws on the key strengths such as the food, drink and cultural offer, and retains spend in the area
- m. Supporting flourishing rural economies by
 - Focusing employment development at settlements where dwellings, services and facilities support the local labour supply
 - Ensuring that policy designed to enable land based sectors to diversify, supports future farming resilience and rural businesses' ability to adapt to agricultural transition, changing markets and regulations, whilst also being consistent with the spatial strategy and supporting the role of settlements
 - Ensuring that policy recognises the importance of supporting local supply chains and improving the resilience and flexibility of the rural economy to adapt to changing markets. This might include development of food grade premises for local food and drink producers to expand. Or, accommodating local creative industries and local health and well-being businesses whose products and services complement local tourism, and community support services. Traditional and new businesses add vitality, provided that their development is sympathetic to the rural location.
- n. Ensuring local residents are able to access and take up increased job opportunities in higher skilled and higher value occupations
- o. Maximising the opportunity for new residential and commercial development to enable enhanced local education and training, skills and employment provision.

Responding to challenges

- 1.58. The economic vision and strategy encapsulate the plan's response to the current challenges facing the local economy, and the long term challenges it is likely to face over the plan period and beyond. National and local policy is evolving in response to generational challenges such as the climate crisis,

biodiversity loss, technological change, low productivity and wage disparities, and a growing and ageing population. The Council Plan's priority for a resilient local economy is driven by these generational challenges but also by the economic shock of the pandemic and by national and global economic uncertainties.

- 1.59. Historically, East Devon has a rich heritage of production which brought wealth and supported the development of our market and coastal towns. This ranged from handmade lace and carpet making to limestone quarrying, farming and dairy produce.
- 1.60. Today, our economy is more diverse, spanning established sectors such as tourism and agriculture through to world leading climate and data science, advanced engineering and cutting edge science and technology. It is necessary to consider East Devon's role in the wider sub regional economy centred on Exeter, including its transformational sectors.
- 1.61. We continue to broaden local economic and employment opportunities and yet there is no part of our economy that has not been touched by the COVID-19 pandemic. The District lost its largest private sector employer (Flybe) in March 2020 and the Airport continues to rebuild from this. Structural challenges to our economy that existed prior to the pandemic also remain. East Devon is still an area where both resident and workplace wages are lower than regional and national averages whilst house prices are 12% higher than the England average, contributing to a worsening affordability gap.
- 1.62. We are experiencing a period of concerted economic change. There is a significant shift nationally and globally in the structure of employment, in response to generational challenges. As required by NPPF, the plan has had regard to the Heart of the South West Local Industrial Strategy (LIS) 2020. The LIS reflected contemporaneous government policy, set out in the UK Industrial Strategy 2017, and addressed the challenges of
 - Artificial intelligence and data revolution
 - Shift to clean growth
 - Shaping the future of mobility
 - Harnessing innovation to meet the needs of an ageing population
- 1.63. In March 2021 Government replaced the UK Industrial Strategy 2017 with its 'Build Back Better - Our Plan for Growth' 2021. This Command Paper continues a transformational approach towards tackling long term problems to deliver growth. It supports the transition to net zero carbon growth, but has a new focus on 'levelling up' and the Government's vision for 'Global Britain'. Nevertheless, the challenges identified in 2017 remain.
- 1.64. Together, these challenges also provide opportunities for the national and local economy to transform. New ways of working have emphasised the importance of adaptation and a reliance on digital connectivity in the District. The recent

increase in home-working due to the pandemic may become a permanent feature for some types of jobs. Work force expectations and needs are evolving. Artificial intelligence (AI) is expected to replace types of traditional jobs that are repetitive and can be systematised. The drive for greater productivity reduces the reliance on labour, but in turn this releases labour for employment in new sectors, if skills can be transferred, and training provided for the labour force to acquire new skills. New sectors are evolving. More flexibility enables new start-ups to grow on and mature. New types of employment requiring specialist workers are emerging. The changes have intensified the challenges experienced by our high streets.

- 1.65. Demand from future industries are expected to depend on new types of working environments, tailored to the industries' needs. There are new opportunities for people to reconnect with where they live, enjoy the outstanding environment and for businesses to access new markets through improved digital engagement. Developments such as Winslade Park are leading the way in terms of demonstrating the appeal of new models of living and working with an increased focus on wellbeing. The full impact and legacy of the pandemic in relation to demand for physical space such as for offices, logistics and retail continues to evolve, as does the impact on the labour market more widely.
- 1.66. Demand for supplies and services is expected to intensify, depending on the level of population growth and the needs of those people. Higher employment levels are needed to sustain the future population which is forecast to grow, and more jobs need to be accommodated locally in expanded or new communities. The plan will reference the new District employment forecasts (jobs-based) that underpin the local plan's employment provision policy, when they are available.
- 1.67. Linked to this, an increasing number of people are retiring to the District, increasing dependency on a shrinking workforce. In just 9 years from 2011 to 2020 we have seen our population of those over 65 grow by 22% while those aged between 16 to 24 have reduced by 6%. The stark reality is that we have seen a reduction in the working age population across more than half of the wards in East Devon. The balancing impact of new settlements cannot be underestimated as the same data shows our population of those 0 to 15 years increasing by 15% due to younger families moving into growth areas such as Cranbrook. As a District with such growing levels of economic inactivity in our older population, our Local Plan must enable the delivery of affordable housing for key workers and working age residents, to address growing issues about housing affordability in East Devon,
- 1.68. The impact of the pandemic has been particularly acute for certain age groups, places and sectors. The lowest paid have been badly affected and the Council has launched a Poverty Reduction Strategy to provide a comprehensive package of support to individuals and communities. Alongside our support to transformational sectors, if we are to transition to a higher wage economy, we must ensure that residents can access the right education and training to

develop the necessary knowledge and skills to access these new local opportunities.

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

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Policy for employment provision and distribution

- 1.70. In order to ensure there are good opportunities for people to gain jobs and for business to grow, thrive and prosper it is key for the local plan to ensure that there is a strategic approach to employment provision and distribution, especially in respect of making sure that land will be supplied.

4. Strategic Policy - Employment Provision and Distribution Strategy

The Council is committed to achieving high quality, high value jobs in East Devon, close to people's homes.

Provision is made for a net increase of at least xxxx ha of new employment floorspace within the plan period (1 April 2020 to 31 March 2040) to meet need and ensure that a choice of appropriate land is available in sufficient quantity, and of the right quality, to drive the economic growth of, and support prosperity in, East Devon.

Scale of Development

At least xxx sqm of E(g)(i) Offices are required. The town centres in the tier 1 and 2 settlements and the proposed new settlement will be the primary locations for new Class E office development

At least xxx sqm of B2 Industrial land is required. The majority of this provision will be met through site allocations.

At least xxx sqm of B8 Storage and distribution land is required. The majority of this provision will be met through site allocations.

E (g) (ii) R& D and E (g) (iii) industrial (which can be carried out in any residential area without causing detriment to the amenity of the area) will be provided on mixed use site allocations and as windfall development.

Other employment generating development, such as sustainable green rural tourism and leisure development will be permitted in accordance with other Plan Policies.

Location of Development

Existing employment areas that will continue to be the primary locations for industrial, warehousing, offices, distribution development and other B Class Uses are identified on the Proposals Map.

Sufficient additional employment land to meet East Devon's requirements will be identified:

- on the western side of the District, including the Exeter and East Devon Enterprise Zone, for high value uses, including those in transformational sectors.
- at the towns (Tiers 1 and 2 plus the new settlement in the Settlement Hierarchy) to provide jobs and workspace for new and existing residents, to improve settlement self-containment, and to reduce the need to commute to work.

In the Tier 3 and 4 settlements on mixed use sites, to provide small-scale jobs and workspace for new and existing residents, to improve settlement self-containment, and to reduce the need to commute to work.

The Council will monitor the achievement of employment development on existing commitments, from planning permissions and on site allocations in the development plan.

The scale of new windfall employment development will also be monitored, regarding its support for and consistency with the economic vision and strategy, and the plan's vision, objectives and spatial strategy.

Justification for inclusion of policy

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

provision for employment development. This means that the local plan should establish an employment provision requirement figure for the whole plan area for the plan period.

Forecast of employment needs

- 1.73. Unlike housing, the Government does not provide a standard methodology for assessing employment development need. However it requires the LPA to prepare a robust evidence base to understand business need through a Housing and Economic Needs Assessment (HENA). The 2019 PPG on HENAs provides guidance about the approach to take on Economic Development Needs Assessment (EDNA). PPG makes clear that EDNA evidence will help to provide an understanding of the underlying requirements for office, general business and distribution space, and (when compared with the overall stock of employment sites) can form the context for appraising individual sites. The EDNA will therefore forecast the need for land for offices, industry and warehousing. It doesn't specifically forecast need for development regarding other employment uses.
- 1.74. Previous evidence on need in the 2011 Housing and Employment Study informed the adopted Local Plan, but that evidence is now out of date. Likewise, evidence underpinning the Greater Exeter Economic Development Needs Assessment March 2017⁵ is out of date because of the Covid-19 pandemic, Brexit and evolving national economic and fiscal policy.
- 1.75. East Devon District Council together with Exeter, Mid Devon and Teignbridge Councils have commissioned consultants to undertake an updated Economic Development Needs Assessment (EDNA). It covers the Exeter Functional Economic Market Area (FEMA) which encompasses the four authorities' administrative areas. This recognises that East Devon is functionally part of a larger sub-regional economy.
- 1.76. The purpose of the EDNA is to objectively assess and evidence the need for economic development in each district during the period 2020 to 2040. It will be able to take account of latest national and local policy on Covid recovery and Build Back Better, and latest evidence on the state of the national and local economy. It will be informed by the latest available District level forecasts of growth in employment (jobs-based) for the plan period.
- 1.77. The task of the EDNA is to understand current and potential future requirements. Based on PPG 2019, it will assess the stock of employment land,

⁵ Greater Exeter Economic Development Needs Assessment March 2017
[https://devoncc.sharepoint.com/sites/PublicDocs/Planning/Planning/Forms/AllItems.aspx?id=%2Fsites%2FPublicDocs%2FPlanning%2FPlanning%2FGESP%2FEvidence%2FEDNA Final Report](https://devoncc.sharepoint.com/sites/PublicDocs/Planning/Planning/Forms/AllItems.aspx?id=%2Fsites%2FPublicDocs%2FPlanning%2FPlanning%2FGESP%2FEvidence%2FEDNA%20Final%20Report)

pattern of supply and loss, market demand, wider market signals and any evidence of market failure, in East Devon district. The EDNA will translate employment and output forecasts into related offices, industry and warehousing land need. Then by taking account of existing supply, it can identify any shortfall in supply compared to District need. It may highlight specific needs, such as providing a range modern good quality floorspace for one or more of the employment types, or in particular locations. It will consider the issue of providing sufficient supply flexibility to allow choice and enable businesses to respond swiftly to changing circumstances.

- 1.78. The results of the EDNA may identify potential shortfalls or surplus of employment land supply compared to need. It will be for the Councils to engage actively, constructively and in an on-going way to identify effective responses to resolve any strategic cross-boundary issues relating to meeting need, necessary to pass the Duty to Co-operate legal test.
- 1.79. The EDNA is expected to be available in time to inform the preparation of the Regulation 19 Publication Plan. The employment (jobs-based) forecasts will be available prior to the draft EDNA report, in time to inform the consultation on the Regulation 18 draft plan.

Employment land (or floorspace) supply

- 1.80. To meet the District's employment floorspace requirement, the Council will need to identify suitable sites that provide a realistic chance of delivery and provide for flexibility and choice. The EDNA assesses the existing supply and indication of any supply shortfall.
- 1.81. The Council needs to assess the quality and quantum of employment floorspace which could be delivered in the plan period to fill any forecast supply shortfall and allow for an appropriate degree of supply flexibility. This includes sites put forward through the HELAA call for sites. It also includes assessing whether any of the employment allocations in the adopted local plan but as yet undeveloped remain viable and attractive sites, and can be reallocated. The employment elements within the mixed use allocations in the Cranbrook plan have been tested recently at Examination.
- 1.82. Informed by the EDNA, the floorspace requirement identified in Policy 5, identifies the need for 'office' and 'industrial' and 'warehousing' employment uses. Policy reflects the latest national Use Classes Order (1st September 2020 and 2021). The UCO included a new E class combining commercial, business and services uses such as shops, financial and professional services, cafes, offices, research and development, clinics and health centres, day centres and gyms. Further changes to permitted permanent change were introduced in August 2021. Use Class E(g) has replaced the previous B1 Use Classes. Use Classes B2 (General Industry) and B8 (Storage and Distribution) remain.

- 1.83. This has impacted on local plan policies on employment, commercial and retail development. The change in use classes, is meant to provide a more flexible approach to uses such as industrial and storage and distribution operations. This can be beneficial allowing businesses to respond more swiftly to changing circumstances. Allocating sites for E(g), B2 and B8 class uses will need to consider which sites are suitable, depending on how similar the site requirements are, and the potential impact on the mix of uses and adjoining uses. Some uses such as general industry and warehousing/logistics generally cannot be carried out in a residential area without detriment to its amenity.

Distribution of employment development

- 1.84. The local plan determines how to balance the supply of employment land and floorspace across East Devon. To deliver the economic vision, the local plan will need to make new employment provision to meet the future needs of the District. The policy therefore addresses the distribution of additional employment provision across the District, focused on scale and type of employment allocations disaggregated to settlement categories.
- 1.85. The plan is an opportunity to support transformational sectors focused on emerging technology, building on the inherent strengths of this part of the District. The western side of the District contains particularly advantageous locations for businesses; not least proximity to concentrations of higher education, businesses, services, consumers and labour supply at Exeter, and the proximity of the M5 providing access to the strategic road network for transporting materials and products. The concentration of a range of employment sites in that location is a unique asset for the District. Not only can these sites accommodate new and expanding businesses. They also allow policy to place emphasis on providing high value jobs with particular focus on encouraging strategic inward investment and the transformational sector. The role of the Enterprise Zone is fundamental to the economic performance and well-being of the District. The Science Park is already positioned to attract knowledge based sectors, and to support new start-ups and the scaling up of businesses, with the potential to provide acceleration and innovation services for high tech firms.
- 1.86. The new settlements' locations and role are integral to supporting the economic strength of this part of the District. The role of Cranbrook regarding employment land provision is set out in the Cranbrook Plan DPD, and it is guided by the Cranbrook Economic Development Strategy. Further policy on employment development on the western side of East Devon is set out in the Policies in Chapter 6. For the avoidance of doubt, all the site allocations are intended to meet the identified East Devon employment need, being evidence by the EDNA.
- 1.87. Elsewhere in the District employment will mostly be geared to serving local needs with a view to securing jobs close to existing and proposed homes. These are locations where the demand for services is a key part of the

economy. Employment growth at existing settlements is essential to support them and to improve their self-containment. Through allocations, the plan provides opportunities to build on the economic links between settlements and businesses, with the potential to encourage the spin-out of higher value employment and new sectors to more of the District. This gives more people the option of not needing to commute long distances to work. On larger development allocations, new jobs will be required to be provided alongside new housing. Work is in progress to evidence the amount of employment, and how this relates to the scale of planned housing growth.

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

Mixed use - housing, employment and other uses sites

- 1.92. To help secure sustainable patterns and forms of development it is identified as essential that we secure some mixed use development where delivery of housing will also help secure employment uses and community and social

facilities. We have, therefore set out policy for such development and this relates to a number of allocations found within the plan.

5. Strategic Policy – Mixed use developments incorporating housing, employment and community facilities

In order to promote sustainable patterns of development we will require mixed use developments schemes in line with the requirements set out below:

For a new town and any development comprising of 100 homes or more, specifically including at Tier 1 and 2 settlements, including where land is allocated for development or on windfalls sites.

- We will require at least 0.4 hectares of employment land for each 100 homes proposed (with this ratio of provision applied on a pro-rata basis and applying for any homes numbering over 100); and
- We will require on-site social and community facilities in line with needs specifically generated by the development.

At tier 3 and 4 settlements or development in the countryside whether on allocated sites or windfall sites we will apply a threshold of 25 homes.

- We will require at least 0.1 hectares of employment land for each 25 homes proposed (with this ratio of provision applied on a pro-rata basis and applying for any homes numbering over 25),

Sites will be taken to comprise of proposed windfall developments and full allocations in the local plan and will not be restricted to separate plots of land irrespective of whether there is single or multiple ownership or control. This will resist the splitting of sites in order to come in below thresholds.

Planning permission will not be granted for residential development falling under the above unless at least one of the following apply:

- Specific employment only allocations at that settlement provide a quantum of employment land that exceeds the ratio of 0.25 hectares of employment land per 100 houses allocated (0.1 hectares per 25 homes) when taking into account firstly total quantum needs generated by the level of housing allocations proposed for a settlement in the local plan and in addition to this the quantum needs generated by the proposed scheme.
- It can be clearly demonstrated that off-site provision of employment land at a settlement and at a quantum to meet or exceed above thresholds, will be delivered and is better located to meet needs.
- The nature of the housing being proposed (for example elderly person housing) will not generate the need for employment provision.
- The site, by way of non-typical characteristics or clear constraints, is wholly unsuited to provide for employment needs.

Exceptionally, if sufficient viability or other evidence may be provided which precludes the delivery of necessary employment provision within mixed use sites. Developers

will be required to make a financial contribution to the Council to support the off-site delivery of a sufficient and comparable degree of employment provision. The Council will use these developer contributions to help deliver Council-owned employment land elsewhere in the district, and where possible, within commuting proximity to the application site. The methodology for calculating this contribution is to be determined. A Viability Statement and verifiable assessment must be provided to evidence the unviability of the employment provision.

Justification for the policy

- 1.93. We recognise the challenges in delivering employment land in the District but the very real need for such provision. Securing mixed use developments is identified as a very clear way forward to secure provision. From past assessment work we have identified that one hectare of employment land, across a range of employment uses, might support around 250 jobs. This ratio is the same as 0.4 hectares for 10 jobs and 0.1 hectares for 25 jobs.
- 1.94. Working on the basis of around one economically active person on average per each new home built and with an aspiration on qualifying sites for each resident to have the potential to 'work on site' it generates the site space requirements established in policy.

Settlement Boundaries

- 1.95. Settlement boundaries (referred to as Built-up Area Boundaries in the adopted EDLP) are a fundamental policy tool for determining areas and locations that are generally suitable for development. Boundaries are drawn around settlements that are identified as appropriate for growth and they serve three primary functions:
- a) They define where (within the boundary) development will be acceptable in principle because it will complement objectives of promoting sustainable development.
 - b) They set limits for outward expansion of settlements and in so doing control the overall scale and location of development that occurs in order to ensure implementation of the plan strategy;
 - c) they prevent unregulated development across the countryside and open areas;

6. Strategic Policy – Development inside Settlement Boundaries

Within the settlement boundaries defined on the proposals map development will be supported in principle. This does not mean that all development will be acceptable within settlement boundaries: proposals will be considered on their own merits having regard to other policies in this plan and any made neighbourhood plan.

This is a strategic policy and significant changes to the boundaries defined through neighbourhood planning would be incompatible with it. However, neighbourhood plans that propose modest adjustments to the settlement boundaries to increase the opportunities for additional development may be considered to be compatible with this policy.

Justification for inclusion of policy

- 1.96. Settlement boundaries help to direct growth to areas that meet our plan objectives and make it clear where development is most likely to be acceptable. This helps to give a degree of certainty to decision makers, local communities, landowners and developers about where development can be expected.
- 1.97. A Principles of Settlement Boundaries Topic Paper (which was prepared for consideration by Strategic Planning Committee in 2021) sets out the relevant background and issues in more detail. When drafting the settlement boundaries, we have tried to follow our agreed methodology, but welcome comments on both the methodology and whether the boundary lines comply with it or not.
- 1.98. Settlement Boundaries have been drawn around our Tier 1 to Tier 4 settlements (large strategic development sites may also have such boundaries or otherwise have a clear allocation for development).
- 1.99. We want our settlement boundaries to be used to help manage our growth patterns in line with national planning guidance. We want them to be used to guide, but not stifle the outward growth of settlements in line with our plan strategy. The settlement boundaries include sites that are preferred allocations for development but do not include 'second choice' sites. The boundaries will be amended to reflect whatever sites are ultimately allocated for development through the final plan. Settlement boundaries may exclude some areas that are already 'built-up', but nevertheless would not be considered appropriate locations for additional development (as in the current development plan). Outside of the settlement boundaries, development is more restricted, under separate plan policy set out below.

Land outside of settlement boundaries

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



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

1.102. The majority of East Devon will fall outside of any settlement boundary. In these areas development will be limited to what is specifically allowed through policy, such as rural workers dwellings or 'exception' affordable housing. The areas affected will include relatively remote and rural areas, but also smaller settlements and some areas in or close to places that have a settlement boundary. The purpose of drawing a settlement boundary is to show where planning policies will generally encourage new development and where they will not. Settlement boundaries help to set clear and unambiguous policies to guide decision makers in accordance with the National Planning Policy Framework

(Paragraph 16a). Additional development may come forward through neighbourhood planning, which is very active in East Devon, with 40 designated 'Neighbourhood Areas', 23 'made' plans and at least 8 more at various stages of preparation.

7. Strategic policy - Development beyond Settlement Boundaries

In locations outside of the defined settlement boundaries, development will not generally be supported, except where it is in accordance with a specific Local or Neighbourhood Plan policy that explicitly permits such development and where it would not harm the distinctive landscape, amenity and environmental qualities of the area within which it is located.

Justification for inclusion of policies

- 1.103. This policy is an important mechanism for delivering the local plan strategy. The policy will help us to manage our pattern of growth in line with national planning policy. By focussing development inside the defined settlement boundaries, we will promote the sustainable development patterns agreed through the local plan and limit the potential for significant amounts of development that would undermine this. It would not be possible to focus growth on the locations found to be most suitable through the local plan without a policy that set restrictions on development in other parts of East Devon. However, this should be balanced with the needs of our rural communities for suitable growth opportunities. The plan achieves a suitable balance by allowing local communities to plan for appropriate developments and having policies that make provision for some forms of development.
- 1.104. Land outside of settlement boundaries will be treated as 'countryside' in planning policy terms, even though some of it will comprise built-up areas. Such areas of 'countryside' will not usually be considered suitable for development unless a policy in this plan (or a made neighbourhood plan) explicitly provides for that type of development. This means that there will be some flexibility to allow, for example, affordable housing to meet local needs or the conversion of existing buildings.

4. Chapter 4 – Addressing housing needs and identifying sites for development

Addressing housing needs

1.105. Depending on what committee decide on the 7 October 2022 we may need to include some text here about housing numbers and some of the options for addressing the numbers – specifically if we want to ask questions about these options. Otherwise, for example if all preferred and 2nd choice sites meet needs and we do not want to highlight other options, we would delete this text. We would envisage amending text, if appropriate, in the 1 November 202 redraft of the committee report.

Assessment of sites

- 1.106. One of the critical jobs of a local plan is to identify sites or land areas that can accommodate future development. We use the word 'allocate' to refer to such sites that will feature in the plan.
- 1.107. In line with the strategic approach to development, and specifically the approach of establishing Tiers 1 to 4 to establish suitability for development, settlements of East Devon and sites within and abutting them have been evaluated. Assessment has also been undertaken of sites on the western edges of East Devon where close to the Exeter City Boundary. [Insert evidence link.](#)
- 1.108. It should be noted that sites in locations that do not come into the Tiers 1 to 4 have not been assessed as they do not align with plan strategy and as such would not be appropriate, in principle, for development (under strategy as currently proposed). We have also not assessed sites that are clearly remote or some distance from settlements that do fall into Tiers 1 to 4 as they would fail to meet pedestrian accessibility considerations.

The Housing and Employment Land Availability Assessment (HELAA)

- 1.109. The Council have invited landowners, who may wish to see their land developed, to submit site details to us through an exercise called the Strategic Housing Land Availability Assessment (HELAA). We have used the HELAA and sites submitted through it, or otherwise submitted to us, as a basis to establish sites to evaluate. A number of HELAA 'calls for sites' have been undertaken in East Devon and these have helped establish a database of sites that potentially offer scope for development and as such could potentially be allocated or identified in the local plan for development.

- 1.110. A technical report of assessed sites can be viewed at: [insert link](#) and this work has directly informed proposed site allocations.
- 1.111. On the local plan Policies Map we have shown land allocations suggested as potentially suitable for development on the western side of East Devon as well as for Tier 1 to 4 settlements. We have set out in our consultation:
- Preferred sites, 1st Choice sites, for development; and also
 - 2nd best sites that are not considered to be ideal but may be required as allocations in order to ensure that there could be sufficient sites allocated to meet the housing need
- 1.112. The policies in the plan directly relate to the policies map and we colour code sites as preferred and 2nd best choices as well as showing currently rejected alternative options.

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

What the western side of East Devon is like

- 1.113. The western side of East Devon, close to the City of Exeter, has seen considerable levels of development in recent years and in this new local plan we plan to continue with accommodating high levels of growth in this western area. Projects and schemes that have supported development so far, and which have formed part of the growth agenda, have included district heating, high quality green infrastructure, a full Growth Point programme, the Enterprise Zone designation, new and improved highways and proactive responses to the climate emergency.
- 1.114. Past policy concentrating development in the west of the District, close to Exeter, has reflected:
- the constraints to development elsewhere in the District, specifically the fact that two thirds of East Devon, including much of the north, west and south of East Devon fall in designated AONBs; and
 - in East Devon, close to Exeter and in the City itself, there is a lot of existing built development providing jobs, services and facilities, there is supporting infrastructure and there is a market demand for housing and larger strategic scale development, not the least for employment uses.
- 1.115. These considerations still apply today and much of what will be built on the western side of East Devon over the years ahead is already committed development, either through already planned development at Cranbrook or through sites that are under construction or have planning permission for development.
- 1.116. The western side of East Devon has seen a considerable amount of infrastructure put in place in recent years to support, promote and facilitate new growth and development. A pattern of on-going growth will be able to capitalise on existing infrastructure provision but will also generate, in its own right, the need for additional provision and facilities, this is especially so in respect of proposals for a second new town.

Key messages from the Neighbourhood Plans for the area

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

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

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

Policy for a second new town

- 1.119. In order to provide for the significant levels of housing growth identified for East Devon the local plan is allocating land to accommodate a new town (this is a second new town in addition to Cranbrook). This new town will be on the western side of East Devon close to the border of the District with Exeter city.
- 1.120. Through extensive research and assessment three broad areas of search were identified for the new town and these have now been honed down to identify a preferred proposed land allocation for the new town development.
- 1.121. At the time of drafting this report, September 2022 for committee on the 7 October 2022, the evidence is not available to define a preferred site boundary. However, evidence will be available for the 1 November 2022 committee and as such text will be updated, where relevant, to reference the preferred site and elaborate on wording covering new town policy and development. A clear boundary on a map will show the preferred site along with alternative options that were assessed.

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

Land is allocated, as shown on the Policies Plan, for the development of a new town on the eastern side of East Devon. The new town will be a long-term strategic development scheme that will start being built during the life span of this local plan but development will extend beyond the life of this plan

Development will need to occur and proceed on an agreed phased basis. The town will be built to distinctive high quality design standards with an explicit focus on sustainable construction and building operation and renewable energy production and use. Open spaces and facilities will be readily accessible to all

residents with convenient and attractive pedestrian and cycle links to local destinations and access to high quality public transport services.

Working with our partners we will promote development starting in this plan period but also extending over the longer term (beyond the lifespan of this local plan) to accommodate the following:

1. New Homes

- **Up to 2040** - Around 2,500 new homes on allocated land.
- **Beyond 2040** – Around 5,500 additional new homes on allocated land.
- New homes will need to be of the highest standards in terms of energy and resource efficiency, quality of design and access to services and facilities.

2. Gypsy and Traveller Provision

- **Up to 2040** - Around ??? pitches on allocated land.
- **Beyond 2040** – Around ??? pitches on allocated land.
- Provision will be required in line with 'bricks and mortar' housing and must be integrated with overall development proposals.

3. Jobs

- **Up to 2040** – At least 10 Hectares of land for job generating uses – this figure is commensurate with delivery of 2,500 dwellings up to 2040. Should housing delivery come forward ahead of this rate a commensurate increase in employment land delivery will be required.
- **Beyond 2040** – Around ??? Hectares of land for job generating uses – this figure is commensurate with delivery of ??? dwellings beyond 2040.
- employment shall be made throughout the town to provide a range of business spaces suitable for the needs of businesses as they develop and grow and to accommodate a range of employment opportunities for residents of the new town and surrounding areas.

Serviced or otherwise available land should be available for occupation by employment uses on a phased basis that is directly proportionate to house building:

4. Town Centre

- **Up to 2040** – Initial provision of land and building works.
- **Beyond 2040** – ??????????.
- A town centre will provide a focal point for retail, business and leisure activities and will be designed to create a vibrant day and

night-time economy and this will be complemented by a series of smaller neighbourhood centres.

5. Social, Community and Education Facilities

- **Up to 2040** – ?????????.
- **Beyond 2040** – ?????????.
- Accommodate a full range of social, leisure, health, community and education facilities (including new schools) to meet the needs of all age groups that will live at the new town.

Infrastructure – Infrastructure provision will need to come forward with overall development proposals. The Council will produce an Infrastructure Delivery Plan that will set out key requirements recognising the need for improved transport links and road improvements, district heating connections, new education provision, high speed broadband and other services and facilities to ensure sustainable development is delivered.

Developments shall be developed in a phased and co-ordinated manner alongside the required infrastructure and in accordance with parameter plans for the new town which will be developed in partnership with the developers and the community.

Justification for plan policy

- 1.122. Local plan policy will provide for a second new town in East Devon on land in close proximity to the City of Exeter. Work on identifying an appropriate site started with identifying an overall area of search. From finer grained assessment, including drawing on sites that were submitted through the HELAA process, a series of possible locations for the new town have been identified. These are shown in supporting documentation.
- 1.123. This scale of proposed development will help ensure that a wide range of services and facilities will be provided at the new town with sufficient monies generated to support substantive infrastructure provision.
- 1.124. Amongst other key facilities this scale of development will be appropriate to ensure that a secondary school is planned and built to serve the new town with potential capacity to also support needs generated from surrounding areas.
- 1.125. A new town will be a long time in the planning and it is unlikely that any new homes will be completed until around 2030. On this basis, and at build out rates climbing to around 300 new homes per year, we can expect to see around 2,500 new homes built at the new town by the 2040 end date of the local plan.

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

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

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

- 1.127. The western side of East Devon, notably at the Science Park, Skypark and Exeter Logistics Park have all seen substantial growth in recent years with a focus on higher value and higher skilled jobs. This development has been supported by the Enterprise Zone designation, which has unlocked barriers to growth. These new developments also sit alongside other important employment and economic assets in this western part of East Devon, notably Exeter International Airport. The proposed employment strategy in the plan places a clear emphasis on a continuation of this pattern of employment concentration and growth playing on the particular strengths of this part of East Devon and market demands.

The Enterprise Zone

- 1.128. Enterprise zones are designated in areas where employment and business growth are actively encouraged. Designated areas offer a simpler planning regime and incentives to investors. The Exeter and East Devon Enterprise Zone covers four areas of land in East Devon.
- 1.129. Through plan policy the Council will continue to positively support development of employment generating uses within the designated Enterprise Zone sites. The designated sites have already provided a catalyst for growth supporting demonstrable success and economic prosperity. One of the designated areas falls within Cranbrook and this area is excluded from coverage of this local plan policy and is instead covered in the Cranbrook Plan.

9. Strategic policy – Development within the Enterprise Zone

Within the designated Enterprise Zone as shown on the Policies Plan (excluding the area at Cranbrook which is not addressed in this local plan), support will be given for inward investment and development for business and allied uses.

All new development will need to be complementary to the existing use and purposes of the Enterprise Zone area and its specific vision for development.

All new buildings and supporting infrastructure will need to be of the highest standard to include buildings to BREEAM Excellent or equivalent standard. New buildings will need to connect to the district heating network on Science Park and Sky Park.

Planning applications will need to demonstrate through a Travel Plan how the development will support the use of active travel and public transport. There will be a requirement for active travel routes throughout the designated sites, linking to the surrounding settlements, including Exeter. New developments will be required to be accessible by walking, cycling and public transport, and must not generate traffic of a type or amount inappropriate for the character of existing or improved access roads.

Planning applications will need to show how proposals will include and promote high quality digital connectivity ensuring infrastructure reflects the most modern speeds and technologies.

In the designated Enterprise Zone a range of building types and sizes, to maintain a flexible and competitive offer will be allowed for. However, other than at Exeter Logistics Park large-scale warehousing and distribution development within the Enterprise Zone, will only be allowed:

- as a limited part of a mixed use scheme and
- providing it will not compromise the ability of those sites to deliver significant high value employment

Justification for policy

1.130. The Enterprise Zone designation has been a clear success and the intent is to build on this success. There will be a continued focus on developing Local Development Orders (LDO) to support the delivery of economic growth.

1.131. An LDO is an Order made by the Local Planning Authority (LPA) that grants planning permission for a specific development proposal or classes of

development in defined locations. LDOs were introduced through the Planning and Compulsory Purchase Act 2004 ('2004 Act') and allow local planning authorities to extend permitted development rights for certain specified forms of development subject to conditions.

1.132. Local Development Orders streamline the planning process, providing clarity and certainty for development and encourage investment into the area. Such orders will sit alongside local plan policy and provide more detail on appropriate development for the sites. LDO's constitute a planning approval, enabling a fast-track route for development to be implemented in a timely manner to support businesses and job creation.

1.133. At the time of publication the following LDOs have been developed:

- District Heating
- Power Park, Exeter

The Council is currently working on an LDO for Sky Park.

Exeter Science Park

1.134. Exeter Science Park lies to the north-east of Junction 29 of the M5 motorway. Science Parks are frequently connected with universities, as ours is with Exeter University and it draws on the academic excellence of the university. The Exeter Science Park provide an environment that supports and encourages science, technology, engineering, mathematics and medical) companies to prosper and thrive.

1.135. The existing Exeter Science Park has grown at pace since the early 2010s and has attracted a range of high-quality businesses and considerable new investment in recent years.

10. Strategic policy – Exeter and East Devon Science Park

At the Exeter Science Park, as shown on the Proposals Map the following uses will be acceptable:

- research and development of products or services;
- active collaborations with universities, higher education, institutes, research or similar organisations;
- technology based services;

Uses which support the above primary activities and supporting green and grey infrastructure will also be accommodated.

New business developments will need to be of the highest quality built in a campus style setting, to reflect the existing Science Park development, with a particular emphasis on provision of high environmental quality and standards.

Other than for supporting infrastructure planning permission will not be granted for built development that comprises of non-business or for businesses that do not accord or align with Science Park objectives.

Justification for plan policy

- 1.136. To accommodate future needs for the Science Park a continuation of the current approach to development is promoted. The existing 'gateway policy' (a legal agreement which relates to the original planning permission) for the Science Park will be maintained to ensure that developments will continue to provide and contribute to transformational economic impacts across the area. The 'gateway policy' for the Science Park is not a Development Plan policy, but it does address the types of business uses that will be able to locate at the Science Park and how they operate.

Development of land north of Exeter Science Park

- 1.137. Land to the north of Exeter Science Park offers scope for high quality employment growth in this part of the district and is allocated accordingly.

11. Strategic policy – Land north of the Science Park

A land area of around 4.3 hectares, as shown on the Policies Map, is allocated for job generating uses in the business, research and technology related sectors and supporting green and grey infrastructure will be accommodated. New business developments will need to be of the highest quality and should reflect forms of development in the surrounding area, notably Science Park development to the south, with a particular emphasis on provision of high environmental quality and standards.

Other than for supporting infrastructure planning permission will not be granted for built development for non-business job generating uses.

Justification for plan policy

- 1.138. To help with the continuation of the pattern of employment growth on the western side of East Devon it is appropriate to allocate additional land for job

generating uses. This site is to the north of the existing Science Park and to the east of the M5 Motorway, which could have some noise impacts and which could adversely impact on suitability for some non-employment uses.

- 1.139. The site would form a logical extension to the pattern of employment development in this part of East Devon and would draw on locational qualities that have already seen and secured substantive investment and development close by. As such the site could help deliver highly-skilled, high-quality well-paid jobs.

High quality development north of Sowton village

- 1.140. We have identified the need for a further major strategic land allocation for employment uses close to junction 29 of the M5 Motorway and land is allocated directly to the north of Sowton village (south–east of Junction 29 of the M5 and south of and alongside the A30).

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

An area of around 17 hectares of land, as shown on the Proposals Map, to the north of Sowton village, is allocated for employment uses.

High quality development of the site will be essential given both its proximity to the village of Sowton and its built heritage importance and the more general open setting of the site and visual proximity to the A30 at a gateway entrance point to East Devon when leaving the M5 motorway and the city of Exeter.

The site will form a mixed-use business park at which the following uses will be considered appropriate;

- a mix of B2, B8 and E(g)
- A limited element of ancillary uses such as indoor sports, recreational, crèche or café will be permitted

Other than for supporting infrastructure, and exceptions noted above, planning permission will not be granted for built development that comprises of non-business uses.

Justification for plan policy

- 1.141. Land to the north of Sowton village, south of the existing Science Park and A30, occupies a visually prominent position close to the M5 Motorway, Junction 29 and the A30. It can be expected to be attractive to potential inward investors

and would help carry forward the proposed employment strategy. High quality development will, however, be essential given the sensitive nature of surrounding areas, specifically including Sowton village, which is of historic interest, contains several listed buildings and much of the village lies within a Conservation Area. It is also the case that some land around and close to Sowton village falls in a floodplain.

Exeter Airport and development in the environs

- 1.142. Exeter Airport is of strategic importance for travel and communications for the south-west of England and it forms a key asset for East Devon and surrounding areas. Plan policy supports its future operation and growth of the airport as a key gateway to the region and in providing the opportunity for highly skilled, high value job creation in aviation and other sectors.

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

Growth and expansion of the airport and airport related businesses and operations will be supported within its current operational boundaries.

The role of the Airport as a test bed for new technologies will be supported through promoting the development of a sustainable aviation cluster. Land to the north of the runway will be allowed to support aviation related development including research and development activity alongside maintenance/repair/overhaul and new freight/cargo operations.

Land to the south will be allowed to accommodate further aviation related, employment and training/education uses. This can include occupiers who rely on proximity to an Airport or who benefit from a transferrable skill base as well as to support the developing logistics cluster.

Any new developments must not, however, prejudice or adversely impact on the core operational role and functions of the airport as a travel facility handling the air bound movements of passengers and freight.

Noise sensitive development within the 57db noise contour around the airport will be restricted (in order to ensure future airport operations are not adversely impacted) alongside ensuring that any development proposals do not have a material impact on the operation of navigational and safety systems.

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

Justification for plan policy

- 1.143. Exeter Airport plays an important role as a key gateway to the region. This helps to support access to markets and both inbound and outbound tourism as well as providing a home operating base for the Devon Air Ambulance and National Police Air Service helicopters and the nightly Royal Mail flight. Passenger numbers have increased steadily over time, reaching a peak of over one million passengers per annum in 2019. The pandemic has though had a dramatic impact. Flybe was headquartered at Exeter Airport and, when the airline went into administration in March 2020, over 900 jobs were lost locally. This was the biggest economic shock ever experienced in the District. Passenger traffic reduced by over 90% in the following year.
- 1.144. It is estimated that it may take up to 5 years for passenger numbers to return to their 2019 levels. There has though been some positive progress latterly including;
- The majority of domestic routes being operated by alternative airlines
 - The hangars being taken over by Exeter Aerospace to re-provide a maintenance, repair and overhaul operation
 - The purchase of the former Flybe Training Academy by Devon County Council and its relaunch as the Future Skills Centre operated by Exeter College to provide a specialist facility for the delivery of training for future-facing high-tech jobs in engineering, digital, construction and clean growth.
- 1.145. It is important that the Local Plan sets a policy framework that both safeguards current operations and supports recovery, particularly the potential to pivot towards a more sustainable future. There is a global challenge to decarbonise the aviation industry. There is a particular opportunity for Exeter Airport to act as a testbed for new technologies and modes of propulsion through the creation of a sustainable aviation cluster. A recent report for the Heart of the South West Local Enterprise Partnership highlights that the Airport could be a hub for a wider test corridor. There has already been a test of hybrid electric flight to Newquay Airport through the Future Flight programme. The opportunity to develop this potential is alongside the need to decarbonise existing operations, for example through promoting public transport accessibility and the installation of renewable energy generating capacity.
- 1.146. In addition to the airfield itself there are opportunities to bring forward further development land both to the north and south of the runway to complement the operation of the Airport. To the north there is an opportunity to develop further

space to support research and development activity around future flight alongside developing new markets for cargo linking to the nearby presence of Exeter Logistics Park. To the south there is an opportunity to bring forward further commercial development including allowing for the continued expansion of education and training provision.

- 1.147. It is essential that new development does not compromise the safe operation of the Airport. This applies both in terms of the proximity of noise sensitive development and the safeguarding of navigational and safety systems.

Employment land to the east of Power Park

- 1.148. Land is allocated, it currently has Enterprise Zone status, for employment uses to the east of airport terminal buildings, and the site is shown on the Policies Map and is expected to accommodate a range of business uses.

14. Strategic Policy – Employment land to the east of airport buildings

An area of 7.7 hectares of land, as shown on the Proposals Map to the east of existing airport buildings, is allocated for employment uses. The site will form a mixed-use business park and the following uses will be considered appropriate;

- The site will accommodate a mixed use scheme of employment generating uses, which may include - B2, B8 and E(g)
- A limited element of ancillary uses such as indoor sports, recreational, crèche or café will be permitted

Other than for supporting infrastructure, and exceptions noted above planning permission will not be granted for built development that comprises of non-business uses.

Justification for plan policy

- 1.149. The proposed allocation provides an additional employment site, sited next to the Power Park, to the south of Exeter Airport. There is currently work to improve the sustainability of this area, with the improvements to Long Lane and use of Silverdown Link as a dedicated bus loop/cycleway for the area. Increasing employment density will improve the viability of public transport provision to the locality.
- 1.150. Uses that support the role and function of the airport and aviation industry will be positively considered. Land allocations and subsequent development may

support an increasing transition of aviation away from fossil fuel reliance to less polluting fuel options.

Employment land east of the Airport and north of the A30

1.151. Land is allocated for employment uses to the east of the training academy/hotel, and the site is shown on the Policies Map. The site is specifically earmarked for high technology airport related uses and clean green technology forms of development.

15. Strategic Policy – Employment land east of the Airport and north of the A30

An area of 12 hectares of land, as shown on the Proposals Map to the east of existing airport buildings, is allocated for employment uses.

The following uses will be considered appropriate;

- B2 and E(g);
- A limited element of B8;
- Sui-generis uses which comply with this policy
- A limited element of ancillary uses such as indoor sports, recreational, crèche or café.

The development will need to come forward in accordance with an approved phasing plan and promote active travel measures and other than for supporting infrastructure, and exceptions noted above planning permission will not be granted for built development that comprises of non-business uses.

With its proximity to Exeter Airport the site is well positioned to assist the role of the airport. Uses which relate to the aviation sector and its wider supply chain will be supported alongside other high value employment uses that facilitate economic growth within the area.

Justification for plan policy

1.152. Land to the east of Exeter airport buildings is allocated for airport related and aeronautical business and commercial activity. **Insert more text..... Should the above land allocations (and others) be more explicit in respect of the types of uses that under the green growth agenda. Revisit text for the 1 November 2022 committee meeting.**

The ongoing development and potential for expansion of Cranbrook

- 1.153. Cranbrook is a new town under construction on the western side of East Devon, around 5 km from the M5 Motorway and the boundary with Exeter City. From a green field start in 2011 the new town has grown to a town of around 3,000 homes (as at end of 2021). The Cranbrook Plan (a Development Plan Document) for the town is expected to be adopted in Autumn 2022 and it includes policy to expand the town to close to 8,000 homes.
- 1.154. It is **not** proposed that the new local plan will supersede the Cranbrook Plan. The policies of the Cranbrook Plan will remain applicable and will be formally saved. The Cranbrook Plan does, however, only run to 2031 and this means that the new local plan will need to be revised and replaced before this date to ensure policy coverage for and at Cranbrook in future years. There are also some existing local plan policies that are applicable at Cranbrook and a view will need to be taken, in due course, on whether these are also saved or whether we supersede them with new local plan coverage that may for selected policies ‘sweep-over’ and include land in the Cranbrook Plan area.
- 1.155. Whilst the Cranbrook Plan will remain in place for the Cranbrook Plan Area, beyond this defined area (i.e. on land covered by the new local plan), there are land areas on the edge of what is Cranbrook (or will be the edge where planned development occurs) that could accommodate further Cranbrook related development.
- 1.156. However, given the sensitivities of assessed sites for development on the edges of Cranbrook none are proposed for development in the new local plan. The options for outward expansion of Cranbrook were assessed as part of the Cranbrook Plan preparation work and appropriate development areas were identified with a very clear steer, therefore, provided on land that was unsuitable or inappropriate. Furthermore there is already substantial development planned to happen at Cranbrook and it would be far more appropriate to provide for this to come forward, over the years ahead, and then to review any potential for further outward expansion at a much later date through a different plan and its production.

Relationship with Neighbourhood Plans

- 1.157. The Cranbrook plan DPD boundary overlaps to some extent with a number of neighbourhood plan areas, particularly for the parishes of Rockbeare, which has a made neighbourhood plan (2018), and Whimble, where neighbourhood plan preparation is underway.
- 1.158. Notwithstanding the identified reasons for not proposing allocation of land for development on the edges of the Cranbrook Plan boundary in this local plan,

there is and remains the option for Neighbourhood Plans to seek to allocate land and bring it forward for development.

- 1.159. The thrust of the Rockbeare plan (and early indications from the Whimble plan work) are however to seek to ensure that a clear separation remains from the development at Cranbrook, and to maintain the individual identity and rural character of the existing villages in those plan areas. The Rockbeare plan expressly supports the green wedge in the adopted Local Plan. There is also a close relationship with the advancing Broadclyst parish neighbourhood plan (currently at examination), which seeks better connectivity with Cranbrook to benefit its resident population. As submitted, it proposes two sites for development/regeneration near the Cranbrook boundary.

Green infrastructure and a high-quality environment for the western side of East Devon

- 1.160. Green Infrastructure comprises of open green spaces and natural areas and includes the footpaths, cycle ways and other routes that link these together to encourage people to enjoy these assets. Considerable emphasis has been placed on Green Infrastructure provision and enhancement on the western side of East Devon in recent years, in particular through provision and development of the Clyst Valley Regional Park.
- 1.161. Plan policy seeks to continue with the positive approach to green infrastructure provision with better and enhanced provision. With future strategic scale development proposed on the western side of East Devon there is a clear strong case for park expansion to ensure a greater and accessible green and recreational asset is available to residents and employees at any new development and to the public more widely.

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

Development proposals, and specifically larger scale schemes on the western side of East Devon, will individually and collectively need to contribute to the implementation and long-term management of green infrastructure initiatives through appropriate contributions and/or on-site provision.

Clyst Valley Regional Park

Land is allocated, as shown on the policies map, to accommodate an extension to the existing Clyst Valley Regional Park. **Note that a boundary has not been defined and it**

will need to come to committee on the 1 November 2022 for approval, we will also look to rework plan policy. Within the existing extent of the park, as also shown on the policies map, and in the allocated extended area all development proposals should promote park objectives in this policy. Any schemes that run counter to the objectives or which would frustrate their implementation will be refused planning permission.

The objectives of this policy for the Clyst Valley Regional Park are to:

- a) Provide high quality natural green space that is complementary to built development and will be a stimulus to encourage commercial and business development of the highest standard.
- b) Ensure natural ecosystems function and all people of all abilities have easy access to high quality open spaces, with linked benefits to health, education and food production.
- c) Take recreation pressure away from more environmentally sensitive locations. We will encourage a park that 'reaches into' surrounding areas. The park offers scope to provide mitigation for adverse impacts on protected habitats that could otherwise arise through development.
- d) Provide new wildlife spaces and corridors that enhance biodiversity and provide green links, open space and biodiversity enhancement areas.
- e) Promote cycling and walking opportunities to link habitats and sustainable movement networks that promote the overall recreational experience.
- f) Conserve and enhance heritage assets and their setting to reflect their intrinsic importance, maximise beneficial outcomes for park users and to encourage use of the park and to enrich the cultural identity of the area.

The park will be designed and managed to the highest natural green design standards. Development will not be allowed in the allocated park areas unless it is specifically for green open spaces and parkland or park related uses.

Where development occurs outside of but close to the allocated park any green space provision associated with or required for the development should be linked to and provide pedestrian and cycle access into the park. New development may also

contribute directly to park provision. Park provision and delivery will draw more widely on developer contributions, the Community Infrastructure Levy and agricultural-environmental funding streams.

Justification for policy

- 1.162. The Clyst Valley Regional Park forms an important strategic asset on the western side of East Devon. The park forms a setting for new developments and was first defined and established alongside work on earlier strategic developments schemes.
- 1.163. A 25-year masterplan for the Regional Park was the subject of public consultation in 2020 and subsequently approved by EDDC in February 2021. The masterplan won the 2021 RTPI South West Award for Planning Excellence.
- 1.164. The extension and modification of the Regional Park boundary has been informed by a Landscape Character Assessment (ref). EDDC have collaborated with ECC during the production of both the LCA and Exeter's own Landscape Sensitivity Study. The LCA and a paper providing the rationale for the new boundary forms part of the evidence base for the Local Plan.
- 1.165. The Regional Park is an area with multiple objectives;
- To enhance the health and wellbeing of residents
 - To create opportunities for people of all ages and abilities to learn outside the classroom.
 - To protect irreplaceable habitats, restore natural processes, ensure that internationally important wildlife sites achieve their conservation objectives, and increase the size, quality, quantity and connectivity of priority natural habitat and populations of key species.
 - To rapidly reduce greenhouse gas emissions and increase resilience to extreme weather events and rising sea levels.
 - To achieve good ecological status in the River Clyst and tributaries, enhance natural flood storage, and restore soil health.
 - To restore landscape character and promote local distinctiveness and to maintain the high landscape setting of Killerton.
 - To protect historic landscapes, sites, buildings and their settings, enhance them where appropriate and promote public access to and enjoyment of them.
 - To increase and sustain high value jobs.
- 1.166. The concept of the Regional Park is that a number of greenspaces will be linked by predominantly traffic-free trails and good, safe, regular and affordable public transport. There is no intention that the whole of the Regional Park will become accessible to the public, as most of it is in private ownership. In addition, the principle of safeguarding sanctuary areas for wildlife has been established.

However, 762 hectares is currently accessible and the ambition is to increase that by a further 740 hectares over 25 years. A large proportion of the Regional Park is within the National Trust's Killerton estate. 40% of the Regional Park is within a floodplain.

- 1.167. An important function of the Regional Park is to ensure that European protected wildlife sites continue to meet their conservation objectives. Suitable Alternative Natural Greenspace (SANGS) can help to mitigate the impact of public disturbance on Natura 2000 sites (see policy X). Strategic SANGS may be brought forward by EDDC or by developers. They may be within the Regional Park, but provided they meet the SANGS criteria, could also be delivered outside the Regional Park boundary.
- 1.168. A multi-partner Cyst Canopy project has set a 50-year objective of moving tree cover from 10% to 30%. This expansion of tree and shrub cover will be achieved by: (a) ensuring our existing mature trees are retained and sustainably managed; (b) natural regeneration of woodland and wood pasture; and (c) tree planting. Planting could take many forms; mixed species forests, parkland, orchards, hedgerows, shelter belts, arable and pastoral 'agro-forestry' systems. Urban tree cover is also vital.
- 1.169. Delivery of the full suite of Regional Park objectives relies on partnerships across public, private and charitable sectors. Capital and revenue funding will also need to come from diverse sources, including Community Infrastructure Levy and Section 106 obligations. EDDC has led two successful bids for funding from the National Lottery Heritage Fund, with match funding from different partners.
- 1.170. Separate policies for Biodiversity Net Gain, European Protected Sites, Landscape Character and Climate Change apply within the Regional Park, as do other plan policies specifically relating to development in the countryside and all policies should be read in conjunction with the proposed park policy.
- 1.171. We have established targets for the Regional Park, as follows:
- Creation and/or restoration of 1000 hectares of priority natural habitat within the Nature Recovery Network
 - 30% tree canopy cover
 - 740 hectares of Public Open Space meeting 'Building with Nature' or 'Green Flag Award' standards (Natural England have said they will publish GI standards in autumn 2022)
 - 80 km of traffic-free trail and quiet way meeting LTN 1/20 design standards
 - Enhancement of landscape character, including the setting of Killerton and other Grade 1 listed land and property
 - Provision of high quality, net zero facilities that meet Equality Act 2010 standards and that promote outdoor education, non-motorised access,

environmentally sustainable recreation, accommodation, and the growth and local consumption of food and drink

- Public art
- Achievement of good water quality in the River Clyst by 2030
- Net zero, with a specific focus on carbon sequestration particularly through habitat creation
- Adaptation to future climate, with a specific focus on Natural Flood Management
- Promotion of culture and customs in connection with all of the above

Development north of Topsham and east of the M5 Motorway

- 1.172. Taking advantage of proximity to the City of Exeter and links with neighbouring Topsham, in the city, we are allocating land for an urban extension to the north of Topsham.

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

Land shown on the Policies Map (precise boundary to come back to the 1 November 2022 committee meeting and policy wording to be refined) is allocated for a strategic development scheme for an urban extension to the north of Topsham.

A mixed use development scheme is required at this site which will:

- Require a comprehensive masterplan for the whole site to be produced and agreed before specific parcels of land come forward;
- Joint working across the City boundary to align development in East Devon with that in the City;
- A range of facilities to meet and address East Devon and cross boundary needs - needs to be determined in the context of East Devon and Exeter collective needs and provision and capacity in Exeter city (existing and planned) services and facilities.
- Around 580 new homes and at this level at least 2.4 hectares of employment land (to be pro-rata increased at 0.4 hectares of land per 100 extra new homes (or part of) should the homes number increase).
- Transport and especially pedestrian and cycle links including potential for a new rail crossing; and
- Require that any development respects the landscape quality of the lower Clyst and provides links with the Clyst Valley Regional Park.

Planning permission will not be granted for any individual parcel of land in the allocation in the absence of a comprehensive development scheme with clear mechanisms outlined for full policy requirements to be met and delivered.

Justification for plan policy

- 1.173. Land at/close to Exeter, to the south of Junction 30 of the M5 offers an exciting opportunity for new mixed use development. This land lies to the east of the M5 Motorway and offers scope to accommodate a suggestion of approximately 580 new homes. It is noted, however, that capacity could fall with any employment or other necessary uses required to support mixed use development. All figures quoted should therefore be taken as a guide and be considered as indicative only at this early stage of plan preparation.
- 1.174. This land suggested for development abuts, to the south, land in the City of Exeter that is currently being built out for housing development. There are a range of sites and land parcels in the city itself between the city boundary with East Devon and Topsham that are being developed or have planning permission. Any development in East Devon should be seen within, and planned within, the context of city development as well.
- 1.175. There is a need for a comprehensive masterplan to be developed to support the whole of the proposed East Devon development, but this master planning work should also, ideally, extend across the city boundary and form a wider partnership plan for a bigger area that could come forward for development.

Relationship with the Neighbourhood Plans for the area

- 1.176. This area is covered by the Clyst St George neighbourhood plan which was 'made' in January 2019. The sites under consideration for allocation here lie in the vicinity of an area identified in the plan as a 'small but significant part of the parish', lying to the 'west of the River Clyst and east of the M5, which forms the boundary with Exeter', known locally as the Clyst Road or 'Blue Ball Inn' area. The existing development here is identified as one of three 'settlement areas' in the neighbourhood plan area, together with Ebford and Clyst St. George. The neighbourhood plan includes policy to highlight and protect the ecological significance of the floodplain and ensure development properly addresses flood risk.
- 1.177. The plan conveys concern by residents about any significant scale of development and change in the rural nature of the area, particularly in respect of coalescence with Exeter and road safety, seeking future development that meets local needs only.
- 1.178. The neighbourhood plan did not allocate any sites for development, considering this unnecessary at the time when the newly adopted Local Plan strategy dealt with the entire plan area as open countryside (including this entire 'edge of Exeter area' as a designated Green Wedge), such that any development would

be appraised as an exception. The plan states that the Parish is “unable to accommodate further major development without significant investment in local infrastructure”, citing deficiencies with local community services, recreational facilities and the footpath and cycle network, and includes policy aimed at encouraging improvements. The plan policies do however set out a suite of criteria/requirements/aspirations which could be used to inform any development brief/masterplan if allocations are made and seek to ensure the appropriate delivery of infrastructure to support growth.

Gypsy and traveller site east of the M5 and south of the Exeter-Waterloo line

- 1.179. Land has been promoted for development through the HELAA process that is east of the M5 and south of the Exeter-Waterloo line. One option identified in the submission was for a gypsy and traveller site.
- 1.180. There is an unmet need for further gypsy and traveller provision and there are strong historic ties with the western side of East Devon and gypsy and traveller movement patterns and homes. The site would lend itself to an allocation for extra provision.

18. Strategic Policy – Gypsy and traveller site east of the M5 and south of the Exeter-Waterloo line

Land shown on the Policies Map that lies to the east of the M5 and south of the Exeter-Waterloo line is allocated for a gypsy and traveller site.

Planning permission will be granted for development of a gypsy and/or traveller site to address need for provision specifically on the western side of East Devon District. The allocated site benefits from good highway access roads to the south though any proposal will need to be carefully designed to avoid adverse impacts on surrounding uses and the high quality of commercial and residential development in this part of East Devon.

An area of floodplain covers part of the site and as such built development will need to be within central and northerly parts of the site. Development for non gypsy and traveller uses and occupation, other than for supporting infrastructure, facilities and landscaping will be resisted.

Justification for plan policy

- 1.181. The most recent gypsy and traveller needs study showed an unmet need for further gypsy and traveller accommodation in East Devon. We are also aware of a particular need based on historic travelling patterns and land that in the past has provided homes for provision on the western side of East Devon. There is a new gypsy and traveller accommodation study that is currently underway and this will tell us more about current needs going into the future.
- 1.182. Based on what we do know now we have identified this site for gypsy and traveller accommodation. It has good highway access from the south, albeit partly on a quite narrow lane, and provides for pedestrian access to a range of services and facilities. The site used to accommodate a piggery that is now understood to have ceased operating and there are a range of old farm buildings on the site.

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

Axminster

- 1.183. The Local Plan strategy establishes Axminster as a Tier 2 settlement and as such as an appropriate location for future growth and development. Plan policy sets out land allocations for development and these are shown on the policies map along with other policy boundaries that are at the town.

19. Strategic Policy – Axminster and its future development

The sites/areas listed below are potential sites for allocation at Axminster as shown on the Policies Map. On the policies map sites are colour coded to indicate whether they are preferred or 2nd choices sites and we also show sites that have been assessed and at this stage rejected as possible choices for allocation for development.

- a) **Land east of Lyme Road (GH/ED/79) and Pestaller Farm, Beavor Lane (Part of GH/ED/80)** – The endorsed Axminster Masterplan provides guidance for how this site should come forward. This site is allocated for 293 dwellings and 1 hectare of employment land. This is a preferred allocation.
- b) **Land east of Chard Road (GH/ED/82)** – This land was proposed for employment uses in the endorsed Axminster Masterplan with an extensive landscaping buffer in the northern part of the site. It is allocated for 2 hectares of employment land. It is a preferred allocation for employment use only.
- c) **Land west of Chard Road (GD/ED/83)** – this land is proposed for 150 dwellings and 0.6 hectares of employment land. This is a preferred allocation.
- d) **Land west of Musbury Road (part of Axmi_01)** – the southern part of this site that lies outside of the floodplain is allocated for 2 hectares of employment land. This is a preferred allocation for employment use only.
- e) **Land east of Musbury Road (Axmi_02 and Axmi_08)** – this land is proposed for 168 dwellings and 0.6 hectares of employment land. This is a preferred allocation.
- f) **Land at Axminster Carpets (Axmi_07)** – this land is allocated for mixed-use redevelopment to retain the existing employment use and accommodate 50 dwellings plus additional employment uses. This allocation will need to be supported by further flood risk assessment and a comprehensive masterplan to secure pedestrian, environmental and other improvements. This is a preferred allocation. The site is already in employment use and the land will not be included in the amount of employment land allocated in the plan.
- g) **Scott Rowe Building, Axminster Hospital, Chard Road (Axmi_10)** – this land is allocated for 10 dwellings. This is a preferred allocation.
- h) **Land at Lea Combe, Field End (Axmi_12)** – this land is allocated for 9 dwellings. It is a preferred allocation.
- i) **Great Jackleigh Farm (Axmi_09)** - this land is allocated for 270 dwellings and 1 hectare of employment land. This is a 'second choice' site.
- j) **Land east of Lyme Close (Part of Axmi_11)** - this land is allocated for 100 dwellings and 0.4 hectares of employment land. This is a 'second choice' site.

In the event that all preferred allocations and 2nd choice sites being consulted on were allocated this would lead to the following:

Total new homes proposed for allocation at Axminster = 1115

Total land area proposed for employment at Axminster = 7.2 hectares

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

- 1.188. Axminster has a reformed Steering Group which since early 2021 has been actively developing a neighbourhood plan for the town and parish. Previous work on a neighbourhood plan had stalled in 2018 due to the on-going uncertainty regarding the proposed eastern urban extension and associated relief road. An initial public consultation for the renewed neighbourhood plan work was held over summer 2021. The results of this, together with on-going evidence gathering, have informed an early working draft neighbourhood plan. Published results highlight a key concern being to ensure any new development is matched with improvements in infrastructure and facilities provision, and for traffic issues in the town centre to be addressed and not exacerbated. Support for new development was primarily limited to more employment, commercial and community uses, as well as affordable housing.
- 1.189. A further public consultation to test and refine the draft neighbourhood plan prior is being planned currently. Undertaking this work as the new Local Plan emerges is clearly more challenging, and there is on-going liaison between the Neighbourhood Plan Group and district planning officers.

Suitability for development

- 1.190. Axminster is one of the main settlements in the east of the District and has been categorised as a Tier 2 settlement, which is suitable in principle for significant growth. It is largely outside of the AONB's, has a train station, good bus links and access to the road network.
- 1.191. These factors suggest it is a good location to consider for growth, but there are also constraints. The River Axe is a Site of Special Scientific Interest and further housing development could exacerbate existing nutrient management issues. Development in Axminster will need to be able to mitigate any detrimental impact on nutrient levels on the River Axe and work is ongoing on how this can be achieved. There is a wide floodplain to the west of the town and an important group of historic assets to the north. To the south there is a further floodplain, the A30 Trunk Road, the East Devon AONB and two Scheduled Ancient Monuments, one of which may mark the site of a Roman fort and crossroads: it is likely that further Roman remains extend beyond the designated area. There is attractive hilly land to the east, some of which has limited potential for road access.
- 1.192. The currently adopted local plan allocates a strategic site to the east of the town as an urban extension and this includes provision for an Axminster relief road. A masterplan envisaged the delivery of up to 850 houses, a school, employment land and a distributor road. However, there are very significant viability issues concerning the delivery of the relief road which would require in the region of £15million of public money to deliver. It is very unlikely that such funding will become available, and it would not be possible to demonstrate that allocations

requiring the relief road are viable and deliverable. It is not recommended that the new local plan includes policy for a relief road to the east of Axminster because we cannot demonstrate that it could be implemented.

Exmouth

- 1.193. The Local Plan strategy establishes Exmouth as a Tier 1 settlement and as such as an appropriate location for future growth and development. Plan policy sets out land allocations for development at Exmouth and these are shown on the policies map along with other policy boundaries that are at the town.

20. Strategic Policy – Exmouth and its future development

The sites/areas listed below are potential sites for allocation at Exmouth as shown on the Policies Map. On the policies map sites are colour coded to indicate whether they are preferred or 2nd choices sites and we also show sites that have been assessed and at this stage rejected as possible choices for allocation for development.

- **Land on the north-eastern side of Exmouth** – this land on the north-eastern side of Exmouth is proposed for a mixed-use development to provide around 258 new homes and 1 hectare of employment land. The land area is made up (parts or all) of sites under HELAA references – Exmo_04, Lymp_09, Lymp_10, Lymp_14 – and these sites will form an extension to the town which must be master planned as a coherent overall development scheme. Development of sites Lymp_09 and Lymp_10 lie to the north of Hulham Road which is a busy road, any development of these sites will be dependent upon provision of new and safe pedestrian and cycle crossings for this road.
- **Exmo_06** – this land at Douglas Gardens will form a small-scale residential extension on the southern side of Exmouth to accommodate around 44 new homes.
- **Exmo_08 and Exmo_16 combined** – this land close to Littleham will form a small-scale residential extension on the southern side of Exmouth to accommodate around 45 new homes.
- **Exmo_11** – this land south of Courtlands Lane will form a small-scale development on the northern side of Exmouth to accommodate around 12 new homes.
- **Exmo_17** – this land on the northern eastern side of Exmouth is proposed for a mixed-use development to provide 410 new homes and 1.6 hectares of employment and community uses land.
- **Exmo_18** – this land east of Liverton Business Park is allocated for employment uses and will form an extension to the existing business park and extends to around 3 hectares in size.
- **Exmo_20** – this land to south of St John's on the eastern side of Exmouth is proposed for proposed for 150 new homes and 0.6 hectares of employment land.

- **Lymp_07** – this land at Courtlands Cross is proposed for 100 new homes and 0.4 hectares of employment land.
- **Lymp_08** – this land off Summer Lane is proposed as an allocation for 14 new homes.

In the event that all preferred allocations and 2nd choice sites being consulted on were allocated this would lead to the following:

Total new homes proposed for allocation at Exmouth = 455

Total land area proposed for employment at Exmouth = 6.6 hectares

- 1.194. On the draft local plan policies map we identify the sites listed above and we also we show alternative site development options where land has been promoted for development but which we do not consider would be appropriate for development.

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

- 1.199. The parished area of Exmouth is covered by a neighbourhood plan ‘made’ in 2019. A number of the sites put forward for allocation to support the expansion of Exmouth to the north lie within the parish of Lypstone, which has its own ‘made’ neighbourhood plan (2015).
- 1.200. The Exmouth Neighbourhood Plan highlights concerns that infrastructure provision has not kept pace with housing development and places protection of the natural environment as its top priority, including the setting of existing development, green corridors/networks and green spaces in the built-up area. Valued green areas include the proposed Littleham/ Maer Valley Park, in which two potential sites considered for allocation lie (wholly or in part). In terms of any new housing generally, the Exmouth Neighbourhood Plan highlights the need to ensure a good mix is made available, particularly homes suitable for older people or as lifetime homes by design.
- 1.201. A high priority is also placed on enabling more and better local employment opportunities, and improvements in a wide range of community facilities and services. The Plan sets out differing community views regarding the regeneration schemes promoted through the adopted Local Plan and 2011 Exmouth Masterplan and includes support for the phased regeneration of Queen’s Drive for tourism/leisure uses.
- 1.202. In terms of the **Lypstone Neighbourhood Plan** (2015 to 2026), the key message here is that this seeks to retain the rural identity of the parish and has a key aim to avoid any steps towards coalescence with Exmouth. It furthers this aim with policy that seeks to reinforce the Green Wedge within the adopted Local Plan, and to resist development within it. Key objectives are also to keep agricultural land within the parish available for future food and energy production, and to ensure any development in the plan area bring benefits to the Neighbourhood Area. Several of the sites identified for possible ‘second choice’ allocation within Lypstone parish that could form a potential northern extension to Exmouth are within the Green Wedge area. Others are greenfield sites, some of which are currently in agriculture use.

Suitability for development

- 1.203. Exmouth is by some way the largest town in East Devon and it contains the greatest number and range of services and facilities, it has been categorised as the only Tier 1 settlement. There are strategically positive reasons why Exmouth could be a good future location for growth and development but it is also greatly constrained by areas of environmental importance and sensitivity.
- 1.204. Exmouth sees a significant number of residents commuting out of the town for work purposes, in particular travelling to Exeter. The town is unusual in having a town centre that is very much located in its extreme south westerly corner

close to the seafront. One consequence of this is that many of the more recent homes built (including much of the later 20th and 21st century developments) are remote from the town centre.

- 1.205. Scope for development at Exmouth, specifically including any outward expansion, does see development set some distance from the town centre services and facilities but close to nationally important environmental assets. The built up eastern edges of the town are mostly elevated and close to the East Devon AONB and on the north-eastern side of the town is the biodiversity important Pebblebed Heaths. The western side of Exmouth is flanked by the Exe Estuary which is designated in the highest tier of wildlife sites.

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Honiton

- 1.206. The Local Plan strategy establishes Honiton as a Tier 2 settlement and as such as an appropriate location for future growth and development. Plan policy sets out land allocations for development and these are shown on the policies map along with other policy boundaries that are at the town.

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21. Strategic Policy – Honiton and its future development

The sites/areas listed below are potential sites for allocation at Honiton as shown on the Policies Map. On the policies map sites are colour coded to indicate whether they are preferred or 2nd choices sites and we also show sites that have been assessed and at this stage rejected as possible choices for allocation for development.

- Gitti_03 - Land on the western side of Hayne Lane, Gittisham, Honiton. The site is proposed for 5.5 ha of employment land and will form an extension to the existing Heathpark Industrial Estate.
- Gitti_04 - Land to the West of Combe Garden Centre, Gittisham, Honiton. The site is proposed for 9.1 ha of employment land and will form an extension to the existing Heathpark Industrial Estate.
- Honi_01 - Land at Heathfield, East of Hayne Lane, will form a small-scale residential extension on the South-West of Honiton to accommodate around 79 new homes.
- Honi_05 - Land to the north and south of King Street, will form a small-scale development in the centre of Honiton to accommodate around 40 new homes.
- Honi_06 – This land is the Former Millwater School at Bottom Road, Littleton, which will form a small-scale development in the south part of Honiton to accommodate around 30 new homes.
- Honi_07 - Land adjacent to St Michaels Church, will form a small-scale residential extension on the southern side of Honiton to accommodate around 30 new homes.
- Honi_10 - Land at Ottery Moor Lane, will form a small-scale residential extension on the northern side of Honiton to accommodate around 21 new homes.
- Honi_13 - Land at Middle Hill, Church Hill, will form a small-scale residential extension on the southern side of Honiton to accommodate around 10 new homes.
- Honi_14 - Land at Hurlakes, Northcote Hill, will form a small-scale residential extension on the eastern side of Honiton to accommodate around 30 new homes.
- GH/ED/39 - Land south of Northcote Hill, will form a medium-scale residential extension on the eastern side of Honiton to accommodate around 100 new homes.

In the event that all preferred allocations and 2nd choice sites being consulted on were allocated this would lead to the following:

Total new homes proposed for allocation at Honiton = 488

Total land area proposed for employment at Honiton = 14.6 hectares

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

- 1.210. The parish of Honiton has been designated as a neighbourhood plan area since 2015. An initial survey of residents and businesses was undertaken in 2017. Plan preparation is not understood to have progressed further, but there has been some renewed interest in recent times.

Suitability for development

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

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

- 1.212. On account of development constraints only modest development at Honiton (at this stage of plan making work) is proposed, though allocation is made (carrying forward an existing local plan allocation) for a substantive (around 15 hectares) area of land for employment uses to the west of the existing Heathpark industrial estate.
- 1.213. It is stressed that proposed allocations, at the time of drafting, are based on currently available evidence and initial site assessment work only. More detailed assessment work and evaluation may lead to amendments and refinement. All boundaries are shown as indicative only at this stage of drafting.
- 1.214. Whilst Honiton has many attributes that would point to it being a good location to look for a higher level of growth, particularly for new housing development, there are significant constraints on the outward expansion of the town. Though the major employment allocation for the town, extending to around 15 hectares in extent will offer scope to support growth into the longer term of a more substantive and strategic scale.

Ottery St Mary

1.215. The Local Plan strategy establishes Ottery St Mary as a Tier 2 settlement and as such as an appropriate location for future growth and development. Plan policy sets out land allocations for development and these are shown on the policies map along with other policy boundaries that are at the town.

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

The sites/areas listed below are potential sites for allocation at Ottery St Mary as shown on the Policies Map. On the policies map sites are colour coded to indicate whether they are preferred or 2nd choices sites and we also show sites that have been assessed and at this stage rejected as possible choices for allocation for development.

- **Otry_01** – this land at Barrack Farm, on the western side of Ottery St Mary, is proposed for a mixed-use development to provide around 70 new homes and 1.25 hectare of employment land.
- **Otry_09** – this land, which lies west of the town, adjacent to the sports centre and school, will provide 90 new homes.
- **Otry_10** – this land, which lies north and south of Salston Barton, is proposed for 20 houses.
- **Otry_15** – this garden site on the eastern side of the town at Slade Road is proposed for 8 houses.
- **GH/ED/27** – this land lies south of Strawberry Lane and is proposed for 60 houses.
- **GH/ED/29** – this land at Gerway Farm, off Sidmouth Road, is proposed for 40 houses

In the event that all preferred allocations and 2nd choice sites being consulted on were allocated this would lead to the following:

Total new homes proposed for allocation at Ottery St Mary = 288

Total land area proposed for employment at Ottery St Mary = 1.25 hectares

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

- 1.217. The neighbourhood plan for Ottery, adopted in July 2018, is a joint plan also covering the adjoining parish of West Hill. This plan therefore covers the 'Tier 2' town of Ottery St Mary as well as the identified 'Tier 4' Service Villages of West Hill and Tipton St John. The neighbourhood plan articulates community concern about the volume and design of new housing development consented in the period leading up to the adoption of the existing Local Plan, and a desire to ensure the response to on-going development pressure is balanced and local character maintained. The Plan's vision seeks to ensure any new developments are appropriately sited, well related, and contribute positively to the locality whilst meeting local needs and ensuring delivery of all necessary infrastructure.
- 1.218. The plan is particularly concerned with containing the settlements of Ottery and West Hill as separate entities, physically and visually. To this end, the plan identifies a 'settlement containment' area linked to policy. The southern section of the 'settlement containment' area is of much greater sensitivity, so it is proposed to designate this a Green Wedge in the local plan.
- 1.219. The need to address traffic issues in the town centre, and capacity of health and education provision, are also key concerns of the neighbourhood plan. The site adjacent to the King's School is safeguarded for education / community use in NP plan policy (NP24). Devon County Council advise that part of the site may be required for education purposes, and therefore this is retained in the local plan, but the remainder is available for housing which is understood to be necessary to help fund the education uses.

Suitability for development

- 1.220. As a Tier 2 settlement Ottery St Mary is considered suitable, in principle, for significant growth. The town lies outside of, but close to, the AONB on the south and west. Expansion to the north, south and east is heavily constrained by the narrow approach roads to the town, the extensive Conservation Area and settings of Grade 1 and 2* listed buildings, and the floodplain of The River Otter. Land to the west of the town is relatively unconstrained and there is potential for westward expansion, recognising that a green wedge has been designated to prevent coalescence between Ottery St Mary and West Hill village.
- 1.221. The proposed site for development land at Barrack Farm lies wholly within the 'settlement containment' area covered by Neighbourhood Plan policy NP4, however this development would not be seen in the context of West Hill due to topography, and the settlements would remain physically and visually separate.

Seaton

- 1.222. The Local Plan strategy establishes Seaton as a 'Main Centre' (Tier 2 settlement) and as such as an appropriate location for significant development to serve its own needs and that of wider surrounding areas. Plan policy sets out land allocations for development and these are shown on the policies map along with other policy boundaries that are at the town.

23. Strategic Policy – Seaton and its future development

The sites/areas listed below are potential sites for allocation at Seaton as shown on the Policies Map. On the policies map sites are colour coded to indicate whether they are preferred or 2nd choice sites and we also show sites that have been assessed and at this stage rejected as possible choices for allocation for development.

- Land at Barnards Hill Lane (Seat_02) is allocated for around 40 dwellings. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC, suitable avoidance/mitigation/compensation measures will need to be identified.
- Land off Harepath Road (Seat_05) is allocated for around 100 dwellings and 2.2 hectares of employment land. The employment land is located in the field immediately north of the existing Harepath Road Industrial Estate. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC, suitable avoidance/mitigation/compensation measures will need to be identified.
- Land at Clay Common (Seat_09) is allocated for around 7 dwellings.

In the event that all preferred allocations and 2nd choice sites being consulted on were allocated this would lead to the following:

Total new homes proposed for allocation at Seaton = 147

Total land area proposed for employment at Seaton = 2.2 hectares

What the settlement is like

- 1.223. Seaton is home to around 7,500 people, making it the fourth largest settlement in East Devon. It has one of the most elderly age profiles of any settlement in the district, with 45% of residents aged 65 or over. This is reflected in a relatively low potential workforce in Seaton. Nevertheless, the number of jobs in Seaton is lower than the number of workers (0.73 jobs per worker), meaning that many people have no option but to commute elsewhere to work. Just over a

third of residents work in Seaton, with Exeter, Axminster, and Sidmouth being the next most popular places to work.

- 1.224. Seaton has a wide range of community facilities, with a variety of shops, sports facilities, a library, GP, hospital, and regular bus service around the settlement and to areas elsewhere. However, it is missing some of the strategic facilities found in some other larger settlements, such as a train station and secondary school. The A3052 runs to the north of Seaton, with the strategic road network offering wider road links around 5 miles away.
- 1.225. Seaton is set within a stunning natural environment with the coast to the south (including the Jurassic Coast World Heritage Site), Seaton Wetlands along the eastern boundary, and the East Devon AONB located beyond to the east. Two scheduled monuments in close proximity indicate the high historic value in the area, along with a conservation area and several listed buildings in and around the town centre.

Key messages from the Neighbourhood Plan for the area

- 1.226. There is no neighbourhood plan available at the present time. The parish of Seaton was designated as neighbourhood plan area in 2016. Work on plan preparation has not progressed to date, although there has been some renewed interest in recent times.

Suitability for development

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

Sidmouth

- 1.228. The Local Plan strategy establishes Sidmouth as a Tier 2 settlement and as such as an appropriate location for future growth and development. Plan policy sets out land allocations for development and these are shown on the policies map along with other policy boundaries that are at the town.

24. Strategic Policy – Sidmouth and its future development

The sites/areas listed below are potential sites for allocation at Sidmouth as shown on the Policies Map. Sites are colour coded on the policies map to indicate whether they are preferred or 2nd choices sites and also where sites have been assessed and at this stage rejected as possible choices for allocation for development.

- **Sidm_01** - Land south west of Woolbrook Road, to the north west of Sidmouth, is proposed for 127 new homes and 0.51 hectare of employment land.
- **Sidm_06** - Land west of Two Bridges Road, Sidford. The proposed allocation is land to the east of the site only with a reduced site area at a much lower capacity than the original submitted site. The site would form a small-scale development to the north of Sidford to accommodate around 30 new homes.
- **Sidm_17** - Peak Coach House, (Numbers 1-3 Belfry Cottages), Cotmaton Road, to the south west coastal fringe of Sidmouth, is proposed for 11 new homes.

In the event that all preferred allocations and 2nd choice sites being consulted on were allocated, this would lead to the following:

Total new homes proposed for allocation at Sidmouth = 168

Total land area proposed for employment at Sidmouth = 0.51 hectares

What the settlement is like

- 1.229. Sidmouth is the second most populous settlement in East Devon, with around 13,300 people. 43% of residents are aged 65 or over, making it one of the most elderly settlements in East Devon and, consequently, relatively few working age people. There is currently a good balance of jobs to workers in Sidmouth (1 to 1) and, although it is relatively self-contained, there remains a significant

number of residents working elsewhere, with nearly one in five workers commuting from Sidmouth to Exeter.

- 1.230. There are a wide range of community facilities and services in Sidmouth, including a secondary school, numerous shops, health facilities, and a swimming pool. There are good bus links to other settlements, including three buses an hour to Exeter. However, unlike several of the other larger settlements, Sidmouth does not have a train station. The A3052 runs along the northern edge of Sidmouth, providing east to west road links; whilst the strategic road network (A30 and A35) can be accessed at Honiton around 10 miles to the north.
- 1.231. The East Devon Area of Outstanding Natural Beauty wraps itself tightly around three sides of Sidmouth, providing a picturesque setting for the town. To the south lies the beautiful beach, part of which is within the Jurassic Coast World Heritage Site. Sidmouth also has an outstanding historic environment, with much of the southern half of the town covered by conservation areas and home to numerous listed buildings.

Key messages from the Neighbourhood Plan for the area

- 1.232. Sidmouth is covered by the Sid Valley Neighbourhood Plan which was 'made' in late 2019. The plan's vision is to maintain and promote the rural and coastal beauty of the setting and local distinctive character of place, whilst encouraging a vibrant, more balanced and self-sustaining community and economy. It supports appropriate change that will bring local benefit and tackle key issues, such as lack of affordable housing.
- 1.233. The Plan generally seeks to prevent unnecessary encroachment of development beyond the settlement boundary. However, in recognition of the shortage of social and affordable homes, particularly for younger people and families, the plan adopts a cautiously positive policy stance to enable small scale 'exception' schemes for mixed affordable and market schemes. This is limited to such schemes which specifically meet identified local need and tie occupancy of both affordable and market homes to those with a connection to the parish. Notwithstanding this, the plan flags that development adjacent to the built up area at Sidmouth and Sidford in particular would require careful consideration, primarily in terms of the setting. At Sidford, the neighbourhood plan is also concerned with preventing settlement coalescence with Sidbury and the site considered here for allocation (reference Sidm_06) does fall within the identified "Sidford-Sidbury Non-Coalescence Area". Within this area, plan policy (3) considers development could only be acceptable if it would not impact on visual and physical separation of Sidford and Sidbury.
- 1.234. On all housing developments of 11 units or more, the Plan is prescriptive about the required make-up of schemes, by number of bedrooms and type of tenure, in order to align to local needs.

- 1.235. On other matters, the plan seeks to: retain existing employment sites; support the town centre to thrive and the redevelopment of the 'eastern town'/port royal; facilitate home working; protect designated Local Green Spaces and key views; support and enhance community facilities, and the built and natural environment.

Suitability for development

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

Local Centres

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

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

Plan policy sets out land allocations for development at the local centres and these are shown on the policies map along with other policy boundaries that are at the local centres.

25. Strategic Policy – Development at Local Centres

The sites/areas listed below are considered to be potential sites for allocation for development in/at East Devon's Local Centres. On the policies map sites are colour coded to indicate whether they are preferred or 2nd choices sites and we also show sites that have been assessed and at this stage rejected as possible choices for allocation for development.

Broadclyst

- **BrcI_09** - Land at Heathfield (Southeast of Woodbury View), Broadclyst, is proposed for 15 new homes.
- **BrcI_12** - Land west of Whimble Road, Broadclyst, is proposed for 136 new homes and 0.54 hectare of employment land.
- **BrcI_29** - Land to east of Town End, Broadclyst, is proposed for 24 new homes and 0.1 hectare of employment land (Site is adjacent to BrcI_12).

In the event that all preferred allocations and 2nd choice sites being consulted on were allocated this would lead to the following:

Total new homes proposed for allocation at Broadclyst = 175

Total land area proposed for employment at Broadclyst = 0.64 Ha

Budleigh Salterton

- **BudI_01** – Land adjacent to Clyst Hayes Farmhouse – Small parts of this site are a 'second choice' site for 50 new homes and 0.2 hectares of employment land.
- **BudI_02 and BudI_03 – Land at Barn Lane** are proposed as a 'second choice' allocation for 82 new homes and 0.3 hectares of employment land.
- **BudI_06 – Budleigh Salterton Community Hospital** is allocated for 20 new homes. This is a preferred allocation.

In the event that all preferred allocations and 2nd choice sites being consulted on were allocated this would lead to the following:

Total new homes proposed for allocation at Budleigh Salterton = 152

Total land area proposed for employment at Budleigh Salterton = 0.5 Ha

Colyton

- **Coly_02** – Land at Hillhead is proposed for 25 new homes on the northern part of the site as a preferred choice with a further 24 on the southern part of the site being considered as a 2nd choice site.

In the event that all preferred allocations and 2nd choice sites being consulted on were allocated this would lead to the following:

Total new homes proposed for allocation at Colyton = 49

Total land area proposed for employment at Colyton = 0 Ha

Lympstone

- **Lymp_01** - Little Paddocks, 22 Underhill Crescent, Lympstone, is proposed for 14 new homes.
- **GH/ED/72** - Land at Meeting Lane, Lympstone, is proposed for 131 new homes and 0.52 hectare of employment land.
- **GH/ED/73** - Land north west of Strawberry Hill, Lympstone, is proposed for 46 new homes and 0.18 hectare of employment land.
- **GH/ED/75** - Land off Grange Close, Lympstone, is proposed for 6 new homes.

In the event that all preferred allocations and 2nd choice sites being consulted on were allocated this would lead to the following:

Total new homes proposed for allocation at Lympstone = 197

Total land area proposed for employment at Lympstone = 0.7 Ha

Woodbury

- Land at Gilbrook (Wood_10) is allocated for around 60 dwellings and 0.24 hectares of employment land.
- Land south of Broadway (Wood_16) is allocated for around 67 dwellings and 0.27 hectares of employment land.
- Land east of Town Lane (Wood_20) is allocated for around 28 dwellings and 0.11 hectares of employment land.

In the event that all preferred allocations and 2nd choice sites being consulted on were allocated this would lead to the following:

Total new homes proposed for allocation at Woodbury = 155
Total land area proposed for employment at Woodbury = 0.62 Ha

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Broadclyst

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

- 1.240. The preparation of a neighbourhood plan for the entire parish of Broadclyst has long been under development and is now well advanced. The plan is currently at examination and is therefore progressing through the final stages of plan making alongside and ahead of the new Local Plan.
- 1.241. Unlike the majority of our neighbourhood plans, and in addition to the significant strategic growth the area has seen under the current Local Plan, the plan proposes multiple sites for development (housing, employment, community facilities) in various locations across the parish, including the same site (reference Brcl_09) proposed for allocation here by the emerging Local Plan at Broadclyst village. An employment allocation at Winter Gardens, Broadclyst is also adjacent to the more substantial proposed housing and employment allocation in this emerging Local Plan (site references Brcl_12 and Brcl_29).
- 1.242. Whilst also wanting to see local character and landscape protected, the draft Plan puts continuing to 'develop and thrive' and meet the 'changing and diverse needs' of its 'rapidly growing community' at the centre of its vision. The plan articulates concerns about pressure on services and infrastructure from the level and pace of new development in the vicinity. It is also generally ambitious in nature as it strives to maximise opportunities to respond to climate change and promote sustainability.
- 1.243. If site Brcl_09 is allocated through the making of the neighbourhood plan ahead of the new Local Plan, it is not expected that the new Local Plan would retain this allocation and would instead rely on the neighbourhood plan policy. On other sites allocated sites in the Local Plan, the neighbourhood plan policies could be utilised in helping to shape the development, including through any master-planning work undertaken.

Suitability for development

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

Budleigh Salterton

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

- 1.252. Budleigh Salterton parish has a neighbourhood plan, 'made' in 2017. The plan focuses on seeking to protect and enhance the existing qualities of the area (built and natural) and to further improvements in facilities/services and infrastructure to fulfil the wishes and meet the needs of the local community (primarily via a suite of identified 'community actions').
- 1.253. The plan supports a 'modest scale' of housing to meet local needs, aligned to the adopted Local Plan strategy for the town (to 2031), but does not make any further allocations itself. It does however designate 10 formal Local Green Spaces for protection, including the hospital garden, which is adjacent to but not the same as the site proposed for potential allocation for residential use (Budl_06). The neighbourhood plan also seeks to support small businesses to sustain themselves.
- 1.254. Overall, however, the plan focuses on seeking to ensure any development proposed does not have a detrimental impact on the form, character and setting of the area, with a particular focus on heritage and natural environment/green

space designations (including the surrounding AONB, and current green wedge).

Suitability for development

- 1.255. The exceptional landscape quality and coastal location of Budleigh Salterton constrains its potential for development. Furthermore, there is limited potential for employment growth to address the existing lack of opportunities for local employment, although it is close to Exmouth with good bus links. In terms of the scale of the settlement and its 'tier 3' status there is a case for promoting some development in the town.

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Colyton

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

- 1.259. A neighbourhood plan for the parish of Colyton was 'made' in January this year (2022). The Plan seeks to support sustainable growth in housing and population, including to ensure local needs are met, but does not allocate any sites. Instead, it relies on opportunities within the current Built up Area Boundary for Colyton, including the redevelopment of the Ceramtec site by Wainhomes. It is also supportive in principle of potential rural exceptions sites to deliver affordable housing, within strict criteria.
- 1.260. The neighbourhood plan has demonstrated strong community support for reinforcement of the Green Wedges to prevent coalescence of Colyton, Colyford and Seaton. It also includes policies to protect and enhance landscape setting, biodiversity, local character, and heritage, and to promote development of brownfield sites.

Suitability for development

- 1.261. The good level of services and facilities in Colyton suggest that it would be a good location in principle for some growth, although the majority of sites currently available for development are considered to be unsuitable. There is an outline planning permission for up to 72 new homes on previously developed land to the north west of the town (the Ceramtec site). One additional site is recommended for allocation. It is close to the town centre and well related to the existing settlement pattern, albeit elevated above the town.

Lympstone

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

- 1.265. The Lympstone Neighbourhood Plan (2015 to 2026) seeks to retain the rural identity of the parish, whilst supporting and furthering a functioning sustainable community. In recognition of local housing need, particularly for smaller homes for downsizers, the plan made its own allocations for 40 dwellings across 4 sites over the plan period, within the adopted Built-up Area Boundary of Lympstone.
- 1.266. The plan is generally supportive of continued small-scale piecemeal growth only, preferably on smaller sites (less than 10 dwellings), and to meet identified local housing needs. The plan also seeks an increase in workshop and storage space for small businesses, and protection and enhancement of community facilities and services.
- 1.267. Key aims of the plan in terms of consideration of future development include: preventing coalescence with Exmouth and resisting development in the current Green Wedge and Coastal Preservation Area; keeping agricultural land available for future food and energy production; furthering flood prevention, and; securing high quality, sympathetic and environmentally sustainable design.
- 1.268. Three of the four sites put forward here as proposed allocations (excepting site reference GD/ED/75) were also appraised during the process of preparing the neighbourhood plan for allocation within it and were discounted at that time (save for an area already consented at GD/ED/73 for 15 homes).
- 1.269. An exercise to review the neighbourhood plan was undertaken last year (2021), but work has not yet commenced on any revised or replacement plan.

Suitability for development

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

Woodbury

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

- 1.276. Woodbury parish was designated as a neighbourhood plan area in 2013. A pre-consultation draft was shared informally with EDDC officers for comment in 2021 and since that time, a health check has been undertaken by an independent examiner. This document is not yet published and work by a Steering Group is said to be on-going to finalise a consultation draft. Whilst it would not be appropriate to quote draft content that is not in the public domain, suffice is to say that the plan is not currently anticipated to put forward land for development. The development put forward in this emerging Local Plan through proposed allocations here would likely be at odds with the emerging neighbourhood plan vision/strategy.

Suitability for development

- 1.277. The wide range of local facilities and services in Woodbury make it an appropriate place for development to meet local needs and those of immediate surrounds. The current relative lack of jobs in Woodbury provides justification for employment land to be delivered alongside housing. The central part of Woodbury is of high historic value, but there are no landscape or biodiversity designations in the immediate vicinity of the settlement. Beyond this, the East

Devon AONB is around 500m from the eastern edge of Woodbury. Further still are the European sites of the Pebblebed Heaths 1.5km to the east, and the Exe Estuary nearly 3km to the west.

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Service Villages

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

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

Plan policy sets out land allocations for development at service villages and these are shown on the policies map along with other policy boundaries that are at or close to these villages.

26. Strategic Policy – Development at service villages

The sites/areas listed below are considered to be potential sites for allocation for development in/at East Devon's service villages. These are listed by settlement with a potential total number of homes and land area for employment spaces for that settlement listed beneath. These totals are in the event that all identified site options within that settlement were to come forward as allocations.

Beer

No allocation sites have been identified in Beer

Total new homes proposed for allocation at Beer = 0

Total land area proposed for employment at Beer = 0 Ha

Branscombe

No allocation sites have been identified in Branscombe.

Total new homes proposed for allocation at Branscombe = 0

Total land area proposed for employment at Branscombe = 0 Ha

Broadhembury

- **Brhe_09** – Land opposite the Village Hall, is a 'second choice' allocation for 10 homes.

Total new homes proposed for allocation at Broadhembury = 10

Total land area proposed for employment at Broadhembury = 0 Ha

Chardstock

- **Char_04** - Land off Green Land, Chardstock, is proposed for 30 new homes and 0.12 hectare of employment land.

Total new homes proposed for allocation at Chardstock = 30

Total land area proposed for employment at Chardstock = 0.12 Ha

Clyst St Mary

- **Sowt_03** - Land north of Sidmouth Road, Clyst St Mary, is proposed for 37 new homes and 0.15 hectare of employment land.
- **Sowt_09** - Land at Bishops Court Lane, Clyst St Mary, is proposed for 35 new homes and 0.14 hectare of employment land.

- **Sowt_11** - Land at Bishops Court Lane, Clyst St Mary, is proposed for 30 new homes and 0.12 hectare of employment land.

Total new homes proposed for allocation at Clyst St Mary = 102

Total land area proposed for employment at Clyst St Mary = 0.41 Ha

Dunkeswell

- **Dunk_05** – Broomfields, Dunkeswell, is proposed for 43 new homes and 0.17 hectare of employment land.

Total new homes proposed for allocation at Dunkeswell = 43

Total land area proposed for employment at Dunkeswell = 0.17 Ha

East Budleigh

No allocation sites have been identified in East Budleigh

Total new homes proposed for allocation at East Budleigh = 0

Total land area proposed for employment at East Budleigh = 0 Ha

Exton

- Land west of Oaklands (Wood_01) is allocated for around 17 dwellings.
- Land north and east of Exton Farm (Wood_28) is allocated for around 33 dwellings and 0.13 hectares of employment land.

Total new homes proposed for allocation at Exton = 50

Total land area proposed for employment at Exton = 0.13 Ha

Feniton

As 2nd best site choices at Feniton could accommodate a substantial number of homes, and their possible identification or allocation for development could have significant impacts on or in relation to plan strategy, we are waiting until redrafting of this report for the 1 November 2022 committee meeting until this Feniton text is completed.

Hawkchurch

- **Hawk_01** – Norton Store, Hawkchurch, Axminster, is proposed for 38 new homes and 0.15 hectare of employment land.

Total new homes proposed for allocation at Hawkchurch = 38

Total land area proposed for employment at Hawkchurch = 0.15 Ha

Kilminster

- **Kilm_09** - Land east of George Lane, is a preferred allocation for 37 homes.
- **Kilm_10** - Land to the west and south west of the Old Inn, is a 'second choice' site for 5 new homes.
- **Kilm_11** - Land to the east of and off Whitford Road, between Ashes Farm and The Beacon Chapel, is a preferred allocation for 10 homes.

Total new homes proposed for allocation at Kilminster= 52

Total land area proposed for employment at Kilminster= 0 Ha

Musbury

- **Mus_01 Baxter's Farm** – Part of this site is allocated for 15 new homes with employment uses on a small part of the site fronting the A358, as provided for in the Baxter's Farm Development Brief. This is a preferred allocation.
- **Mus_02** – Part of this site is allocated for 10 new homes as a 'second choice' site.

Total new homes proposed for allocation at Musbury = 25

Total land area proposed for employment at Musbury = 0 Ha

Newton Poppleford

No allocation sites have been identified in Newton Poppleford.

Total new homes proposed for allocation at Newton Poppleford = 0

Total land area proposed for employment at Newton Poppleford = 0 Ha

Otterton

- **Otto_01 Land east of Hayes Close** – is a 'second choice' allocation for 10 homes.

- **Otto_02 Land adjacent to the North Star** – is a ‘second choice’ allocation for 8 new homes
- **Otto_03 Land at Hayes Lane** – part of this site is a ‘second choice’ allocation for 5 new homes.

Total new homes proposed for allocation at Otterton = 23

Total land area proposed for employment at Otterton = 0 Ha

Payhembury

No allocations are proposed for Payhembury

Total new homes proposed for allocation at Payhembury = 0

Total land area proposed for employment at Payhembury = 0 Ha

Plymtree

No allocations are proposed for Plymtree

Total new homes proposed for allocation at Plymtree = 0

Total land area proposed for employment at Plymtree = 0 Ha

Sidbury

- **Sidm_34** – Land South of Furzehill, Sidbury, is proposed for 38 new homes.

Total new homes proposed for allocation at Sidbury = 38

Total land area proposed for employment at Sidbury = 0.15 Ha

Stoke Canon

No allocations are proposed for Stoke Canon

Total new homes proposed for allocation at Stoke Canon = 0

Total land area proposed for employment at Stoke Canon = 0 Ha

Tipton St John

- **Otry_04** Land South of Otter Close Tipton St John is a ‘second choice’ allocation for 45 homes.

Total new homes proposed for allocation at Tipton St John = 45

Total land area proposed for employment at Tipton St John = 0 Ha

It should be noted that in the event that land is allocated in Ottery St Mary for the relocation of the primary school in Tipton St John then the village would no longer

meet the threshold for a Tier 4 settlement and this potential allocation would not be taken forward.

Uplyme

No allocations are proposed for Uplyme.

Total new homes proposed for allocation at Uplyme = 0

Total land area proposed for employment at Uplyme = 0 Ha

Westclyst

No allocation sites have been identified in Westclyst

Total new homes proposed for allocation at Westclyst = 0

Total land area proposed for employment at Westclyst = 0 Ha

West Hill

- Land adjoining Wind Mill Lane (West_04) is allocated for around 26 dwellings and 0.1 hectares of employment land.
- Land north and east of Eastfield is allocated for around 25 dwellings and 0.1 hectares of employment land.

Total new homes proposed for allocation at West Hill = 51

Total land area proposed for employment at West Hill = 0.2 Ha

Whimble

As 2nd best site choices at Whimble could accommodate a substantial number of homes, and their possible identification or allocation for development could have significant impacts on or in relation to plan strategy, we are waiting until redrafting of this report for the 1 November 2022 committee meeting until this Whimble text is completed.

Beer

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

- 1.281. Beer has had a 'made' neighbourhood plan in place since January 2019. This seeks to sustain Beer as a vibrant and strong community and included the allocation of a site for 31 homes (since successfully developed by its Community Land Trust). The Plan is supportive of community-led development and small-scale schemes to deliver affordable and accessible housing to meeting local needs. However, this must not compromise the unique character, landscape and setting of Beer. To this end, the plan includes reinforcement of the green wedge to prevent coalescence with Seaton together with protection of the undeveloped coast and numerous heritage and environmental assets.

Suitability for development

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

the Local Plan although a Built up Area Boundary will be designated around the existing village.

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Branscombe

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

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

Suitability for development

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

Broadhembury

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

- 1.290. A neighbourhood area was designated for the parish of Broadhembury in 2014. Work on drafting a Neighbourhood Plan has been undertaken but paused in recent years to allow a Community Land Trust to be established and to consider potential sites for affordable housing delivery. The neighbourhood plan has not gone through any formal consultation and finding sites for community-led development has proven difficult. However, indications are that the community would prefer a small, single site for development primarily aimed at meeting need for several affordable houses.

Suitability for development

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

Chardstock

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

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

Clyst St Mary

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

- 1.298. Clyst St Mary is covered by the neighbourhood plan for the parish of Bishops Clyst (Clyst St Mary and Sowton) which was 'made' in 2017. This recognises the on-going development pressure in the area, as well as the constraints, and seeks to secure a positive impact from any new development.
- 1.299. In respect of Clyst St Mary village specifically, the aim of the plan is to protect the surrounding countryside, green spaces and trees, and retain a village feel with a clear separation from Exeter. Retention of valued facilities/services and improvements in provision, flood prevention and management, alleviating issues associated with traffic and supporting safe walking and cycling opportunities also feature strongly.
- 1.300. Smaller homes was identified as a particular need locally, but at the time of plan writing there was no support for further housing development beyond the adopted Local Plan allocation for 150 homes at the Winslade Park site during the plan period to 2031. Similarly, whilst existing businesses uses are supported, commercial development beyond the existing areas and brownfield sites is not, and retention of land in agricultural use is sought.
- 1.301. Work is currently underway on reviewing the plan, including independent consideration of potential and alternative sites for development.

Suitability for development

- 1.302. Clyst St Mary is considered an attractive location to accommodate growth due to the range of services and facilities it offers alongside its proximity to Exeter and other employment opportunities, which could potentially be accessed by sustainable modes of transportation.

- 1.303. However, this needs to be weighed against the development which it has experienced in recent years and is still to come, alongside proposals for larger scale development in close proximity in the form of a potential new town which could impact upon the village. The A3052 in particular suffers from long tailbacks at peak times to junction 30 and this needs to be considered.

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Dunkeswell

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

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

Suitability for development

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

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East Budleigh

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

- 1.313. East Budleigh is covered by the East Budleigh with Bickton Neighbourhood Plan, 'made' in 2017. Recognising the setting within the AONB and the significant local heritage, the plan primarily seeks to protect the existing character and ensure any development respects this and does not detract from it.
- 1.314. A range of green areas across the village are formally designated as Local Green Spaces for the additional protection that brings from development, and protection and enhancement of existing community facilities is a key theme to support sustainable living and a sense of community. The constraints of areas prone to flooding and of high-grade agricultural land in the immediate vicinity of the village are also highlighted. Following a pilot exercise with EDDC, work flowing from this neighbourhood plan has also seen local heritage assets meeting specific criteria registered on our Local List for additional protection.
- 1.315. Overall, only small-scale development utilising previously developed land and/or to meet local needs is supported, subject to this being of minimal impact to, or enhancing, the locality.

Suitability for development

- 1.316. East Budleigh is a self-contained, compact village and the range of services and facilities makes it suitable for small-scale additional development. The village is located in the East Devon AONB and has a considerable number of heritage assets.
- 1.317. Sites at the village that were assessed are not considered appropriate to accommodate growth.

Exton

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

- 1.321. Exton lies in the parish of Woodbury which was designated as a neighbourhood plan area in 2013. A pre-consultation draft of the neighbourhood plan was shared informally with EDDC officers for comment in 2021 and since that time, a health check has been undertaken by an independent examiner. The document is not yet published and work by a Steering Group is understood to be on-going to finalise a consultation draft. Whilst it would not be appropriate to cite the document at this stage, suffice is to say it is not currently anticipated to propose any sites for development at the village of Exton, and is likely to raise concerns about traffic and flooding in this location.

Suitability for development

- 1.322. Although Exton has good sustainable travel links to larger places elsewhere, the relative lack of facilities within the settlement itself limits the amount of new housing that would be sustainable at the village. The Exe Estuary (Special Protection Area/Ramsar) to the west and Lympstone Commando to the south, make the north and east the only realistic potential locations for new development beyond the existing village.

Feniton

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

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

Suitability for development

- 1.329. The railway station at Feniton and relative proximity to Exeter indicates some reasonable suitability for development. However the village is accessed by country lanes and has a history of flooding, albeit there has been past alleviation work and there are future plans for future work. In addition, Feniton has the lowest ratio of jobs to workers of any settlement, and a level of facilities commensurate with its role as a 'service village'. Therefore, adding a significant number of new homes without employment or other facilities may encourage travel to other places, contrary to sustainability objectives.

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Hawkchurch

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

- 1.331. There is currently no neighbourhood plan for Hawchurch. However, the parish of Hawchurch was designated a Neighbourhood Area in 2015 and work restarted in 2021 with a new Steering Group in place to progress a neighbourhood plan. Community consultation and evidence gathering is understood to be on-going.

Suitability for development

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

Kilminster

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

- 1.336. Kilminster is the subject of neighbourhood plan for the whole of Kilminster parish which has successfully passed examination and referendum stage and is expected to be 'made' in October this year (2022).
- 1.337. Objectives of the plan include:
- ensuring housing growth is of a scale that is appropriate to the village's role and function and does not adversely impact upon the ability to accommodate demand on facilities and infrastructure, and;
 - to support housing development which meets the identified needs of the local community across types and tenures, whilst meeting changing demographic and social requirements.
- 1.338. To this end, the plan allocates two sites for residential development to meet identified local needs. These sites both fall within two sites (references Kilm_09 and Kilm_11) identified in this emerging Local Plan as proposed preferred allocations. The neighbourhood plan policies include specific requirements for these sites, including to secure accessible housing for older residents and affordable homes, together with enhancements to the green 'buffer' along the A35 and to footpath links within the village and set out detailed design criteria. The neighbourhood plan is seeking to support continued 'slow, incremental growth', which will support the vitality of the village, whilst not exacerbating traffic issues.
- 1.339. As the neighbourhood plan is coming forward ahead of the Local Plan, further consideration will need to be given to the relationship and the best approach to bringing the land forward in these locations, as well as to any phasing. The neighbourhood plan includes requirements that could be used in any master-planning/development briefs.

Suitability for development

- 1.340. Kilmington has a good range of services and facilities that make it suitable for limited development in principle. However, most of the parish lies within AONBs, which constrained the development options. Most facilities are located to the north and east of the settlement and access is constrained by the very narrow, unlit, unsurfaced roads to the south and west of the village. Sites in those directions are less accessible and more visually harmful, due to topography and designated landscapes.

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Musbury

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

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

Suitability for development

- 1.344. Although Musbury is quite a small settlement, it has a good range of local facilities that make it suitable in principle for some modest development and housing allocations are shown in the draft local plan.

Newton Poppleford

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

- 1.348. Newton Poppleford is covered by the neighbourhood plan for the parish of Newton Poppleford and Harpford, 'made' in 2021. The plan articulates how flooding and traffic-related matters are key concerns for the local community. It supports the current approach to the Built-up Area Boundary (BUAB) in the adopted Villages Plan, excluding the western end of the village entirely, and seeks to preserve the rural character, AONB landscape setting and local heritage. Taking into account the number of new homes permitted in recent years and the constraints to development identified, the plan found no need to allocate sites. Instead, it supports small-scale incremental development to meet identified local needs, particularly of smaller, affordable and/or accessible homes within or adjacent to the current BUAB, subject to meeting an extensive set of design and other criteria/requirements for new development.
- 1.349. The vision seeks a vibrant community and as such it also supports increased employment opportunities locally and retention and enhancement of community facilities and services. In particular, the plan seeks improvement in provision of local healthcare/medical facilities as well as traffic and pedestrian movement

and identifies several valued 'assets' for specific protection, including Local Green Spaces, heritage assets, 'cherished public views', and community facilities and services.

Suitability for development

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

Otterton

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

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

Suitability for development

- 1.356. Whilst Otterton has some services and facilities that make it suitable for limited development in principle, it is heavily constrained by its high quality AONB landscape and heritage assets. Three sites have been identified as 'second choice' allocations, but further work will be needed on landscape assessment, flooding, highways and impact on the setting of heritage assets.

Payhembury

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

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

Suitability for development

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

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Plymtree

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

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

Suitability for development

- 1.368. Although in a rural location, Plymtree contains a range of services and facilities and is consequently considered appropriate to accommodate a small level of growth in the Local Plan.

Sidbury

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

- 1.372. The village of Sidbury is covered by the Sid Valley neighbourhood plan, for the parished area of Sidmouth, 'made' in 2019. The plan's vision is to maintain and promote the rural and coastal beauty of the setting and local distinctive character of place, whilst encouraging a vibrant, balanced and self-sustaining community and economy. It is supportive of appropriate change that will bring local benefit and tackle key issues such as lack of affordable housing. In respect of Sidbury specifically, the plan is concerned with preventing settlement coalescence with Sidford and identifies a "Sidford-Sidbury Non-Coalescence Area". The possible site for allocation at Sidford (site reference Sidm_06) is largely within this area.

Suitability for development

- 1.373. The availability of a decent range of community facilities and services make Sidbury an appropriate place in principle for a reasonable level of development. However, being located entirely in the AONB limits the potential for new development. In addition, the lack of dedicated footpaths in the village make it challenging for pedestrians, particularly along the A375 which gets busy at times and can be a safety hazard for walkers. The lack of jobs in the village mean the scale of housing should also be limited to minimise the potential for unsustainable commuting patterns.

Stoke Canon

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

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

Suitability for development

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

Tipton St John

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

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

Suitability for development

- 1.385. Tipton St John is a settlement which is suitable for a very small scale of additional development due to its rural location (accessed along unlit, unsurfaced rural lanes), topography, tendency to flood and high landscape

quality. If the village school relocates away from the village then it will fall below the threshold for facilities and services which justify its allocation as a tier 4 settlement.

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Uplyme

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

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

Suitability for development

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

Westclyst

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

- 1.392. Westclyst and immediate surroundings fall largely within the parish of Broadclyst, the whole of which is the subject of a submitted neighbourhood plan currently at examination. This plan is therefore progressing through the final stages of plan making, alongside and ahead of the new Local Plan.
- 1.393. The draft neighbourhood plan refers to the significant and rapid strategic growth the area has seen under the current Local Plan strategy, which will make Westclyst a larger settlement than Broadclyst Village. It comments on the pressures on services and infrastructure and changes in nature/feel of the area that this has brought.
- 1.394. Whilst also wanting to generally see local character and landscape of the parish protected and enhanced, the plan puts forward multiple sites for development (housing, employment, community facilities) in various locations in the parish. This strategy furthers the vision to continue to 'develop and thrive' and meet the 'changing and diverse needs' of its 'rapidly growing community'.
- 1.395. Although no development sites are proposed within the plan at Westclyst, the draft plan contains various policy clauses and aspirations relating to the Westclyst area specifically, including:
- Support for provision of active travel links within and beyond the parish connecting to/from Westclyst.
 - Support for infill for self-build development
 - Protection of several wooded areas as 'green corridors'
 - A requirement for development proposals to enhance the urban landscape through greening and biodiversity measures.
 - Suggestion it might be a suitable location for a workhub development.

Suitability for development

- 1.396. In principle, given the range of accessible facilities and proximity to Exeter the area would be an appropriate location for future growth.
- 1.397. However, although development at Westclyst was a feature of the existing local plan and in principal could accommodate further development, no suitable sites have been presented and so it is not considered appropriate to make any allocations at this point in time.

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West Hill

What the settlement is like

- 1.398. West Hill is a post-war village characterised by large, detached houses in spacious plots, interspersed with numerous trees and woodland. Key facilities are the primary school, village hall and shop, all located close to each other in the northern part of the village. This means that some houses are over a 1 km away from these facilities, often along narrow, steep and unlit roads that lack pavements.
- 1.399. West Hill has around 2000 residents, with 36.5% aged over 65 (higher than the district average). Around 2/3 of workers commute out of the village to work.
- 1.400. The nature of existing housing stock in West Hill makes it amongst the most expensive settlements to live in East Devon.

Key messages from the Neighbourhood Plan for the area

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

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

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

Suitability for development

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

Whimble

What the settlement is like

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

Key messages from the Neighbourhood Plan for the area

- 1.409. There is no neighbourhood plan for Whimble currently. However, the whole parish of Whimble is designated as a neighbourhood area and work has recently recommenced on preparation of a neighbourhood plan. Several rounds of community consultation to inform drafting of the plan have been undertaken.

Suitability for development

- 1.410. Proximity to Exeter and the presence of a railway station are positive factors in respect of potential suitability for future development. However there are narrow lanes in and serving the village and also heritage sensitivities in respect of its historic core.

7. Tackling the climate emergency and responding to climate change

Reducing emissions and promoting zero carbon development

- 1.411. The climate is in crisis. The latest warnings from the 2021 IPCC sixth assessment report ⁶ are stark. Human-induced climate change is already affecting many weather and climate extremes in every region across the globe, the atmosphere and seas are warming at rates unprecedented in human history, and some of the consequences are irrevocable. Time is running out and these trends are set to continue without drastic cuts in carbon emissions in the next decade. It is clear that now is the time for bold collective action.
- 1.412. No organisation or individual is exempt from responsibility, and in 2019 the Council declared a climate emergency where it committed to become carbon neutral by 2040. The Local Plan has a key role to play and it is imperative that we go further than ever before by introducing a suite of ambitious and implementable policies which addresses the severity of the crisis that we are all facing.

27. Strategic Policy – Climate Emergency

The East Devon target is to become carbon neutral by 2040, this overarching strategic policy for climate emergency requires developments to support East Devon becoming carbon neutral by 2040, through

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

- 1.413. The policy provides an overarching view and sets a target of achieving carbon neutrality in the district by 2040, in line with the Council's declaration of a climate emergency. The subsequent policies in this chapter provide more specific deliverables as to how the overarching policy will be met.

⁶ IPCC, 2021, Sixth Assessment Report, <https://www.ipcc.ch/report/ar6/wg1/>

28. Strategic Policy – Net-Zero Carbon Development

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

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

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

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

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

Figure xxx: The Energy Hierarchy



29. Strategic Policy – Promoting renewables and zero carbon energy

Development of zero carbon and renewable energy schemes within the District will be supported. We will encourage the use of community-led schemes and promote their use within Neighbourhood Plans.

The Local Plan will support renewable and low carbon energy proposals where there are no unacceptable impacts on:

- Landscape, visual or residential amenity
- Noise, air, water, highways or health
- Biodiversity, the natural or historic environment
- Radar, telecommunications or the safety of aircraft operations

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

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

Solar energy and electricity generation

- 1.420. Solar energy has become increasingly important in supplying electricity and of lesser importance for direct heating in recent years. Many smaller-scale installations, for example on the roofs of some residential dwellings, do not require planning permission. However, large-scale solar farm installations would require permission and can be, unless sensitively sited and designed, intrusive in the landscape.
- 1.421. Plan policy sets out considerations with respect to supporting new solar installations.

- 1.422. The Low Carbon Study has identified areas which are suitable for solar photovoltaic development, which excluded the most sensitive areas of the District, such as AONB, greenspace, heritage and natural features. It should be noted that the proposed maps do not exclude areas on the basis of 2 km proximity to grid connection as the connection can be achieved beyond this range. Also not factored into the mapping is agricultural land classification as reliable information does not exist for the vast majority of the district. A full outline of how the layers were formulated can be found in the Low Carbon Study.
- 1.423. The policy does not intend to cover retrofitting existing residential and commercial buildings with solar panels as this can largely be achieved through permitted development rights. Where there are schemes that fall outside what is allowed under permitted development, these would be covered under policy 29.

30. Strategic Policy – Suitable areas for solar energy developments

Solar photovoltaic development will be supported in the identified solar energy suitable area, as shown on the Policies Map, where there are no unacceptable impacts on:

- Landscape, visual or residential amenity
- Noise, air, water, highways or health
- Biodiversity, the natural or historic environment
- Radar, telecommunications or the safety of aircraft operations

- 1.424. The scale of resource available for solar energy within East Devon is vast and despite some schemes coming forward, remains largely untapped. The intention of this policy will be to create an environment which gives certainty to the industry as to where schemes will be acceptable, which should translate into a greater number of schemes coming forward.

Energy from wind and wind farms

- 1.425. Windfarms can be found on-shore and off-shore, sometimes many miles out to sea. Off-shore windfarms largely fall outside of the remit of the Council as the relevant planning authority, though there may be planning implications associated with any on-shore infrastructure or connections that are required.
- 1.426. Plan policy sets out considerations in respect to supporting new on shore windfarms.

31. Strategic Policy – Suitable areas for wind energy developments

Wind energy development will in principle be supported in the identified wind energy suitable area, as shown on the Policies Map, where there are no unacceptable impacts on:

- Landscape, visual or residential amenity
- Noise, air, water, highways or health
- Biodiversity, the natural or historic environment
- Radar, telecommunications or the safety of aircraft operations

The impacts of the development on key landscape characteristics must be acceptable. Proposals must have regard to the landscape sensitivity and be of a scale and type where landscape sensitivity has been identified as being low/moderate or moderate.

- 1.427. Government guidance also requires that for on-shore wind energy to come forward at all, suitable areas need to be identified in the development plan. Whilst the scale of the area suitable for development is far more constrained than solar, there are still some areas of potential.
- 1.428. The area suitable for wind energy development has been identified in the Low Carbon Study. They exclude the most sensitive areas of the District, such as AONB, greenspace, heritage and natural features. It should be noted that the proposed maps do not exclude areas based on 2 km proximity to grid connection as the connection can be achieved beyond this range. Also not factored into the mapping is agricultural land classification as reliable information does not exist for the vast majority of the district. A full outline of how the layers were formulated can be found in the Low Carbon Study.

Energy storage

- 1.429. One of the challenges associated with renewable energy generation is that when it is 'made' is not necessarily at the same time as when consumers want to use it. Much of the electricity consumed by households is done so in the evening, often after sunset, but this of course is the time when solar panels cease to generate electricity or at least production starts to rapidly fall.
- 1.430. Policy in the plan therefore sets out considerations that are relevant to storage of electricity.

32. Strategic Policy – Energy Storage

Planning permission will be granted for energy storage facilities to help to achieve carbon neutrality and support renewable energy production and use in East Devon subject to such schemes not having adverse impacts on account of noise, environmental considerations or amenity impacts.

- 1.431. Energy storage technologies (including battery storage) allow surplus electricity to be stored as other forms of energy until it is required when it can be re-released as electricity. This will be an essential part of speeding up the replacement of fossil fuels with renewable energy. Electricity storage is a key technology in the transition to a smarter and more flexible energy system and will play an important role in helping to reduce emissions to net[1]zero by 2050. Battery storage systems will play an increasingly pivotal role in responding to changing electricity demands, particularly as we make the transition from petrol to electric vehicles and shift demand from peak times.
- 1.432. Storage encompasses a wide range of technologies. Lithium-ion batteries and pumped hydroelectric are the dominant technology types for storage schemes at present. Favoured locations have tended to be close to a suitable sub-station in order to provide grid services. In addition, storage co-located with renewables is an emerging business model that may see more uptake in the near future.



Figure 1: Example battery storage facility

Strategic heat networks

- 1.433. Strategic heat networks are created from systems where a central plant or plants will generate heat and this will then be distributed along pipe networks to residential, business and other consumers. Strategic heat networks provide a more efficient way of producing heat than individual properties having their own separate boilers.

33. Strategic Policy – Heat Networks

For all major developments proposed within 1km of an existing heat network a connection will be required in order to secure planning permission. In addition, where no heat network currently exists, a new heat network will be required for proposals above 1,200 homes or 10 ha of commercial floorspace.

- 1.434. In Denmark 60% of heating in homes is supplied using district heat networks. These have been remarkably successful in producing a low cost and highly efficient heat supply. In the UK, heat networks are still in their relative infancy and whilst there are currently only a few examples, the Committee on Climate

Change (CCC) suggest that 20% of heating will need to come from district heating by 2050 if climate targets are to be met⁷.

- 1.435. East Devon is well placed to embrace this trend, with networks already operating at the west end of the District at Cranbrook and Monkerton in Exeter.
- 1.436. The GESP low carbon study considered the location of many large users of electricity and heat within the district that could potentially present opportunities for matching heat supply and demand, or otherwise incentivise the formation of a district heat network, so that this energy would not be wasted. It also provides an evidence base suggesting that any large scale development over 1,200 or 10ha of dwellings should investigate the potential to deploy a heat network.
- 1.437. The Local Plan will likely be making large scale allocations within the District to meet housing requirements and these will present opportunities to utilise waste heat and connect to existing networks to increase their efficiency and reliability.

Embodied carbon

- 1.438. One of the major sources of greenhouse gases is the manufacture of building materials. We see, therefore, real benefits in using all or key parts of the existing building stock in development projects.

34. Strategic Policy – Embodied carbon

All developments shall demonstrate actions taken to reduce embodied carbon and developers should retain existing buildings, or at least the foundations unless it can be demonstrated that refurbishment is either unviable or impractical. Replacement of existing habitable buildings will only be supported in exceptional circumstances and will need to demonstrate that the full lifecycle carbon emissions will be net-zero.

- 1.439. There is an increasing realisation and awareness of the environmental impact of producing the materials required for construction. Making steel, concrete and bricks for buildings creates a vast amount of CO₂, with concrete alone causing 8% of global emissions. Indeed, The Royal Institution of Chartered Surveyors (RICS) estimates that 51% of the lifecycle carbon from a typical residential dwelling is emitted before the building is even occupied. The figure for office

⁷ The future of heating in UK buildings, [Infographic - The future of heating in UK buildings \(theccc.org.uk\)](https://theccc.org.uk/infographic-the-future-of-heating-in-uk-buildings)

development is 35%⁸. Much of that energy goes below the ground into the foundations of the buildings.

- 1.440. A recent report steered by the Royal Academy of Engineering has urged for existing buildings to be left standing rather than demolished⁹ and the Government has committed to producing a building strategy which will be looking to tackle this issue.
- 1.441. Examples of exceptional circumstance could be that the footprint of the existing building is impractical for the proposed use or the density of development is to be greatly increased as a result of the proposed development.

Adapting to environmental changes and managing environmental hazards

- 1.442. Flood risk, coastal change, water supply and pollution are related to dynamic natural systems but can also be affected by human activities. For example, development upstream can increase the likelihood of flooding downstream or industrial processes can pollute drinking water supplies. We need to understand and plan for environmental change, aspects of which are likely to be exacerbated by climate change. To inform work on the environmental challenges the local plan needs to confront, we have commissioned studies relating to coastal change, flood risk and impacts of development levels on the water cycle to inform our approach and policies. Our evidence base relating to coastal change is complete, but we are awaiting the water cycle study and strategic flood risk assessment (level 1). It was hoped that initial findings would be available in time to inform this draft plan, but work has been delayed because data requests to South West Water have yet to be actioned. Subject to these issues being resolved, both the level 1 strategic flood risk assessment and the water cycle study should be completed early in 2023, in time to inform the next stage of plan making. This draft plan uses existing flood mapping to help inform allocations.

Flood Risk

- 1.443. The NPPF makes clear that development should be directed away from areas at highest risk of flooding now and in the future. The level 1 strategic flood risk

⁸ Whole life carbon assessment for the built environment, RICS, 2017, <https://www.rics.org/globalassets/rics-website/media/news/whole-life-carbon-assessment-for-the--built-environment-november-2017.pdf>

⁹ Decarbonisation construction: building a new net zero industry, Royal academy of engineering, 2021, <https://www.raeng.org.uk/publications/reports/decarbonising-construction-building-a-new-net-zero>

assessment will help us to show how this can be done. It will (amongst other things): set out the relevant issues; give advice on the need for local policies; highlight any cross-boundary issues; identify any land needed for future flood risk solutions and map flood risk from all sources for the whole of East Devon. A level 2 strategic flood risk assessment may be required to inform strategic allocations at the next plan making stage. This draft plan generally avoids areas currently known to be at risk of flooding, although there are areas within existing settlements that are at risk of flooding that may be considered suitable for redevelopment, subject to detailed flood risk assessments (in a level 2 strategic flood risk assessment). Additionally, the settlement boundaries have not been drawn to specifically exclude areas at risk of flooding, although the relevant policy is clear that proposals for development within the boundaries will need to be assessed against other relevant plan policies. There is extensive national policy on flooding, which was recently updated. We will need to await the outcome of the strategic flood risk assessment before drafting any flood related policies that are necessary in an East Devon context.

Water quality and supply

- 1.444. The water cycle study will examine and provide recommendations on a range of issues including: the capacity for wastewater infrastructure to accommodate additional development; the need for improvements to wastewater infrastructure to facilitate additional development; the impact of development on water supply and quality; the environmental impact of development on the water environment and a 'phosphate calculator' to show how Natural England's requirements in the River Axe catchment can be met. The results of the water cycle study may feed into site allocations and is likely to underpin plan policies relating to water quality and supply.

Coastal change

- 1.445. The impact of a changing coastline, particularly through cliff erosion and increased risk of permanent coastal flooding (inundation), is a challenging issue for East Devon. We can readily see along some lengths of the East Devon coastline that the cliffs and coastline more generally is eroding. This is a natural process, though one that has and will increase as a result of increasing temperatures and sea level rise. In some cases, coastal defence work may be appropriate, for example to defend parts of coastal towns, though often it is very expensive and can have adverse environmental impacts. Along much of the East Devon coastline, however, the appropriate action is not to intervene and let natural processes happen. This plan needs to identify the impacts of any potential changes and develop policies to ensure that the risks are properly considered when making decisions on whether development proposals will be safe. We propose a number of draft policies relating to coastal change.

Coastal change management areas

- 1.446. We have worked with the University of Plymouth on a way to predict coastal erosion and flooding and have published a briefing [paper](#) and a topic [paper](#) on coastal change. The University of Plymouth have mapped areas that may be vulnerable to coastal change over the next 20, 50 and 100 years using the agreed methodology, which takes account of potential impacts from climate change through sea level rises. This work has been used to identify coastal change management areas (CCMAs) in accordance with the National Planning Policy Framework.
- 1.447. This is a highly complex topic, and it is recommended that the local plan is supported by supplementary planning guidance to give more details of how the CCMA approach would work in practice.

35. Policy – Coastal change management areas (CCMAs)

Within the Coastal Change Management Area (CCMA) defined on the Policies Map, proposals for new residential development, including the conversion of existing buildings, will not be permitted.

Applications for non-residential development within the CCMA will be assessed in relation to the most up-to-date evidence available for when coastal change can be expected so that:

- In parts of the CCMA expected to be at risk within a 0-to-20-year time horizon, only the following developments will be allowed: -
 - temporary development directly related to the coast, such as beach huts, cafes, car parks or sites used for touring caravan and camping;
 - temporary modifications to other existing commercial facilities where a positive link can be made to the local economy;
 - mitigation measures for dealing with coastal change that are in accordance with the relevant coastal strategy or
 - nationally significant infrastructure projects related to offshore development that are constructed to withstand the impacts of the expected coastal change.
- In parts of the CCMA expected to be at risk within a 20-to-50 year time horizon, in addition to the development allowed in the 0 to 20 years zone the replacement, relocation and adaptation of infrastructure, commercial and community uses will be permitted, providing they require a coastal location and provide economic and social benefits to the local community.
- In parts of the CCMA expected to be at risk within a 50 to 100 year time horizon, in addition to the development allowed in the 0 to 50 year zones, extensions to residential properties and householder applications may be acceptable.

All applications for development within a CCMA must show that it would not result in an increased risk to life or any property through the submission of a coastal change vulnerability assessment, which should be proportionate to the scale and nature of the development.

Planning permission for all development in a CCMA will be time limited according to the risk identified in the coastal erosion vulnerability assessment.

Justification for inclusion of policy

1.449. The NPPF (paragraph 170) requires plans to reduce the risk of coastal change by avoiding inappropriate development in vulnerable areas and to identify coastal change management areas, known as CCMAAs (paragraph 171). CCMAAs are not necessary in areas where the Shoreline Management Plan policy is to 'hold the line' and there is evidence that this can be maintained over the lifetime of the plan. Generally, the centres of our main coastal settlements are defended, and we have evidence to demonstrate that we can 'hold the line'. We have not therefore identified CCMAAs for any of our town centres. Paragraphs 172 and 173 of the NPPF set out the circumstances in which development will be appropriate in a coastal change management area. Our policy adds to national policy and we plan to provide greater detail through supplementary planning guidance.

Relocation of uses affected by coastal change

1.450. Where evidence shows that certain existing uses would be vulnerable to coastal change in the short term, we propose to maintain our current approach of allowing relocation in some circumstances to areas where development would otherwise be unacceptable.

36. Policy – Relocation of uses affected by coastal change

Where there is robust evidence to demonstrate that permanent homes (with unrestrictive occupancy) or community facilities, commercial or business uses that are considered important to coastal communities are likely to be affected by coastal erosion within 20 years of the date of the proposal, proposals for relocation/replacement may be considered favourably subject to the following criteria:

- i. The new development is located in an area at less risk of coastal erosion;
- ii. The replacement property is located close to the community from which it is displaced and has an acceptable relationship with it in terms of character, setting, local amenity and any special landscape designations;
- iii. Overall, taking both the existing and proposed buildings into account, the proposal should not have an additional detrimental impact on the landscape, townscape or biodiversity of the area, taking into account any special designations;
- iv. The existing site is either cleared and restored with enhancements for nature conservation or put to use to benefit the local community within three months of the first use of the replacement. The future use of the site should be secured in perpetuity and provision made for public access to the coast where appropriate;

- v. The development is consistent with the criteria set out in Policy 6 - Development Beyond Settlement Boundaries; and
- vi. In the case of a residential proposal, the gross volume of the replacement dwelling is no larger than the one it is to replace.

Justification for inclusion of policy

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

Development affecting coastal erosion

1.452. The broad national and local approach to coastal erosion (as set out in the Shoreline Management Plan) is to defend the centres of the main settlements and allow natural processes to continue in the more rural areas. Large parts of our coastline are designated as a World Heritage Site, the integrity of which would be undermined if natural processes were not allowed to continue.

37. Strategic Policy – Development affecting coastal erosion

Where compatible with the most up-to-date coastal policy (as expressed in the SMP or a strategy such as a beach management plan), the Council will promote proposals for sustainable coastal change management such as improvements to coastal defences or managed realignment, provided that they would not have an unacceptable adverse economic, social or environmental impact, including an unacceptable detrimental visual impact on a protected landscape.

To protect the integrity of the Dorset and East Devon World Heritage Site, the natural processes that created it will be allowed to continue, unless the safety and economic well-being of any coastal community would be undermined, provided that the implications of this for the World Heritage Site have been fully considered.

Where there is a conflict between allowing coastal erosion and protecting coastal communities from that erosion both interests will be recognised and wherever possible impacts will be mitigated where they arise. Schemes that are incompatible with coastal policy are unlikely to be supported.

- 1.453. This policy seeks to balance the need for protective measures to reduce rates of coastal change (where these are compatible with coastal strategy) with the integrity of the World Heritage Site, which relies on coastal change processes continuing. It is important to set out that both interests will need to be assessed as part of any planning proposal. This will help guide decision makers and determine mitigation measures that may be undertaken, such as slowing rather than stopping erosion or displaying materials to aid understanding of the outstanding universal value of the World Heritage Site (such as fossil displays in local museums). An example of where this policy would be relevant is in considering any application for rock groynes/islands as part of delivering a beach management plan at Sidmouth.

Links to marine planning

- 1.454. The NPPF (paragraph 170) requires local plans to take account of the UK Marine Policy Statement and marine plans. The adopted South Marine Plan is like the local plan in terms of enabling sustainable development, but it covers activities within the marine environment such as offshore wind farms, fishing, and submarine cables. The intertidal zone between the high and low water marks is where both land and marine planning systems overlap, but developments inland can also have the potential to have an impact on the marine environment. Links to the wider marine environment and the marine plan will need to be further explored, but no potential conflicts have been identified so far.

8. Meeting housing needs for all

- 1.455. People need homes not just for shelter, but for health and well-being. They need decent housing that they can afford to live in, where they can be warm, safe and secure, that provide stability and meet the household's needs now and as their needs change.
- 1.456. This is a strategic policy which addresses the Council's aspirations towards meeting the housing needs of East Devon. It is an overarching approach for the suite of policies in this chapter.

38. Strategic Policy - Housing to address needs

All proposals for housing, including those affecting the existing housing stock, will contribute to creating sustainable, inclusive and mixed communities in East Devon. This will be achieved by providing an appropriate mix of decent, good quality homes which meet identified needs for housing over the plan period, at locations consistent with the settlement hierarchy and the spatial strategy.

To achieve this the Council will:

- i. Seek to maximise the delivery of affordable housing across East Devon in order to meet identified needs of people who are not able to access the general housing market, and support a range of approaches to delivering affordable housing
- ii. Support proposals for the development of specialist accommodation that increase choice for older, vulnerable and disabled residents
- iii. Seek the use of good quality adaptable housing designs that provide flexible internal layouts and allow for cost-effective alterations to meet changing needs over a lifetime and reduce fuel poverty
- iv. Work with developers registered providers, landowners and relevant individuals or groups to address identified local demand for self and custom build homes as identified in the East Devon Self and Custom Build Register
- v. Support the retention and improvement of private rented accommodation, the provision of shared accommodation for single people, and proposals for the development of community-led housing schemes.

A proposal for housing development will be supported where it broadens choice and reflects and responds to the existing and future needs of the district's households as identified in the Local Housing Needs Assessment or successor documents, and in up-to-date local housing need evidence.

A proposal for housing development will provide a mix of house types, tenures and sizes appropriate to the area. This will be subject to detailed policies in this plan and other Development Plan Documents, as well as evidence of the ability of the site to

accommodate a mix of housing, and relevant, up to date evidence of market conditions. Housing mix will be achieved by:

- i. A mix of affordable housing through social rent, affordable rent, and affordable home ownership (First Homes and other products) to meet affordable housing needs over the plan period, particularly the needs of younger people and key workers.
- ii. A range of housing suitable for households with specialist needs, including
 - Dwellings for older people who want to retain independent living;
 - Adaptable and accessible housing and wheelchair user housing
 - Use Class C2 accommodation including care homes
 - Market housing for rent as well as for home ownership
 - Serviced plots of land for self-build and custom housebuilding
 - Gypsy and Travellers and Travelling Showpeople accommodation

Justification for inclusion of policy

1.457. Planning for a sufficient amount of housing growth in East Devon is essential but it is vital that the housing development addresses the needs of the area. The plan therefore includes a strategic policy about achieving housing mix and high quality homes focused on meeting housing needs to support communities.

1.458. The policy is strategic because it is a commitment to addressing housing needs. This is a strategic priority of the area, as recognised in the Council Plan. This policy supports Council priority one 'Better Homes and Communities for All', notably:

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

1.459. Equally important, this policy also aligns with the national policy in the NPPF which stresses that the local plan should provide a framework for addressing housing needs. The policy encompasses housing matters which national policy requires the local plan policies to address. It provides the overarching context for the other housing policies and helps to avoid repetition and duplication in those policies.

- 1.460. Definitions of key terms and concepts used in the evidence and in this policy and the other housing policies are to be set out in either the Plan's glossary or in the plan's Reasoned Justification, not in the wording of the policy. This Strategic Policy depends on the definitions of housing need types. Some of these definitions are set out in NPPF, notably the definition of affordable housing.
- 1.461. This strategic policy is complemented by the strategic housing policy 3 about the amount of housing to be delivered in the plan period. Together these policies will align with and support the plan's spatial strategy and the economic strategy, as well as strategic policies on climate change, energy efficiency, design and accessibility. In combination, the two policies provide a clear starting point for the suite of non-strategic housing policies.
- 1.462. Housing needs are diverse and change over time. The non-strategic housing policies are necessarily wide ranging. These policies are preferred because they address local issues relevant to East Devon and they fully reflect national planning policies, mindful of the test of soundness for consistency with national planning policies. They take account of the NPPF and the 24 May 2021 Written Ministerial Statement. Plan policies are also informed by national policy on housing, which is complex, particularly the approaches to widening housing choice across housing tenures. The policies address the Council's aspirations set out in the Council Plan, and the Council's Housing Strategy.
- 1.463. The suite of proposed non-strategic housing policies support the proposed Strategic Policies on housing which address needs and delivery of the levels of future housing development. Those housing policies work in combination within the spatial strategy, focused on:
- a) Delivering housing provision through a range of dwelling sizes, types and tenures
 - b) Delivering more affordable homes; and
 - c) Achieving mixed and balanced places, which have access to services and amenities.
- 1.464. Their purpose is to guide development management decisions on development proposals related to housing uses. The 9 policies cover development, of Residential Dwellings (*Use Class C3*), Residential Institutions (*Use Class C2*), other housing such as Houses In Multiple Occupation (HMO) (*Sui Generis use*), and stationing of caravans for residential purposes for Gypsies and Travellers, and Travelling Showpeople (*Sui Generis use*).

Evidence

- 1.465. The key evidence about housing need is provided by the Local Housing Needs Assessment 2022. This provides evidence about Local Housing Need, Affordable Housing Need, and the needs of particular groups of people. The use of evidence to justify the policy is explained in the text accompanying each policy.

Audit trail and use of evidence to justify housing policies

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

Affordable housing

- 1.467. Affordability and lack of sufficient affordable housing is a major issue in East Devon. Some people describe it as a housing crisis. We have a combination of high house prices, high private rents and a low proportion of social and affordable rent properties. With an affordability ratio of 10.9, this is one of the highest in Devon, well above the national average and the south west average.
- 1.468. Additional affordable housing is needed particularly from newly forming, young households. National planning and housing policy, and the Council Plan are seeking to increase the delivery of affordable housing. The amount of affordable housing changes through losses from Right to Buy and demolitions, but also through stock additions and tenure changes.

39. Policy - Affordable Housing

To foster balanced and mixed communities, planning obligations will be sought on all developments which propose affordable housing or which satisfy the criteria for qualifying cases for providing a mix of market and affordable housing. The following will apply:

- a) The number, size, type and tenure of affordable housing will meet local need in accordance with Table 1, the Council's most up to date evidence of need and supply, the provisions of this policy, and the provisions of other Development Plan Documents where the latter have not been superseded by the Local Plan.

TABLE 1		
Location	Affordable housing as a percentage of the site total	Tenure mix of the affordable housing requirement
Second new town	At least 15%	50% Social Rent 10% Affordable Rent 30% First Homes at 30% discount 10% other affordable homeownership products
Rest of East Devon (excluding Cranbrook DPD area and existing commitments/completions)	At least 35%	64% Social Rent 0% Affordable Rent 36% First Homes at 30% discount 0% other affordable homeownership products

- b) Where development proposes seek to replace existing affordable housing, the number and mix of tenures and affordable housing types will make efficient use of the land consistent with policies 59 and 60, and appropriate to the specific circumstances of the site. Where relevant, the mix will facilitate the right of return for existing social rent tenants from Council housing into new social rent accommodation. Otherwise, replacement of rented affordable housing will be provided as affordable rent. Market housing may be included for viability reasons to enable affordable housing delivery provided there is little or no net loss of affordable housing on site, or as part of a larger scheme.
- c) Affordable housing will remain affordable in perpetuity. Legal agreements may make provision for achieving clawback on long term, phased schemes if affordable housing is converted to another tenure.
- d) Where the requirements and exceptional circumstances set out in this policy are not proposed to be met, then the applicant will submit development viability evidence to justify the departure. Where a lower level of provision is initially agreed, developers will be required to enter into an agreement that allows affordable housing contributions to be increased in the future should higher levels become achievable (e.g. through an 'overage' clause). The Council will also reappraise viability on subsequent phases of large schemes.

- e) On all developments for new market housing, including conversions, mixed use schemes, and housing development that forms part of a wider development, but excluding Build to Rent and other exemptions set out in this policy, the Council will require the provision of affordable housing in accordance with the following:
- i. Affordable housing will be required on residential development schemes of 10 or more dwellings (gross), including specialist housing for older people where the site is delivering a net gain of 10 or more self-contained units (C3 and C2), and will provide a mix of tenures*:
 - ii. In cases where the 35% calculation provides a fraction of an affordable dwelling, such provision will be collected through a financial contribution of broadly equivalent value to that which would have been required on-site.
 - iii. Housing provision on major sites (10 or more dwellings) will be made for at least 10% of affordable housing to be affordable home ownership products**, except for the following housing development types which are exempt:
 - Solely for Build to Rent homes;
 - Specialist accommodation for people with specific needs such as purpose-built accommodation for older persons***
 - Self-build or custom build housing***; or
 - Solely for affordable housing.
 - iv. Where affordable housing is required, it will be provided on site and dispersed in small clusters across the site, indistinguishable in terms of design and materials from any market housing
 - v. In exceptional circumstances, the Council may accept a financial contribution by way of a commuted sum to an equivalent value in lieu of on-site delivery provision for use towards offsite affordable housing provision. For example, where no registered provider is willing to manage the affordable units.
 - vi. Exceptionally, the Council may consider land gifted to the Council in lieu of affordable housing provision or financial contribution, subject to site threshold, equivalence provision, location, and infrastructure availability.
 - vii. Developments of 5 to 9 dwellings (gross) located within a parish defined as a designated rural area^{[1](#)} will be required to make a financial contribution based on the affordable housing requirement and tenure split of affordable housing requirement as set out in Table 1 in this Policy.
 - viii. Where it can be demonstrated that the requirements above are not viable, due to specific site conditions or other material considerations affecting development of the site, an alternative dwelling or tenure mix that meets local need or a lower level of provision may be acceptable. Preference will be to reduce the proportion of affordable rent home first, then social rent housing, and finally affordable home ownership.

- ix. As part of residential development proposals, where vacant buildings are brought back into any lawful use, or are demolished to be replaced by new buildings, the affordable housing requirement for the proposal will be discounted by a proportion equivalent to the existing gross floorspace of the vacant buildings unless the requirement to do so is removed or moderated by a change in national policy or guidance.
- x. Unless proposed development falls within one of the exceptions or exemptions in this policy, planning permission will be refused where a site is under the relevant dwelling number thresholds in Clauses 2a), 2c) and 2g) and does not achieve optimum capacity, or where a larger site has been sub-divided into smaller parcels and so avoids developer contributions for affordable housing.
- xi. Provide a mix of property sizes and types across the site, demonstrating how the site responds to robust, up to date evidence about housing need, including the following mix of property sizes for affordable housing shown in the East Devon Local Housing Need Assessment 2022:

:

Property size	Percentage of affordable housing provided
1 bedroom	12%
2 bedrooms	37%
3 bedrooms	40%
4+ bedrooms	11%

(Source Table 52 LHNA 2022)

- f. For all affordable homes that are delivered as First Homes the following will apply
 - i. A discount of 30% against the market value
 - ii. The price cap, based on open market values and after the discount is applied, and household income caps will be in accordance with national planning policy current at the 'Authority to Proceed' stage of the First Homes application process.
 - iii. 'Local connection' eligibility criteria and priority for key workers are as set out in the East Devon First Homes Interim Guidance Note 2022 and subsequently in an SPD). Unless superseded by new national planning policy or guidance, after 3 months of marketing if there is no reservation of or offer accepted on a First Home, then the local eligibility criteria fall away, and the First Home reverts to national criteria.
 - iv. The legal agreement will include provisions regarding the sale of First Homes without First Homes restrictions where the circumstances prescribed in Government policy and guidance are met.
- g. On Build to Rent schemes, 20% will be affordable private rent homes provided on site at a 20% discount, subject to viability. All homes on the scheme will be managed collectively by a single build to rent landlord.

- h. The following types of developments are exempt from this policy:
- i. Rural Exception Sites and First Homes Exception Sites (see Policy 48);
 - ii. Residential institutions, student accommodation, gypsy and traveller accommodation, live work units where the main use is predominantly employment, and non-residential development.

The Local Planning Authority will prepare a Supplementary Planning Document to set out details about how this Policy will be implemented.

NOTES :

[\[1\]](#) Designated rural areas are described under section 157(1) of the Housing Act 1985, which includes Areas of Outstanding Natural Beauty.

* Table 1) will be refined when viability evidence and affordable housing supply forecasts are available. This may vary the affordable housing requirement and/or tenure split. These may also vary by location.

** The percentage in this clause will be refined when viability evidence and affordable housing supply forecasts are available to assess the policy's effectiveness (i.e. deliverability). It may also be refined when this evidence is also used to assess whether the application of the 10% requirement would or would not prejudice the ability to meet the identified affordable housing needs of specific groups.

*** Where specialist housing or self-build or custom build is part of the proposed mix of housing on a development scheme then the policy will apply to the residue that is not exempted provided that the residue is 10 or more dwellings (gross).

- 1.469. This policy focuses on affordable housing delivered through development. It supports the Strategic Policies on addressing housing need and affordable housing provision aligned with the local plan's vision, objectives and strategies. The policy is needed to help deliver at least 4,070 additional affordable dwellings in the plan period. This policy is complemented by Policy 48 on the types of 'exception housing' sites in the countryside which are aimed at extending the opportunity to deliver affordable housing in rural areas.
- 1.470. For the avoidance of doubt, this policy does not supersede Policy CB10 Cranbrook Affordable Housing in the Cranbrook Plan DPD.
- 1.471. Some affordable housing will be delivered by Registered Providers. Currently these are primarily by Housing Associations. The District Council is exploring ways of increasing social and affordable housing. However, contributions from market housing development negotiated through S106 agreements are likely to remain the principal mechanism for delivering additional affordable housing for the foreseeable future.
- 1.472. NPPF defines types of affordable housing. The May 2021 Written Ministerial Statement (WMS) added First Homes as a new type. The preferred policies rely on those definitions.

- 1.473. The complicated plethora of affordable housing products and routes by which households can move from affordable to market housing, has widened and been updated by recent national policy. As well as Social Rent, Affordable Rent, Shared Ownership, Discounted Market Housing, Rural Exceptions, the local plan considers Rent to Buy, Build to Rent, and First Homes Exceptions Homes.
- 1.474. Justifying the local components in this policy relies on local evidence. The chief evidence about affordable housing need is in the East Devon Local Housing Needs Assessment September 2022 (ORS). It assesses the scale and type of affordable housing need in the district over the plan period. In addition, the Council has evidence about the supply of affordable housing from completions, commitments and potential allocations. More information about how the Council has used this evidence to justify this Affordable Housing policy as well as the strategic policy on Affordable Housing Requirement is set out the 2022 Housing Need, Supply and Requirement Interim Topic Paper.
- 1.475. All the issues listed in the policy are raised in the NPPF, the Written Ministerial Statement on First Homes (May 2021) and related PPG. The broad approaches to affordable housing in the policy reflect national policy. This policy provides local policy components relating to the following:
- The site size thresholds for determining where affordable housing is required – other than exemptions, all housing development over the threshold will need to contribute.
 - Percentages of affordable housing sought from a development site, by size and type. The 2022 Housing Need, Supply and Requirement Interim Topic Paper justifies these percentages of affordable housing mix. The percentages are informed by LHNA sensitivity test 3, moderated by supply forecast evidence. Not all housing development sites would deliver affordable housing due to exemptions, so these percentages relate to sites where policy would require affordable housing provision, not to the total district housing requirement. They are the starting point for negotiations for affordable housing to be delivered through planning obligations.
 - The policy makes clear the exceptional circumstances where proposals departing from policy may be considered, and the requirement for viability evidence to justify a departure.
 - The 30% discount on First Homes (which the LHNA sensitivity test 3 encompasses), this is the lowest of the discount rates which national planning policy allows that plan to use.
 - The policy aim for 25% of all affordable housing delivered through planning obligations to be First Homes, in line with Government policy
 - The policy aim for 10% of all dwellings being delivered on a site to be affordable home ownership, in line with Government policy
 - Reliance on national policy regarding Build to rent
 - Local connection eligibility criteria (currently in the Interim Guidance Note)

- The Council's commitment to producing an SPD to guide policy implementation.

1.476. The Council will review the policy when further evidence relating to housing supply delivery and trajectories becomes available.

DRAFT

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

The Council will support development that widens choice by securing a more diverse supply of housing where this meets the identified needs of older people in East Devon, and supports healthy, safe and independent lives.

At least 1,630 net additional specialist dwellings in East Devon to meet older person needs is expected to be delivered in the form of adapted housing delivered through Policy 41 but the Council aspires to achieve more than this amount in the plan period where consistent with plan objectives and the spatial strategy. The Council will monitor the delivery of specialist housing for older people.

The Council will determine planning applications for different types of specialist housing for older people, on the basis that:

- i. Market accommodation for older people in the form of age restricted general market housing, retirement living or sheltered housing and extra care housing or housing with care is in Use Class C3 (dwellings).
- ii. Residential care home and nursing home accommodation (including end of life / hospice care and dementia care home accommodation) are in Use Class C2. Local Plan housing policies 39 and 48 will not apply to them,

The Use Class of other specialist housing products will be determined taking into consideration the level of care and scale of communal facilities. Consequently, the following will apply when determining planning applications:

- i. Suitable locations for specialist older person accommodation will be at settlements in tiers 1 to 4 of the settlement hierarchy where the site is within 400m walking distance of local shops and easily accessible by walking or by public transport to town centres and to health, care and community facilities.
- ii. The Council will support development proposing specialist older person housing at suitable locations in East Devon where this widens choice.

Where there is up to date evidence of specialist accommodation need in East Devon and subject to viability, development will be required to deliver one or more of the specialist types of accommodation for older people as follows:

- i. On local plan site allocations development proposals for 20 to 199 dwellings will include at least 20% of those dwellings on-site as specialist older person dwellings (use class C3)
- ii. On local plan site allocations, development proposals for 200 or more dwellings will include at least 20% of those dwellings on-site as specialist older person dwellings as C3 dwellings or C2 equivalents

Exceptionally, a lower percentage of specialist accommodation for older people may be considered where there is evidence of abnormal costs or site conditions not anticipated by the plan or the Overall Plan Viability evidence.

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

For Use Class C2 accommodation, the count of the number of bed spaces will be converted to dwelling equivalents based on the formula used by national statistics from the latest Housing Flow Reconciliation Return. Dwelling equivalents will be monitored and counted for housing supply purposes.

Specialist older person housing will provide adequate communal facilities, including accommodation for essential staff, on site.

Proposals for specialist older person housing will demonstrate how design and layout addresses the health and well-being needs of older people including those with dementia and other long-term conditions, consistent with Policies 61 and 62.

Where a site provides a mix of Use Classes C2 and C3, Policy 40 will apply to the C3 element of the development. Applications will need to include Care Needs Assessment evidence to justify the development proposal's scale, tenure and accommodation type.

Planning permission will be refused in the following circumstances:

- i. On a Local Plan allocation that is expected to achieve 200 or more dwellings which does not meet the exceptional circumstances set out in Clause 8 of this Policy, where the development proposal avoids provision of specialist older person housing because:
 - The development proposed is under the 200-dwelling threshold and does not achieve optimum capacity, or
 - A larger site has been sub-divided into smaller parcels that then are below the threshold. Or
- ii. Where the proposed development of a large retirement scheme would exceed up to date identified need or would significantly undermine the creation of sustainable, mixed communities; Or
- iii. Where development proposed would result in the loss of specialist housing for older people, unless evidence demonstrates that:
 - There is no longer a need in East Devon for that type of housing; and
 - The housing cannot be converted to meet other types of older person need, or that conversion, remodelling, or redevelopment to specialist housing to meet other social care and health needs is not viable.

The Local Planning Authority will prepare a Supplementary Planning Document to set out details about how this Policy will be implemented.

Justification for inclusion of policy

- 1.477. Planning for the housing needs of older people is important because East Devon has an ageing population that is growing. Based on the dwelling-led Local Housing Need projection, the LHNA 2022 concludes that the number of

over 75s in East Devon is projected to increase by around 13,300 in the period 2020-40; of which approximately 5,300 will be over 85 years old.

- 1.478. In addition to the national and local trend of an ageing population, people are attracted to East Devon by its environmental qualities, including those looking to retire here. This increases demand for housing and impacts on local house prices and affordability.
- 1.479. NPPF specifically identifies older people as one of the groups in the community whose assessed needs should be reflected in planning policy. NPPF defines older people. All the issues listed in the preferred policy are raised in NPPF and related PPG. The broad approaches to housing for older people in the policy reflect national policy.
- 1.480. Having a local plan policy focused on providing the right type of housing in the right place to meet the needs of older people is essential. This policy is one of a suite of policies to address the need for more and better quality homes and communities for all. It focuses on widening choice, reflecting the Council Plan and complementing the Council's Housing Strategy. Offering older people a better choice of accommodation to suit their changing needs helps them live independently for longer in their communities.
- 1.481. The needs of older people are diverse. Their health, lifestyles, income and wealth differs greatly, as will their housing needs. Those needs change over time. Many older people may not want or need specialist housing but prefer to stay or move to general housing that is already suitable, including homes that can be adapted.
- 1.482. The policy recognises that a wide range of dwelling types is needed. Much will be general need housing, be it flats, bungalows, smaller or larger homes, which are accessible and adaptable, where care can be provided in the home. But there will be a need for specialist housing for older people, with high levels of care and support. PPG identifies the broad categories of specialist housing. The policy uses these broad categories to make clear which types will be subject to affordable housing policies, and which will be exempt.
- 1.483. This policy focuses on types of housing delivered through development that can meet the needs of older people. It supports the Strategic Policies on addressing housing need and mixed communities aligned with the local plan's vision, objectives and strategies. It operates in concert with the policy on accessible and adaptable housing. The policy on subdivision of existing dwellings and building creating flats therefore works in tandem with this policy, to support the development of housing for older people and changes to the existing dwelling stock.
- 1.484. Adapted housing is expected to be a significant source of housing to meet the housing needs of older people, Adapted housing delivered through Policy 40 will augment supply general housing in the housing stock that is already suitable for

older person needs or homes which can be adapted to meet changing needs. The LHNA 2022 shows that the vast majority of the overall net increase of 13,300 in households to 2040, is in households headed by somebody over the age of 65. Many are already established and living in existing homes but their needs will change over time.

- 1.485. The LHNA 2022 modelled demand for specialist older person housing in the district in the plan period is 6,224 dwellings. This is an idealised outcome. The LHNA 2022 states that in practice the level of delivery identified as being required is likely to be unachievable given that it is about a third of the overall local housing need. If current rates of provision were to continue, then a further 1,630 specialist older person dwellings would be required, equating to about 9% of the Local Housing Need. The study breaks down the forecast into types of specialist housing.
- 1.486. Market and affordable dwellings will meet part of the need. Other specialist housing will be needed such as residential care homes and extra care homes (Use class C2 – Residential institution). In line with PPG, the LPA counts housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. This takes into account the Government's formula used for the Housing Flow Reconciliation Return statistics to convert C2 bed spaces (gains and losses) to C3 dwelling equivalents.
- 1.487. The LHNA 2022 does not recommend the number of additional bed spaces needed in C2 care homes to meet the needs of elderly people. But it forecasts the overall demand for extra care housing to be 2,473 units to 2040. Nearly all would be C2 accommodation because of the level of care and access to communal facilities required. The need for sheltered accommodation is forecast to be 3,751 dwellings. However, the amount of sheltered housing and extra care units provided if current rates are maintained would be 1,590 and 40 respectively. There is considerable uncertainty at this time about how much of the modelled demand would arise, as demand depends on the ability of occupiers to afford the specialist housing products and the alternatives available such as assistive technology that helps to support people at home for longer.
- 1.488. Given the scale of need for older persons housing across the District as evidenced by the LHNA 2022, there is no policy requirement for planning applications to demonstrate this need. Planning applications should demonstrate how the proposed development widens choice to meet the range of needs for older persons housing.
- 1.489. The policy identifies where the types of locations where specialist housing is being directed. These are places in the settlement hierarchy where there are services and facilities.
- 1.490. The policy provides site size thresholds, mindful that larger sites will be at the towns in tiers 1 and 2, the proposed urban extension north of Topsham, and the

proposed second new town. The 200-dwelling threshold reflects the likely minimum size of a new C2 care home, is likely to reflect current business models, and may only be achievable on larger sites.

- 1.491. The plan's policies relating to high quality and inclusive design will support the delivery of this policy.
- 1.492. The Council will keep this policy under review through the plan making process, as further evidence becomes available, including the evidence about the overall viability of the plan.

41. Policy - Accessible and Adaptable Housing

To ensure that new homes provide quality living environments for residents both now and in the future, the following standards from Building Regulations Approved Document M: Volume 1 (Access to and use of dwellings) (or replacement standards) will apply to new dwellings, subject to consideration of site suitability and site viability:

- i. 100% of all new dwellings will meet building regulation M4 (2) requirements (accessible and adaptable dwellings).
- ii. 100% of all new specialist accommodation for older people will meet regulation M4 (3) requirements (a) or (b) (wheelchair user dwellings).
- iii. 100% of new specialist accommodation for older people will meet regulation M4 (3) (2) (b) requirements (wheelchair accessible dwellings) for those dwellings where the local authority is responsible for allocating or nominating a person to live in a dwelling.
- iv. At least 15% of all new affordable housing for rent will meet building regulation M4 (3) (2) (a) requirements (wheelchair adaptable).
- v. At least 10% of all new affordable housing for homeownership will meet regulation M4 (3) (2) requirements (a) or (b) (wheelchair user dwellings).
- vi. At least 10% of all new market housing dwellings will meet regulation M4 (3) (2) requirements (a) or (b) (wheelchair user dwellings).

When providing for wheelchair user housing, early discussion with the Council is required to obtain the most up to date information on specific need for this type of housing in the local area.

The Local Planning Authority will prepare a Supplementary Planning Document to set out details about how this Policy will be implemented.

Justification for inclusion of policy

- 1.493. The Government's approach to health and adult social care is underpinned by the principle of sustaining people at home for as long as possible. This is reflected in building regulations relating to adaptations and wheelchair accessible homes, with 3 categories of dwellings:
- I. M4(1) Category 1: Visitable dwellings – mandatory, broadly about accessibility to all properties
 - II. M4(2) Category 2: Accessible and adaptable dwellings – optional, similar to lifetime homes, and
 - III. M4(3) Category 3: Wheelchair user dwellings – optional, equivalent to wheelchair accessible standard
- 1.494. The East Devon Local Housing Need Assessment 2022 provides the evidence in relation to need for nationally described standards for accessible and adaptable homes (Part M4(2)) and wheelchair users (Part M4(3)). It demonstrates that need is largely driven by a growing population of older persons, as the PPG recognises.
- 1.495. The Council considers that this evidence is robust and can be relied upon to justify this policy. It demonstrates that an additional 12,959 households will either need adaptations to their existing housing or suitable new housing to be provided by 2040.
- 1.496. **M4(2) Category 2:** The study estimates 76% of households would live in dwellings that can be converted to meet the M4(1) Category standard. The study concludes that at least 30% of the need for adapted housing could not be met by adaptation of existing homes, a total of 5,119 households. They would need M4(2) Category 2. However, there is a significant overlap with the 6,400 older persons dwellings need identified by the study. Nevertheless, the requirement for adapted housing would still be high.
- 1.497. **M4(3) Category 3 wheelchair users housing** Based on gross modelled need, the ORS study forecasts a net additional 1,010 households over the plan period in East Devon will need wheelchair adapted housing. This equates to about 6% of the local housing need. The 5,119 net adapted need housing already encompasses households counted as having a health problems or disability that affects their housing need. That figure already includes households with wheelchair users so the latter should not be double counted. There's also a very significant overlap between wheelchair users housing need and the forecast additional 6,224 specialist older persons housing need. The study concludes that it may be appropriate to adopt a target of 100% wheelchair accessible housing. This could reduce the proportion of general needs housing that would need to meet the M4(3) Category 3 requirements.
- 1.498. The LHNA 2022 concludes that is reasonable that the Council may consider:

- a) a target, for example 15% of all new affordable housing for rent, subject to viability) being wheelchair adapted, to ensure that a situation does not arise in which a property is not available for a wheelchair user in affordable need
- b) A target, for example 10% of all new market housing, being fully wheelchair adaptable homes, subject to viability and similar constraints, to avoid there being insufficient market homes that are fully wheelchair adaptable to meet the needs of the wheelchair using population.

- 1.499. The policy addresses the identified needs in the plan period. All the issues listed in the policy are raised in the NPPF and related PPG, in the context of Building Regulations Approved Document M: Volume 1 (Access to and use of dwellings). The broad approaches to housing for accessible and adaptable housing in the policy reflect national policy.
- 1.500. The Policy sets out the Council's approach towards the optional standards regarding access to and use of buildings under Regulations M4(2) and M4(3). This approach is consistent with NPPF, and PPG on Housing for Older and Disabled People, including the guidance that where an identified need exists, plans are expected to make use of the optional technical housing standards (footnote 46 of the NPPF) to help bring forward an adequate supply of accessible housing. The percentage of dwellings for the categories, and the circumstances where they are required by policy are guided by the evidence in the LHNA 2022 and the Local Plan spatial strategy.
- 1.501. The Council is mindful that its ability to require wheelchair accessible housing is constrained to those dwellings where the Council is responsible for allocating or nominating a person to live in those dwellings. These are affordable dwellings for social rent or affordable rent which are and secured through the preparation of the S106 legal agreement which is an integral part of the development management process. The legal agreement must be completed before planning permission is granted. The planning application should be accompanied by an Affordable Housing Statement indicating the number and types of affordable housing and the relevant dwelling units. It should be noted that the Council does not 'allocate' affordable home ownership housing products so cannot require First Homes, Shared Ownership, or Discounted Market Housing to be wheelchair accessible. This does not preclude affordable home ownership products or market housing from being wheelchair accessible.
- 1.502. Where there is evidence that site conditions or viability preclude the provision of specialist housing required by policy, then building regulations require that housing is provided to at least M4(1) standard.

42. Policy - Market housing mix

To provide choice and meet needs, through achieving a mix of housing types and sizes across East Devon, residential proposals for use Class C3 dwellings will:

- i. Be at locations consistent with the spatial strategy and settlement hierarchy.
- ii. The type of market housing for sale or rent will address housing needs in the area, and take account of the location and context of surrounding development
- iii. Provide a mix of property sizes across the site, demonstrating how the site responds to robust, up to date evidence about housing need, including the following mix of property sizes for market housing shown in the East Devon Local Housing Need Assessment 2022:

Property size	Percentage of market housing provided
1 bedroom	5%
2 bedrooms	19%
3 bedrooms	53%
4+ bedrooms	22%

(Source Table 52 LHNA 2022)

- iv. Where the development is not consistent with evidenced needs, the proposal will need to demonstrate why the departure is justified, for example
 - Physical constraints reducing the number of dwellings;
 - Cost and design of conversions
 - Locations such as town centres where low density development with larger, higher value dwellings may not be appropriate
 - Severe site constraints and abnormal costs impacting on viability
 - Particular housing types and forms needed to sustain or enhance a heritage asset or its setting
 - Local up to date evidence of housing need in the parish or parish group

Exceptionally, if a proposal is not meeting policy requirements, applicants will need to provide robust market conditions evidence demonstrating lack of marketability

The Local Planning Authority will prepare a Supplementary Planning Document to set out details about how this Policy will be implemented.

Justification for inclusion of policy

- 1.503. This policy complements the policy on affordable housing mix. It helps ensure that the overall policy approach to mix and balance of housing types and sizes across the District can be addressed. It enables a wide choice of homes to address the needs for all types of housing of the plan period, meeting the needs of the whole community. It also contributes towards creating more interesting and diverse environments. The policy takes account of the current housing stock and projected demographic changes which impact on the need to address issues relating to market housing need and supply with regard to:
- Housing types (e.g. houses; flats)
 - Dwelling size (number of bedrooms)
 - Sectors within the private sector market e.g. private rented, ownership
- 1.504. Government policy is for local plans to boost housing supply. Delivery of 4,070 affordable housing requirement to 2040 in East Devon means that the remaining 14,850 dwellings requirement would therefore be met by market housing for sale and rent in the plan period. This is about 75% of the total policy requirement.
- 1.505. The LHNA 2022 provides evidence about the need for a range of housing types and tenures in the area. The Council concludes that this provides robust evidence to inform this policy, as well as strategic policy 3. However, the Council acknowledges that when development proposals are submitted they will need to be informed by the latest evidence about housing need.
- 1.506. A range of market housing types, tenures and sizes are needed across East Devon, to provide choice for the wide range of needs in this area. The housing markets within this District are traditionally buoyant. Recent housing development has been greatest at Cranbrook and the West End of the district.
- 1.507. Owner occupied housing is the largest tenure type in East Devon, accounting for 76 per cent of dwellings in 2011. This is slightly down on the 78 per cent in 2001. Home ownership remains a keystone policy of Government. The 2019 Government manifesto pledge is to “continue to increase the number of homes being built”. The manifesto also referred to a need to rebalance the housing market towards more home ownership: There are a plethora of Government initiatives and housing products aimed at extending home ownership, enabling households who aspire to home ownership to get on to the property ladder.
- 1.508. Government does recognise that the private rented sector is an important and growing part of the housing market in England. Much of the focus is on improving management and maintenance. Private rented housing in 2011 rose to 15% of total stock in East Devon. Private rent levels are high compared to the rest of Devon with average monthly private sector rents almost £700. This policy recognises the role of the private rented sector in making housing available for those who cannot afford or do not want home ownership, but who can afford

market rents. Separate local plan policies on design and on conversion of existing dwellings and buildings, and delivery of high quality housing are relevant to private rented housing and market housing.

1.509. The policy addresses how to secure a mix of market housing to meet need in the plan period. All the issues listed in the preferred policy are raised in the NPPF and related PPG. The broad approaches to market housing mix in the policy reflect national planning and housing policy. The policy does not include a size threshold, as all market dwellings should be responding to need. The policy therefore considers:

- The percentage mix of dwelling sizes and
- types of market housing for sale and rent
- Locations – consistent with the settlement strategy
- Evidence required to demonstrate why proposals cannot meet policy requirements.

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

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

- What appetite is there from Registered Providers to develop or manage Build to Rent housing (or are they prioritising Affordable Rent)?
- What appetite is there from developers and investors for Build to Rent schemes, including demand appraisal and viability? And can it accelerate housing delivery?
- What kind of products would be delivered? Is the focus on high end projects?

- What is the minimum size of development for the schemes to be viable (50+ units?)
- What is the target market, particularly the age and income group(s)?
- What locations, design/layout and facilities would renters find desirable?

1.512. The LHNA 2022 refers to research by JLL which shows that the average Build to rent option is 9.3% more expensive than median rents. Even with discount the local housing allowance is insufficient to cover costs for affordable rent units, and would seem unlikely to bring forward affordable housing options.

1.513. There is little or no evidence at this time that there is demand for Build to Rent products in East Devon. If there is evidence of need then PPG requires the local plan to include policy setting out the approach to promoting and accommodating build to rent.

1.514. The Council will keep this policy under review through the plan making process, as additional evidence becomes available, for example the overall plan viability evidence and forecasts about delivery of market housing.

43. Policy – Self-Build and Custom Build Housing

As part of meeting housing needs, securing greater housing diversity and encouraging high quality design, proposals for custom and self-build housing, to be occupied by those persons commissioning or undertaking the construction, will be supported through the following measures:

- i. 5% of dwellings on sites of 20 homes or more, including all local plan housing and mixed-use allocations, must be delivered as serviced custom and self-build plots¹⁰. The agreed plots should:
 - Be actively marketed to individuals and custom build companies (as appropriate) in accordance with a marketing and pricing strategy that shall be agreed in writing with the Local Planning Authority in advance of a plot/s being first marketed. All plots shall be marketed at a reasonable price to reflect market conditions for at least 24 months from being fully serviced and developable. Any plots that have not been sold after 2 years of being continuously marketed in accordance with this policy shall be made available for development on the open market;

¹⁰ A serviced plot is a parcel of land with legal access to a public highway, and at least water, foul drainage and electricity supply available at the plot boundary

43. Policy – Self-Build and Custom Build Housing

- Have suitable road access delivered at an early stage in the development;
 - Be made available for sale before 50% of the dwellings on the site have been commenced;
 - Be of a size that reflects local demand and, where more than one plot is provided, a variety of sizes should be offered to reflect the range of local demand;
 - Be offered for sale with no legal or physical restrictions that would prevent immediate purchase and development;
 - On sites of over 250 dwellings, a proportion of plots must be made available for affordable housing, to be secured through legal agreement, subject to viability;
 - On sites of over 100 dwellings, design codes should be used flexibly to encourage high quality housing design;
 - On sites of over 100 dwellings, the agreed design code should be used to provide 'plot passports' that provide a simple, succinct summary of each plot as a reference point for the purchaser.
 - Be completed within 3 years of the self or custom builder purchasing the serviced and developable plot.
- ii. Encouraging communities preparing Neighbourhood Plans to consider identifying sites for custom and self-builders

Justification for inclusion of policy

- 1.515. **Promoting self-build housing** - We want to increase opportunities for people to build their own homes in East Devon. This will enable greater diversity of housing supply and could lead to improvements in affordability, quality of design and choice.
- 1.516. Custom and self-build is part of the overall housing supply picture. This is additional to the mainstream supply housing delivered by large house builders and registered providers. Not only is it a route into home ownership, including affordable homeownership, but it also enables housing to be tailored to meet individual needs and specifications. It can benefit individuals and communities. For example, self-build can lead to savings relative to buying a 'ready-made' product because there is no developer profit (often at least 20% of the cost of a new home). It also has the potential to boost and accelerate the supply of housing and can diversify the land supply, widening choice.
- 1.517. Communities benefit from homes with a better design, build quality and environmental footprint and a more diverse and resilient housing supply. By using modern methods of construction and building to high specifications, self-builders often improve the sustainability of the housing stock. Self-build can

also be good for local businesses and provide additional employment opportunities. It can form an attractive market to small and medium house builders because there is less risk, since contracts are settled earlier in the development process. This enables construction to be financed through the customer's mortgage stage payments, which reduces business finance and improves profitability. Supporting smaller builders can help local economies by using more local supply chains than volume house builders and creating opportunities for local tradespeople.

- 1.518. Under the Self Build and Custom Housebuilding Act 2015, the Council is required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. There are also duties to have regard to this and to give enough suitable development permissions to meet the identified demand. The 2015 Act (as amended) contains a legal definition of Self-Build and Custom Build housing.

Need

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

Supply

- 1.522. To date all self-build plots have been provided through 'windfall' opportunities. Some of the initial owners are self-house builders where the individual directly organises the design and construction of their new home. Other delivery models could include independent community collaboration where a group of people acquire a site and split it into plots for self-build homes, sharing labour and expertise. Supported community self-build is another delivery model where a social landlord or supportive body helps people build a group of homes together. The policy can apply to self-build and custom build development by different organisations such as Community Led Housing Groups, Community Land Trusts, Co-operatives and Cohousing groups.

- 1.523. Evidence in the annual self-build monitoring report indicates that the Council has so far met its legal requirements to provide plots to meet the demand shown on our register. However, we want to do more and there is already a self-build policy in the Cranbrook Plan. The Council has also made £500,000 available for capital spend from the 2020/21 budget for a pilot project for the direct provision of self-build plots through purchasing suitable land, servicing the land and marketing it for self-build plots. There are specific policies in emerging and made Neighbourhood Plans to help deliver more plots for self-build and the Council supports the Neighbourhood Plan work on this.
- 1.524. The new local plan represents an opportunity to increase custom and self-build opportunities further and the policy applies everywhere, except for the Cranbrook Plan area which has its own policy.
- 1.525. The minimum site size for this policy is 20 dwellings, where a 5% rate can achieve at least 1 custom or self-build dwelling, but it does not preclude smaller sites from providing self-build or custom build dwellings.
- 1.526. A mix of service plot sizes helps to meet the range of demand and affordability. Larger sites provide the opportunity for affordable dwellings. We plan to provide additional guidance on elements of this policy, including a definition of affordable for custom and self-build housing. The expectation is that the development makes provision for on-site service plots.
- 1.527. Policy criteria on Rural Exception and First Homes Exception sites would need to be met if custom or self-build housing were to be proposed on those sites.

Evidence

- 1.528. Since 2016 we have kept a register of people who want to build their own home in East Devon. This gives us a general indication of the level of interest in self-build and we also collect information on things like how much people have to spend on a plot and their location preferences. The latest Self-Build Monitoring report published February 2022 shows that around 190 individuals joined the self-build register from its launch in March 2016 to the end of October 2021. It is assumed that if opportunities for self-build are increased, more people will build their own home than have joined the self-build register, but our policy includes provision for alternative delivery mechanisms if plots remain undeveloped.
- 1.529. We will need to assess through our viability study the impact of the policy on housing site viability, particularly the percentage of self-build on and the 20 dwelling threshold.

Sub-dividing or replacing existing dwellings

- 1.530. Self-contained flats resulting from house conversions can be a valuable addition to the housing stock. They can be effective in meeting some households'

changing needs for housing. The reuse of existing dwellings and building conversions significantly reduces the embodied carbon footprint of the development, as well as re-using existing resources, and locating development within existing communities.

- 1.531. The replacement of existing buildings is restricted by the proposed policy on embedded carbon. This seeks to promote the retention of existing buildings, so that their replacement will only be supported in exceptional circumstances. The following policy sets out the criteria that should be met if a replacement dwelling meets the exceptional circumstances set out in the embedded carbon policy.

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

Any residential Sub-division of existing dwellings or buildings should:

- Avoid any materially adverse impact on the character and amenities of the surrounding area or on the existing building;
- Minimise hard surfacing of front gardens and ensure hard surfaced areas are permeable and/or discharge to a soakaway (subject to soil conditions being suitable);
- Ensure that adequate space is provided for bicycle/mobility scooter storage; and
- Provide an adequate external area for car parking, waste/recycling storage and for any shared use area such as outdoor drying of washing.

Outside of a settlement boundary, any applications for residential subdivision or conversion that involves extensions to accommodate the conversion will be judged against the relevant criteria set out below for replacement dwellings outside of a settlement boundary.

Replacement of existing dwellings

Exceptionally, where replacement dwellings can be justified (including under the embedded carbon policy) all the following criteria should be met:

- Prior to the first occupation of any replacement dwelling, the dwelling which is to be replaced must be demolished;
- The replacement dwelling must be positioned on the footprint of the existing dwelling, unless there is a clear planning or environmental benefit to justify an alternative location within the existing curtilage; and
- The height of the replacement dwelling should be no higher than the dwelling to be replaced unless it can be demonstrated that an increase in height will be compatible with neighbouring residential amenities, the street scene or the wider landscape.

Additionally, **outside of a settlement boundary**, the following criteria should also be met:

- The footprint of any replacement dwelling (or subdivided building) must not exceed by more than 30% of the external volume of the dwelling to be replaced (or the building to be converted/subdivided) and
- The curtilage of the proposed replacement (or sub-divided/converted) building should be no greater in area than that of the existing dwelling/building.

A Supplementary Planning Document will be produced to set out details about how this Policy will be implemented.

Justification for inclusion of policy

- 1.532. This policy supports the Council's Housing Strategy and is also part of the local plan's strategy for supporting the transition to a low carbon future, in line with the NPPF.
- 1.533. For this policy, a dwelling is a building with planning permission for use class C3 (residential) or its residential use is evidenced as lawful; and 'existing' means the dwelling is habitable and permanent (meaning the planning permission is not temporary, i.e. the dwelling approved is not conditioned to be removed or subject to a legal agreement requiring removal; or the unit cannot be moved i.e. not a caravan or mobile home). This avoids creating a new dwelling in a place where a dwelling does not exist, including derelict and abandoned properties.
- 1.534. The policy does not impose a specific restriction on the size of conversion or replacement dwellings within settlement boundaries, but outside of this restrictions are proposed so that smaller dwellings are retained, mindful that larger dwellings are generally more expensive, and affordability is a significant issue, particularly in rural areas. The strategy of the plan only to define settlement boundaries for certain settlements means that there will be settlements where the scale of replacement dwellings/sub-divisions/conversions will be limited in line with the criteria proposed. We could take a more 'relaxed' approach and not impose additional restrictions unless the site was 'isolated' from any settlement and views are sought on the relative merits of such an approach and how criteria could be worded to avoid inappropriate development in rural areas and to maintain a stock of smaller homes.
- 1.535. For the avoidance of doubt, the preferred local plan Policy 46 on Exception sites addresses the specific issue of conversion or replacement of dwellings on Exception sites, to avoid the potential loss of affordable housing to market housing over time.
- 1.536. Some forms of housing development in the countryside such as re-use of redundant or disused buildings in the countryside and Use Class Q permitted development (for change of use from agricultural building to residential use, covered by GPDO legislation), are not replacement dwellings so are not subject to this policy, although other local plan policies may apply.

Subdivision/Conversion

- 1.537. Part of this policy relates to the subdivision of existing dwellings and conversion of other buildings, to create self-contained dwellings which add to the dwelling stock. There is a separate policy in the plan on multiple occupancy of housing, a type of development which generally does not create net additional self-contained dwellings.

- 1.538. NPPF makes clear that the local plan should promote an effective use of land in meeting the need for homes. This policy aligns with the broader strategy in the plan for accommodating objectively assessed needs in a way that makes as much use as possible of previously developed land, boosts housing supply through subdivision, and meets need. Most subdivisions/conversions would be below the one hectare or less than 30 dwellings threshold in NPPF for small sites delivery. The net increase in dwellings on these sites would count towards the percentage target for small sites in the Strategic Policy on the level of housing development.
- 1.539. This part of the policy aligns with Policy 32 on embodied carbon within an existing building, and with NPPF which encourages the reuse of existing resources. By allowing subdivision/conversion, this approach also reduces the risk of dwellings being left vacant, becoming derelict over time, and eventually being lost from the dwelling stock. This helps to avoid the need for additional housing to be built elsewhere to replace that loss.
- 1.540. The policy also supports local plan policy on design. Conversions of buildings through change of use from non-residential use are also subject to other policies in the plan relevant to those uses, including retention of use subject to specified circumstances. Separate local plan policy covers conversions of listed buildings to residential and other uses.
- 1.541. The policy focuses on reducing and mitigating the impact of conversions. For example, conversion to flats can have undesirable environmental effects such as hard surfacing of garden areas, external staircases and unattractive refuse storage areas that can damage the area's character and amenity.

Replacement dwellings

- 1.542. Another part of this policy focuses on replacement dwellings that are an exception to Policy 32 on Embodied Carbon, a policy which generally restricts replacement of existing dwellings. Replacement involves the demolition and removal of one or more existing dwellings and building the same number of new dwellings, not necessarily on the same footprint, but in the same curtilage. The NPPF does not define 'replacement', so the policy draws on case-law.
- 1.543. Replacement of a dwelling can be beneficial where it improves the quality of the housing and is sensitive to the area's characteristics and qualities. However, the cumulative impact of development that replaces existing dwellings can lead in the long term to the urbanisation and erosion of the character of countryside areas.
- 1.544. The policy focuses on reducing and mitigating the impact of replacement dwellings, such as the impact on neighbours. Not all replacement dwellings occupy the same footprint as the existing dwelling, so the policy also ensures there is a mechanism to avoid the risk of creating a second dwelling or planning

unit on the site, for example by requiring the existing dwelling is demolished before the replacement dwelling is occupied.

1.545. The policy addresses issues related to the conversion of existing dwellings and buildings to residential use and the replacement of existing dwellings. All the issues listed in the preferred policy are raised in the NPPF and related PPG. The policy reflects national planning and housing policy, particularly regarding the opportunity to boost housing supply and mix of housing to meet needs. The main matters where the Council relies on a local policy component are:

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

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

45. Policy – Householder Annexes, Extensions, Alterations and Outbuildings

Proposals for ancillary or incidental annexes, extensions, alterations, and outbuildings, relating to existing dwellings shall:

- provide a written justification detailing the existing use of the main dwelling and the proposed use and requirement for the development; and
- be of a subordinate scale, form, and mass to the main dwelling and curtilage, and shall accord with the design principles of the Local Plan; and
- be located entirely within the existing curtilage of the main dwelling; and
- not increase the habitable Gross Internal (floor) Area¹ of the original dwelling by more than 30%, unless the increase is required to enable the host dwelling to conform to nationally described technical housing standards² for its original intended use. In exceptional circumstances, development may be considered where a minor increase above 30% is justified to improve design standards.

The development of annexes, extensions, alterations, and outbuildings, will not usually be permitted where the host dwelling is:

- an affordable dwelling
- an agricultural worker's dwelling
- in use as a dwelling house permitted only by virtue of The Town and Country Planning (General Permitted Development) (England) Order 2015 or any subsequent version of that order

A condition and/or legal agreement may be required to control future use as incidental or ancillary to the use of the main dwelling, preventing subdivision or use as a separate planning unit, in perpetuity. Permitted development rights for future extensions or outbuildings may also be restricted by condition.

1. [Technical housing standards – nationally described space standard](https://www.gov.uk/technical-housing-standards) - GOV.UK (www.gov.uk)

2. Technical housing standards - nationally described space standards [Technical housing standards – nationally described space standard](https://www.gov.uk/technical-housing-standards) - GOV.UK (www.gov.uk)

Justification for inclusion of policy

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

Annexes

- 1.549. Residential annexes can also provide genuinely flexible, accommodation that can be adapted and re-adapted to meet the changing needs of family circumstances over time. Creation of an annexe to an existing dwelling, whether the main dwelling is located inside or outside settlement boundaries, can often create a useful facility for the support and care of family members.
- 1.550. This is a type of residential accommodation which might reasonably be construed as being self-contained and capable of being occupied without undue call upon the principal residence/ host dwelling. An annexe might provide bathroom and kitchen facilities and sufficient space for living and sleeping. To avoid creating an additional dwelling or separate planning unit the use of the annexe needs to be restricted to being an ancillary and subordinate part of the principal residence/host dwelling. The annexe size should not undermine its subordinate role. Nor be so large that it is impractical and is then let separately from the main dwelling, creating sub-standard accommodation with inadequate access, amenity and space.

Residential extensions, alternations, and outbuildings.

- 1.551. This type of development adds to diversity and flexibility in the housing stock but it needs to respond positively to the context and character of existing areas. Extensions, alterations and outbuildings are part of the principal residence/host dwelling. Some development creates ancillary accommodation which provides habitable rooms but does not extend to such an extent that it can be construed as providing facilities that would enable its independent occupation without call upon the principal residence/ host dwelling.

- 1.552. There can be concern that extensions in combination would lead to an increase in the proportion of larger dwellings, reducing the availability of smaller housing and creating an imbalance in the local dwelling stock. There are additional concerns that extensions and subsequent subdivision can create additional dwellings in the countryside, and not be consistent with policy. A further complication can arise with Class Q permitted development, where the approval is implemented, changing the use to residential, swiftly followed by a full application to extend the unit creating a larger dwelling. This can be very difficult to resist.
- 1.553. Permitted development rights allow house extensions and outbuildings without needing to apply for planning permission if specific limitations and conditions are met. This policy addresses the issues for those extensions, alterations, and outbuildings that exceed the specific limitations and conditions. In many cases an application for householder planning permission will be required. Occasionally other types of planning permission are necessary.
- 1.554. The policy addresses the relevant issues. All the issues listed in the preferred policy are raised in the NPPF and related PPG. The policy reflects national planning and housing policy, particularly regarding the mix of housing to meet needs and housing quality. The main matters where the Council relies on a local policy component are:
- Appropriate locations – consistent with the settlement strategy
 - Avoiding adverse impacts on neighbours and impacts of cumulative extensions
 - Avoiding unplanned creation of additional dwellings or separate planning units.
- 1.555. No specific local evidence is needed to justify this policy, but the plan will need to identify what appropriate evidence will need to be provided by developers regarding the relationship with the principal residence/host dwelling and matters related to over-development and impacts on neighbouring uses. Detailed guidance would need to be provided in an SPD. Annexes, extensions, alterations and outbuildings should not cause unacceptable impacts for the occupants in the main building, annexe or outbuilding, or for neighbours from e.g. amenity, light, noise, odour, smoke, dust, privacy, visual impacts, overbearing, over-shadowing, scale, form, mass, design, material and any other pollutants. It will need to address layout and density, spacing, detailing and materials as well as internal space standards, accessibility, privacy, daylight and ventilation, safety and security. The physical and functional links between an annexe or outbuilding and the principal residence/host dwelling will also be relevant.
- 1.556. For the avoidance of doubt, proposals for annexes, residential extensions, and outbuildings on Exception sites will be subject to the local plan policy on Exception sites.

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

In circumstances where planning permission is required for the conversion or change of use of existing homes and buildings in other uses to shared accommodation including hostels and houses in multiple occupation, permission will be granted on sites at locations that are suitable for the use, where it can be demonstrated that there will be no significant impact on the following:

- i. Privacy of existing homes and gardens of neighbours - must be maintained and ensured for new occupiers. The existing home or building must be capable of conversion without causing harm to the amenities of future occupants, neighbours and the wider area;
- ii. Vehicular access or car parking – both in terms of highway safety or visual, noise or light impact on neighbours. Provision must be made for on-site car parking and cycle storage facilities, unless it can be demonstrated that the site is sustainably located with access to regular public transport or is within an 800 metre walking distance of a defined town centre;
- iii. Service provision – there should be sufficient space for communal areas at an appropriate standard, to accommodate adequate bin storage and collection, and accommodate other ancillary functions for the increased number of residents;
- iv. Internal standards for living space and good communal facilities are suitable for the intended occupiers, individually and in total
- v. Housing stock – to protect the existing small family housing stock, and to allow for adequate residential space standards in the proposed subdivided dwelling. The subdivision of existing properties of less than 4 bedrooms will not be permitted.

Applicants will be expected to submit evidence to demonstrate that there will be no significant impact on the criteria outlined above.

Hostels and Houses in Multiple Occupation will need to evidence how a good standard of management will be provided.

A financial contribution towards affordable housing will be sought from large HMO development of 20 or more units, subject to negotiation and viability

The Council will resist the loss of existing hostels and HMOs, unless there is evidence of a lack of demand for this type of accommodation within the settlement, or there is viability and building condition evidence to demonstrate that retention and improvement of the accommodation is not viable or achievable.

A Supplementary Planning Document will be produced to set out details about how this Policy will be implemented.

Justification for inclusion of policy

- 1.557. Houses in Multiple Occupation (HMOs) are properties occupied by unrelated individuals who share basic amenities such as a kitchen or bathroom. The traditional source of HMOs tends to be larger, older single family dwelling houses, located in areas with good access to public transport (in particular bus routes) and local services as well as large single dwelling houses that can be sub-divided into much smaller and more affordable accommodation.
- 1.558. The NPPF does not define Houses in Multiple Occupation or hostels. The definition of HMO used by the plan is listed in the Glossary. HMO development is subject to the use class order:
- *Larger HMOs housing more than 6 people.* These are classified as *sui generis* use and require planning permission.
 - *Class C4 (Small houses in multiple occupation).* Small shared dwelling houses occupied by between 3 and 6 unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom. Change of use between C3 (residential use) and C4 use classes is permitted development and does not require planning permission (unless an Article 4 direction applies). New build C4 or change of use from non-C3 use to C4 (and vice versa) requires planning permission.
- 1.559. Hostels are a type of HMO providing no significant element of care. They fall into the *sui generis* use class for the purposes of planning.
- 1.560. The LHNA 2022 ORS study does not provide specific evidence on HMOs in East Devon regarding the need for HMOs or the level of stock. HMOs are part of the private rented housing market, so are included within the ORS analysis of private rented housing need.
- 1.561. However, the LHNA 2022 provides evidence that from the demographic data for East Devon is that single person households aged 15-24 years are projected to fall to a rounded figure of zero by 2040. At the same time, the number of 'Other' households headed by someone aged 15-24 years is projected to rise by 220 households in the same timeframe. Therefore, there is going to be a significant decline in headship rates for single persons aged 15-24 years in East Devon. At the heart of this issue is that the increasing pressures for social housing and rising private rents have seen fewer young households living on their own and more living in HMO type accommodation. Changes to the benefit system introduced in the past 10 years have seen these pressures amplified.
- 1.562. Whilst co-housing may be a part solution to this, the LHNA 2022 concludes that this type of property is more suited to university areas. The situation in East Devon is a declining headship rate among younger households who are more likely to be seeking affordable housing. As a result of the declining headship rate, and information drawn from Figure 30, there is no strong evidence suggesting studio apartments are required for younger persons.

- 1.563. Consequently, the Council expects the need for hostels and Houses in Multiple Occupation to continue to meet the need for low cost, private rented housing. Many people living in this type of housing will only be able to afford shared accommodation, and so they are important for people on low incomes and those seeking temporary accommodation. This policy addresses the development issues related to this type of housing. Loss of HMOs through conversion to self-contained dwellings will be resisted unless the applicant can demonstrate the absence of need for this type of accommodation.
- 1.564. The policy does not include a size threshold as this is subject to the Town and Country Planning (Use Classes) Order 1987 (as amended) relating to change of use.
- 1.565. As well as planning requirements, some HMOs require an HMO licence. The Council determines HMO Licences in order to protect the health, safety and welfare of the occupying tenants of such residential premises. The mandatory HMO licensing scheme covers properties occupied by five or more people making up two or more households. The District Council maintains a register of all HMOs in East Devon that are licenced by the Council under the 2004 Housing Act. Licencing relies on a different definition and more details are on the Council's website. There are currently 38 licensed houses in multiple occupation on the Council's register, permitted to house 318 occupiers. HMOs with less than 5 people are not covered by this scheme so are additional. Work is in progress to estimate the number of smaller HMOs, and to understand if there are particular HMO stock condition issues. Licencing of HMOs is not part of the planning regime.
- 1.566. Unlike some Districts, for example in towns with a large student population, East Devon does not have an Article 4 Direction to withdraw permitted development rights for the change of use from dwelling houses (Use Class C3) to small-scale HMO (Use Class C4). At this time there is no evidence that there are particular concentrations of HMOs or hostels, where the potential scale or concentration would warrant the use of this mechanism to avoid or mitigate impacts from further development.
- 1.567. The policy addresses the relevant issues. All the issues listed in the preferred policy are raised in the NPPF and related PPG. The policy reflects national planning and housing policy, particularly regarding the mix of housing to meet needs and housing quality.
- 1.568. The Council will keep the policy under review, and any additional evidence about the concentration of shared housing and housing stock conditions will be considered when available.

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

At this stage we are awaiting the findings of the Gypsy and Traveller Needs Assessment. A detailed policy setting out the level of need and criteria to be considered in determining planning applications will be produced in due course.

This proposed policy will need to address the following issues

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

New Sites

- Where there is demonstrable need to be met in the District, specifying the number of gypsy and traveller pitches to be provided, as part of the mixed use development at the New Settlement in East Devon
- Locations for sites (allocated and/or permissible), subject to site suitability, assessed against relevant policies in the plan and satisfying requirements of the following criteria:
 - Suitable location, to be inside or adjoining a settlement boundary, or within 15 minutes travel time by safe, walking, cycling or public transport providing access to a range of services including school and health services
 - Sites proposed in the countryside to require evidence that proven District need cannot be met elsewhere in East Devon
 - Size of site and number of pitches is appropriate in scale and size to the nearest settlement in the settlement hierarchy and its range of services and infrastructure
 - Preference for site expansion and intensification, subject to maximum site threshold. If expansion or intensification is impractical, then take account of the cumulative impacts of additional sites on the character of a local area and on a local community
 - Assimilate sites into surroundings/landscape without significant adverse effect

- Requirement for acceptable vehicular access, on site turning, parking and servicing
- Avoid sites vulnerable to flooding or affected by any other environmental hazards that may affect the residents' health and welfare
- Site to access essential utilities - water supply, sewerage, drainage, waste disposal

Safeguarding Sites

- Safeguard existing authorised sites, new permissions, allocations for Gypsy and Traveller Use and for Travelling Showpeople use for the number of pitches/plots permitted. This includes safeguarding provision already made for serviced permanent pitches at the Cobdens and Treasbeare Expansions Areas in the emerging Cranbrook Plan DPD

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

Justification for inclusion of policy

1.569. National planning policy¹¹ requires the LPA to assess the accommodation needs of Gypsies, Travellers and Travelling Showpeople and to set pitch and plot targets for Gypsies and Travellers and for Travelling Showpeople that address the likely permanent and transit site accommodation needs of travellers in the District, working collaboratively with neighbouring local authorities.

Need

1.570. Evidence of the needs for Gypsy and Traveller and Travelling Show people accommodation is provided by a Gypsy and Traveller Accommodation Assessment, not by the 2020 LHNA. Previous evidence in the GTAA 2015¹² established that there were existing pitches distributed throughout East Devon, mainly concentrated in western areas of the District, close to main travel routes, particularly the A30. Most of the immediate need arises from overcrowding of,

¹¹ Planning policy for traveller sites 2015 Department for Communities and Local Government
[Planning policy for traveller sites - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/424811/Planning_policy_for_traveller_sites_2015.pdf)

¹² INSERT WEBLINK

and newly formed families (usually children reaching maturity and having their own children), on existing sites who wish to stay close to their extended family.

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

Supply

- 1.572. Work is in progress on the supply assessment. Planning policy requires the LPA, in producing a local plan, to identify and update annually a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against locally set targets; and identify a supply of specific, developable sites, or broad locations for growth for years 6-10. If an LPA cannot demonstrate an up-to-date 5 year supply of deliverable sites then this is a significant material consideration in any subsequent planning decision
- 1.573. Existing planning permissions - The plan will require up to date evidence about the supply of pitches available from sites with planning permission that have not yet been implemented. It is needed both for plan making and for assessing the 5 year supply position for Gypsy, Traveller and Travelling Showpeople accommodation. The latest evidence is published in "Status of Traveller Sites" March 2019¹³ when there were 49 pitches (1 being temporary) on authorised permanent sites, and 5 pitches on authorised transit sites.
- 1.574. Allocations - Sites providing pitches for gypsy and traveller and travelling show people use can be allocated in the development plan. The Cranbrook local plan provides for 15 pitches on the Cobdens and Treasbeare Expansion Areas in 2 site allocations on land being made available by the East Devon New Community partnership. These sites would contribute to supply in the 2020-2040 plan period and enable families on the overcrowded Sowton and Broadclyst sites to remain living locally as family groups. 15 pitches would fulfil almost all of the immediate District need for 16 pitches identified by the previous 2015 GTAA. Whilst these sites are available now and offer a suitable location, they do not yet have planning permission. For the present they are regarded as developable. When there is evidence that there is a realistic prospect of delivery in the next 5 years, the Council will count them as deliverable for the purposes of the 5 year supply assessment required by NPPF.

¹³ [monitoring-report-as-at-mar-2019.pdf \(eastdevon.gov.uk\)](#)

- 1.575. Call for Sites - The 2021 Call for Sites for HELAA resulted in only 2 sites being put forward as available for Gypsy and Traveller use. When the GTAA evidence is available, if there is need for additional sites to be identified, the Council will assess site suitability, availability and achievability, and consider whether sites should be proposed to be allocated in the local plan.
- 1.576. Bricks and Mortar housing - As well as a need for sites providing pitches and plots for Gypsy and Traveller and Travelling Showpeople, there will be some requirement for bricks and mortar housing to meet their needs. The new GTAA will identify need. The Council considers that this will be met by the provision requirement for general housing in Strategic Policy 4.
- 1.577. Travelling Showpeople sites supply - Prior to 2009 there was one established Travelling Showpeople site in East Devon for a single family which predates the planning system. One site in East Devon close to Exeter and the M5, was granted planning permission for 9 plots in 2011 (09/1486/MFUL at Clyst St Mary). This accommodated three displaced plots in Teignbridge and a further 6 plots for extended family members on other, overcrowded, sites in south west England. At the time of the adoption of the East Devon Local Plan 2011 – 2031 the Council considered that East Devon had exceeded the requirement for provision in Devon and would not need to identify any further sites during the Plan period. The new GTAA will reconsider the supply of sites and plots for Travelling Showpeople.
- 1.578. The policy addresses the relevant issues. All the issues listed in the preferred policy are raised in national planning policy. The policy reflects national planning policy. The main matters where the Council relies on a local policy component are:
- Plan period targets for the scale of provision to be made
 - Maintaining a 5 year supply
 - Site allocations
 - Appropriate locations
 - Safeguarding
- 1.579. Additional evidence will be needed to justify local components of the policy
- GTAA 2022 (being commissioned)
 - Supply assessment, including the 5 year supply position (work in progress)
 - Site assessments and selection (if allocations are needed).

Dwellings in the countryside

- 1.580. The plan's spatial strategy directs most housing development to settlements, based on the settlement hierarchy. Sustainable development should be located where it will enhance or maintain the vitality of rural communities and avoid building new, isolated, homes in the countryside.

- 1.581. Strategic Policy 9 sets out the strategic approach to development outside of settlement boundaries. Two policies set out the circumstances where limited housing development in the countryside would be appropriate. These policies support the strategic policy on development outside settlement boundaries as well as the two strategic policies on housing. One policy is about exception sites which are adjacent to or abutting settlements. The other policy applies to development adjoining settlements but would also be one of the few circumstances where new isolated dwellings in the countryside may be appropriate. It addresses housing for rural workers.
- 1.582. The plan does not propose additional policy regarding the other few circumstances where isolated dwellings in the countryside are appropriate. Instead the LPA relies on national policy, currently the NPPF paragraph 80.

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

Rural Exception Sites

A development proposal for a Rural Exception site will be supported, provided that:

- 1) the site is less than 15 dwellings or 0.5 hectares
- 2) It provides a mix of types of affordable housing meeting proven, unmet need of the local community, evidenced by the latest East Devon Local Housing Needs Assessment, Housing Needs Surveys produced by Devon Communities Together, and other local data such as a Neighbourhood Plan, Parish Survey or Parish Plan; and
- 3) Occupiers to have a local connection with the settlement or group of settlements

First Homes Exception Sites

A development proposal for a First Homes Exception site will be supported subject to the provisions for First Homes in Policy 39 (Affordable housing) including local eligibility criteria, provided that:

- 1) The site is not allocated for housing and is beyond, and either abutting or physically closely related to, the settlement boundaries of villages, or physically very well related to the built form of villages where there is no settlement boundary;
- 2) The site is not in an Area of Outstanding Natural Beauty and not at settlements in Designated Rural Areas
- 3) The site size is proportionate to the existing settlement, that is no more than 10 per cent of the number of households at the time of the planning application
- 4) The affordable housing meets proven, unmet needs of the District, as evidenced by the latest LHNA; and
- 5) There is only a small proportion of other types of affordable housing included on the site

For Rural Exception Sites and First Homes Exception Sites

A development proposal for a First Homes Exception site will be supported, provided that; and provided that:

- 1) evidence demonstrates secure arrangements will be achieved ensure the housing will remain affordable and available to meet the continuing needs of local people
- 2) A small element of market housing may be included, to provide sufficient cross-subsidy to enable the delivery of affordable homes without grant funding. At least 66% of dwellings proposed must be affordable dwellings.
- 3) If occupiers meeting the relevant local connection criteria cannot be found then a cascade approach is applied [details of local connection criteria to be set out in the Supplementary Planning Document]
- 4) The policy applies to conversion or replacement of dwellings on these sites
- 5) Preclude extensions of dwellings on Exception sites where this would result in the affordable housing on the site becoming too expensive compared to disposable incomes in the area, or where proven need exists for smaller affordable dwellings.
- 6) The dwellings are retained in perpetuity, subject to national policy provisions.

A Supplementary Planning Document will be produced to set out details about how this Policy will be implemented, including clarifying what is meant by close proximity, and abutting or physically close to a settlement boundary.

Justification for inclusion of policy

- 1.583. Exception sites are sites brought forward outside of development plans, beyond settlements, in order to deliver affordable housing. Exception sites deliver housing as an 'exception' to other policies in the development plan which otherwise restrict development. Following the change in Government policy which came into effect in June 2021, there are now two types of exception sites: 'Rural Exception' sites and 'First Homes' Exception sites.
- 1.584. The policy is essential in this rural area, where affordability is such an issue. It enables the local plan to support the Council Plan's aim to deliver more affordable housing and aligns with the East Devon Housing Strategy, offering new opportunities for the emerging models for affordable housing delivery. As the local plan's response to NPPF 2021 and the Written Ministerial Statement (WMS) of 24 May 2021, the policy supports opportunities to bring forward exception sites providing affordable housing to help meet identified needs. It complements Policy 39 to address affordable housing needs in East Devon.
- 1.585. Government policy towards Rural Exception sites differs from that towards First Homes Exception Sites, and the local plan policy reflects this. They vary in the following matters:
- The type of affordable housing. First Homes Exception sites focus on First Homes which the Government defines as affordable housing, and only a small

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

- The level of discount for discounted market housing. First Homes are 30% discount, and a maximum £250,000 first sale price. The discount could be 40% or 50% if this is set out in the local plan policy, and can be justified (including viability evidence). Informed by the LHNA 2022, the Council proposes that this policy uses a 30% discount for First Homes in East Devon and justifies this in the explanation set out in the 2022 Housing Topic Paper.
- Location. First Homes exception sites could only be adjacent to Exmouth, Sidmouth, Honiton and Seaton (i.e. outside the Designated Rural Area), not in the AONB. Rural Exceptions sites are not precluded from the AONB or DRA.
- Site size - Rural Exception sites are 'small' (the previous local plan has a 15 dwellings threshold) but First Homes Exception sites are 'proportionate to the settlement size'.
- Occupier restriction/Eligibility. There is a local connection test for Rural Exception sites. The Council has previously applied a cascade approach with no time limit. A local connection test can be applied to First Homes Exception sites but only for 3 months, before reverting back to national policy which doesn't have a local connection requirement.
- Perpetuity. Use of S106 agreements to retain affordable housing in perpetuity is similar for both sites but mechanisms are available to vary or remove restrictions. Differences are due to the mix of affordable housing. First homes are an affordable home ownership product. On Rural Exception sites the issues of staircasing for example can impact on Shared Ownership if no grant funding occurred.

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

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

1.588. This policy provides detail by :

- a

- 1.589. The East Devon Local Housing Need Assessment 2022 provides evidence about the scale of need for affordable housing and the scale of need for First Homes. The Council has relied on this evidence to justify the Affordable Housing Policy in this plan. More information about how the Council has used the evidence to justify policies about affordable housing is set out the 2022 Housing Need, Supply and Requirement Interim Topic Paper.
- 1.590. The LHNA 2022 does not provide evidence about affordable housing supply and the Council does not forecast plan period supply that might be achieved from either Rural Exception or First Homes Exception sites. For housing supply purposed these would count in the housing supply either as Neighbourhood Plan allocations, if allocated in made plans, or otherwise as windfalls.
- 1.591. Additional evidence will be needed to justify local components of the policy, notably what is meant by 'small' and 'proportionate'. The Council can consider whether there should be local criteria relating to First Homes. This would need evidence to justify any higher discounts, higher percentage of First Homes and any local connection criteria.
- 1.592. The May 2021 Written Ministerial Statement allows LPAs to introduce local requirements relating to First Homes through a policy statement in advance of the local plan. The Council produced an Interim Guidance Note in February 2022 on First Homes in East Devon ahead of this local plan. When adopted, this policy and the related Supplementary Planning Document will supersede that guidance.

49. Policy – Housing for rural workers

1. Applications for rural workers dwellings outside settlement boundaries will be permitted where:
 - a) It can be demonstrated that the nature and demands of an existing rural business are such that a full time worker has an essential need to be permanently resident at or near their place of work so they are available at most times;
 - b) The need cannot be met within a nearby settlement, or by existing housing at or near the site or through the conversion of a suitable redundant or disused rural building at the site;
 - c) The size and scale of rural workers dwellings will be commensurate with the scale of the operation and designed to reflect the location and setting of the proposed site;
 - d) The development will minimise the visual and environmental impact by locating the dwelling close to existing buildings /dwellings, where practical for its purpose;
 - e) The dwelling size is a maximum of 150 sq.m (gross internal area). Exceptionally a larger dwelling may be considered where evidence demonstrates that this is commensurate with the scale of the established functional need; and
 - f) The rural enterprise has been established for at least three years, is currently financially sound based on functional and economic tests, and the business has clear prospects of remaining viable.
2. The Council will take into account the history of the holding, the recent pattern of land use and building and, recent disposals of land and property when determining a planning application for housing for rural workers.
3. Where an agricultural, horticultural, forestry or other rural business is not yet established or the need is unproven, then a temporary dwelling such as a mobile home or caravan, may be permitted for a time limited period of up to three years, until the economic viability of the enterprise is established, subject to:
 - i. Meeting the criteria of 1b) to 1e) above;
 - ii. A firm intention and ability to develop the enterprise; and
 - iii. The business has realistic prospects of meeting functional and economic tests.
4. Permission for a rural worker dwelling will be subject to an occupancy condition to ensure that it cannot be sold on or sublet for general accommodation unrelated to the enterprise. Removal of such a condition will only be permitted where there is clear evidence that there is no need for the condition to remain in place.
5. Any permission granted will be tied through legal agreement to the business holding.
6. Extensions to or replacement of agricultural or forestry or rural business-related dwellings will require a reassessment of need, excluding minor works.
7. Exceptionally, temporary or seasonal accommodation requirements to serve rural enterprises will be considered on a case-by-case basis.

A Supplementary Planning Document will be produced to set out details about how this Policy will be implemented.

Justification for inclusion of policy

- 1.593. Housing need includes the need for new dwellings for rural workers. For the purposes of this policy, a rural worker is a person whose place of work is located in, and related to, the countryside and is a person employed in agriculture, forestry or a similar, land-based rural enterprise. Employment on an assembly or food packing line, or the need to accommodate seasonal workers for example, will generally not be sufficient to justify building isolated rural dwellings.
- 1.594. To promote sustainable patterns of development rural workers will usually be expected to find housing in existing rural towns and villages. However, an exception can be justified where it can be demonstrated that a rural worker has an essential need to be available at most times as part of the operation of a rural business in accordance with national policy and PPG regarding the need for isolated homes in the countryside for essential rural workers.
- 1.595. This policy supports enterprises in the rural economy whilst limiting sporadic development in the countryside. From time to time, there may be special circumstances that justify this taking place; for example, it may be essential for a rural worker to live permanently at or very near their place of work. Whether this is essential depends on the needs of the enterprise and not on the personal preferences or circumstances of any of the individuals concerned. Need can include those taking majority control of a farm business. The preferred policy does not set out detailed policy on 'succession' need, and the Council considers this is more appropriate to the detailed guidance on policy implementation that an SPD can provide.
- 1.596. When considering such proposals, the history of the holding, the recent pattern of land use and building and, recent disposals of land and property, will be taken into account. The recent sale of land and property could constitute evidence of lack of need. Any existing or permitted dwelling serving or closely associated with the holding has been sold or changed from residential use, or separated from the holding or agricultural buildings converted to unrestricted residential development (including Use Class Q) within the previous three years will count against the need assessment.
- 1.597. The policy proposes a maximum size of dwelling, at 150 sq.m of Gross Internal Area floorspace, which has been informed by planning precedent in East Devon, including appeal decisions. Internal living space including internal areas/circulation/stairs and storage, plus garage (internal or detached) are counted in that area. This threshold recognises that housing for an agricultural worker may include additional space requirements, such as a boot room, utility

and ground floor shower room; and only in respect of the principal dwelling on a holding further space may be required to accommodate an office. Only exceptionally might the Council consider a dwelling above the threshold size, and evidence will be required to demonstrate why the additional floorspace is essential for the proper functioning of the enterprise. For the avoidance of doubt, any uplift from the floorspace standard would not be supported, if proposed simply to provide additional living accommodation.

1.598. Robust evidence will need to be provided by applicants regarding functional and economic tests, and occupancy/eligibility criteria. This will require a business plan to set out projected future operations, rural business financial assessment, and demonstrate future operational viability. [The plan will indicate either that the tests are to be set out in an appendix in the Plan or they could be in an SPD].

1.599. The approach of permitting a temporary dwelling on the holding for a limited time allows time for evidence to be gathered to demonstrate the viability of a new enterprise. Renewal of the temporary dwelling is only considered where it would provide continued occupation whilst a permanent dwelling is constructed on the holding.

1.600. Exceptionally, temporary or seasonal accommodation proposals may be considered. They would need evidence to demonstrate a proven business case for accommodation; that there is no appropriate accommodation available in nearby settlements; and the mitigation of impacts

1.601. The policy addresses the relevant issues, including those raised in NPPF and related PPG. The policy reflects national planning and housing policy, particularly regarding the need to avoid sporadic development in the countryside.

Other housing matters

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

Residential Moorings, Marinas and Houseboats

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

Empty Homes.

1.604. Bringing long term empty homes back into residential use is a priority for the Council, but provided the empty home was last used for residential purposes (with planning permission, or lawful use) then further planning approval for it to be used for housing should be unnecessary. Planning approval may still be

needed for other reasons. Other policies would guide redevelopment, conversions, extensions and alterations or changes to other uses, enabling buildings to be brought back into beneficial use. Design and heritage policies may also be relevant.

Principal Residence Requirement.

- 1.605. Parts of the District but not all face high rates of second homeownership, notably in some coastal areas. The Council Plan identifies the need for a study about second homes in East Devon. Concerns include the extent of second home ownership adversely impacting on the affordability of housing for local residents in East Devon. The perceived adverse impact of properties left empty for much of the year, reducing the vitality of local communities, with seasonal impacts on the local economy is another issue. Current information suggests that this issue is limited to a small number of coastal settlements and that the scale of the issue is not such that it warrants a local plan policy. The Council will keep this matter under review through the plan making process, so that the Plan can be informed by relevant evidence, when available.

9. Supporting jobs and the economy and vibrant town centres

- 1.606. Chapter 4 of the plan sets out the preferred Economic Vision and Economic Strategy and the Strategic Policy on employment land, addresses the strategic employment priorities of the area and any relevant cross-boundary issues. They cover the scale and distribution strategy for future employment development in the plan period, and employment site allocations.
- 1.607. Chapter 10 includes the Strategic Policy on the town centre hierarchy and retail provision. Those policies are supported by a suite of non-strategic policies which provide a clear basis for development management and the determination of employment and other economy related development proposals.
- 1.608. For this Chapter, unless otherwise stated, 'employment use' refers to any use where employment is required for that use to effectively function. This includes the following Use Classes: B2, B8, E, C1, F1, F2, and Sui Generis.

50. Policy – Employment development within settlement boundaries

The Economic Development Needs Assessment (EDNA) will provide the evidence to support the detailed proposals in this policy, particularly with regard to the level and type of need for employment land in the District and the existing supply that is available. Once the final EDNA is available the detailed policy wording can be finalised.

This proposed policy will address the following issues

- Supporting employment development on local plan employment site allocations (including mixed use with employment), for the uses set out in relevant policies
- Supporting employment development in Use Classes E(g), B2, B8 for new businesses or relocation or expansion of existing businesses within Settlement Boundaries and part of the Exeter and East Devon Enterprise Zone in the District, on sites not allocated or identified by the plan for other uses, by
 - Concentrating employment development to improve settlement self-containment, with the scale and type of development consistent with the settlement hierarchy and local demand
 - Supporting the roles and functions of the Enterprise Zone
 - Restricting use within or adjoining residential areas to Use Class E(g)¹⁴, subject to permitted development rights and impact on amenity; need for appropriate buffer

¹⁴ which can be carried out in any residential area without causing detriment to the amenity of the area

- Prioritising re-use of existing buildings and previously developed land except where this would result in significant biodiversity loss.
 - Considering new build where there are no available existing buildings, or where the reuse or extension of buildings is impractical or unviable
- In addition, in the seven coastal and market towns of the district, Cranbrook and the second new settlement, ensuring employment development is consistent with and supports town centre policies,
 - Locating Use Class E(c)¹⁵ in town centres unless it is impractical or unviable
 - Outside of town centres, class E(g)(i) (office) development will need evidence (sequential testing) demonstrating why development could not be located on more accessible central site within or close to town centre
 - Supporting mixed use urban regeneration schemes designed to maintain or increase net job opportunities through employment uses, through integrated, well designed, vertical and horizontal mixed use development, with uses, roles and functions appropriate to the location, guided by master-planning
- Within existing industrial estates and business parks, as well as Use Classes E(g), B2, B8, indicating the following uses are considered appropriate up to a specified percentage of site area or floorspace
 - display repair and sale of vehicles, vehicle parts, boats and caravans
 - indoor sports or recreational uses
 - crèches, day nurseries or day crèches
 - a limited element of retailing, including the sale of food and drink for consumption, where this is ancillary to another permitted main use (use classes E(g), B2, B8)
- Locating large-scale warehousing and distribution development only at the new settlement and Tier 1 and 2 settlements, and the Enterprise Zone, subject to criteria
 - only on mixed use or employment site allocations or on larger existing employment sites and
 - providing the ability of those sites to deliver significant high value employment opportunities¹⁶ or transformational development¹⁷ is not compromised

¹⁵ Use Class E(c) The following kinds of services principally to visiting members of the public i. financial services ii. professional services (other than medical services) iii. any other services which it is appropriate to provide in a commercial, business or service locality

¹⁶ A 'high value' employment opportunity will be defined as a job where the annual wage and gross value added (GVA) per worker is above the national average.

¹⁷ A 'transformational' development will be defined as a development which creates and sustains jobs in the digital, green energy and engineering sectors, where the average gross value added (GVA) per worker is above the national average.

- Supporting ‘clean growth’ and ‘net carbon zero’ employment development throughout the District but with a particular focus on the West End of East Devon
- Supporting measures to provide necessary infrastructure and promoting provision of active travel measures to enable employment development proposals to be accessible by walking, cycling and public transport, and that such infrastructure and measures will
 - Not generate traffic of a type or amount inappropriate for the character of existing or improved access roads
 - Not harm character/setting of local settlements or amenity of nearby residents
 - Not harm sites of nature conservation value or archaeological importance or buildings of architectural or historic interest

Justification for inclusion of policy

- 1.609. The Council Plan’s third priority is for a resilient economy. The Council promotes and supports job growth in the District. There are employment opportunities in the traditional employment land use categories of business use, general industrial use and storage/distribution use and “Sui Generis” industrial uses. Tourism, retailing, health care, education and leisure facilities are significant employment generators. Although jobs in these sectors are typically lower paid, they are nonetheless important to the functioning of the district’s economy and the well-being of local communities. Our preference moving forward is to support the creation of new higher value jobs.
- 1.610. East Devon benefits from significant employment opportunities in the western side of the district, more strongly associated with a wider sub-regional functioning economic market area (FEMA). This includes the Science Park and at Exeter Airport and related sites. But East Devon is also a rural and coastal district. There are around 60 traditional business parks and industrial estates across the district, with most being located within and adjacent to the towns. Some employment growth has taken place away from traditional business parks and industrial estates, and will continue to do so, for example through the diversification of the rural economy, the growth of leisure and tourism and the increase in home/remote working.
- 1.611. The local plan will provide for new employment provision to meet the future needs of the District. In the western side of the District, we will respond to increased demand for higher density, high value jobs, encouraging strategic inward investment and transformational sector development. We will also aim to meet the strong unmet demand for industrial premises, particularly for industrial and logistics occupiers in the West End of East Devon. Elsewhere in the District, higher value investment opportunities will also be promoted, though it is more likely that new employment will serve local needs with jobs being provided close to existing and proposed homes so that people have the option of not needing to commute long distances to work.

- 1.612. The policy focuses on planning for sufficient employment sites for industry, offices and warehousing across the District, with appropriate flexibility through a range of available land and premises that can accommodate the changing needs for business start-ups, local employer expansions, relocations and inward investment. New supply for the plan period would be achieved from employment development on local plan site allocations, existing commitments not yet delivered and windfall development.
- 1.613. The preferred policy option is to focus employment development within settlement boundaries. The aim is to continue to meet a high proportion of the level of need for employment land (in Use Classes E(g), B2, B8) with sufficient supply flexibility, at locations that support settlement self-containment, consistent with the settlement hierarchy and the network of centres. These are the places with supporting services and facilities. The EDNA and Employment Land Review will provide evidence about the mix of sites needed to support businesses. It is expected that as well as sites suitable for transformation and high value employment, there will continue to be a need for a wide mix of sites in terms of size and quality to suit the needs businesses now and as they change over time. There will still be a need for traditional industrial estates and business parks. There is a separate local plan policy on the retention of these sites and existing business parks and industrial estates over the plan period.
- 1.614. **New sites** - The ability for new sites to meet need is subject to the Council's evidence (work in progress) to demonstrate that there is a need for specific employment uses and providing this will allow for sustainable growth in suitable locations. The EDNA will identify the scale of need for employment land in East Devon over the plan period. The HELAA will provide further analysis about availability, suitability and achievability of sites put forward for development through the Call for Sites. Employment Land Reviews will provide further evidence about sites' availability and suitability for employment uses. The Council's site selection process identifies potential sites for allocations as employment or mixed use sites.
- 1.615. Policy on employment development at Cranbrook is set out in the Cranbrook DPD, now at an advanced stage of plan-making.
- 1.616. **Office development** is subject to a sequential test, but is primarily directed to the town centres identified on the policies map.
- 1.617. **Warehousing** - The plan will make provision for warehousing, informed by the emerging evidence on employment development need. Warehousing for storage and distribution is a part of the local and regional economy. Efficient distribution infrastructure is essential, supporting the supply chains of modern manufacturing and retailing through 'just in time' systems. This depends on transporting goods and materials, much of it by road in HGVs and can lead to significant traffic movements in a locality. Good access to the strategic road network is critical for distribution nationally and internationally. Warehousing is a relatively low density use of land, in terms of the number of jobs available for local people, and generally not high wages. Warehouses can be substantial buildings on large plots, with considerable visual impact, particularly if concentrated along roadside locations. The preferred option policy therefore directs warehousing to the allocations and existing employment

sites suitable for warehousing to tier 1 and 2 settlements and the new settlement. The policy takes a restrictive approach towards large windfall proposals, and does not support their development elsewhere in the District, particularly in the countryside or if it would reduce the land available for high value and transformational employment development.

- 1.618. **Previously Developed Land** - The plan supports the reuse of previously developed land, and opportunities for regeneration within the settlement boundaries. However, at this time the scale, type and areas for potential regeneration is unlikely to be substantial. The plan therefore does not propose significant areas of 'opportunity zones' for mixed use regeneration, with the flexibility to respond to the challenges of attracting businesses to such areas. Where regeneration opportunities arise, they will need master-planning to help integrate new development with the adjoining area, and provide a quality environment, respecting historic assets.
- 1.619. It may be necessary to consider new build development where no suitable buildings exist or reuse or extension is impractical or unviable.
- 1.620. **Changes of use** - Some changes between uses can already occur on employment sites, for example if the planning approval includes a range of employment uses, subject to conditions and legal agreements. Furthermore, permitted development rights provide flexibility. For example they allow a unit of up to 500 square metres floorspace in 'General Industrial' use (Use Class B2) to be changed to a 'Storage and Distribution' use (Use Class B8). The Council is also mindful of recent changes to the Use Class Order permitting changes between specific categories of use, allowing sites to be used more flexibly. If a building or other land is being used in a way that previously was in Class A1 (shops), A2 (financial and professional services), A3 (restaurants and cafés) or B1 (business) then it is treated as though it is being used for a purpose specified in the new Class E. Change of use to another use within Class E will be allowed without the need for planning permission. This does not impact on Class B2 and B8, but could lead to loss of business uses, weakening the mix of employment opportunities. This is exacerbated by the introduction of new Use Class MA which removes the need for planning permission for changes of use of Class E "commercial, business and service uses" which meet certain criteria to "dwelling houses" (superseding the former Class O), subject to legislation details.
- 1.621. **Mixed use within existing employment sites**, focuses on Use Classes E(g), B2, B8, but the preferred policy recognises that a small amount of other employment uses may be appropriate. It will need to indicate the types that are acceptable, and justify any limit on their development. The changes to the Use Class order brings additional flexibility but could potentially result in a broadening of employment mix, reducing the availability of land and premises for Use Classes E(g), B2, B8. This emphasises the need to ensure that the plan ensures sufficient supply flexibility to provide a range of sites and choice for businesses as their needs evolve.
- 1.622. On larger development allocations there are opportunities for mixed use, so that employment development to accommodate businesses and new jobs will be

required to be provided alongside new housing. The employment will therefore be Use Class E(g) suitable for location in or adjoining residential areas. Retaining Class E(g) on the site is potentially undermined by permitted development rights. If there is evidence on loss of business uses to resident the Council could consider an Article 4 direction applying to one or more specific sites, to control development by requiring a planning application.

- 1.623. **Other locations generating employment.** It is recognised that in this rural district, modest employment growth will also take place away from traditional business parks and industrial estates – for example through the diversification of the rural economy, and the growth of leisure and tourism and increase in home work. This preferred approach does not support widespread dispersal of large scale employment generating uses in the countryside.

51. Policy – Employment development in the countryside

This policy will address the following issues:

Supporting and encouraging businesses in the countryside, where new and existing small scale employment sites will not cause:

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

Any adverse impacts stemming from employment development will be considered against any positive economic, environmental and social impacts gained from that development

This policy will not apply to the existing employment sites at Hill Barton and Greendale Business Parks.

Intensification of existing employment sites in the countryside

This will apply where it is evidenced that the business or employment site or industrial estate in the countryside:

- Is at or close to full occupancy,
- Has a need arising from an existing business on the site and
- Can demonstrate that there no suitable alternative site is available in a nearby settlement with a boundary
- Within the site, expansion of existing businesses in the countryside will be supported through small scale employment development resulting in the intensification of the existing employment site without extending the site, subject to

- Expansion being proportionate to the existing size and scale of site operations
- Prioritising reuse or adaptation of existing buildings to reduce the need for additional built development
- Extending existing buildings only if evidence demonstrates that re-use or adaptation of buildings is not viable or practical

Subject to permitted development, for this policy intensification includes

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

Extension of existing employment sites in the countryside

This will apply where it is evidenced that the business or employment site or industrial estate in the countryside:

- Is at or close to full occupancy,
- Has a need arising from an existing business on the site and
- Can demonstrate that there no suitable alternative site is available in a nearby settlement with a boundary

Supporting expansion of existing businesses in the countryside through small scale employment development by extending the site, where

- It is evidenced that intensification of the existing site is not viable or practical
- Expansion is proportionate to the existing size and scale of site operations and will not harm local character, amenity or the landscape
- The site extension adjoins the existing employment site, creates a single operational unit, and does not create an additional point access from the road network; and
- The scheme prioritises reuse or adaptation of existing buildings to reduce the need for additional built development, with any new buildings to be well designed and a landscaping scheme to be implemented

Re-use of existing rural buildings

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

Justification for inclusion of policy

- 1.624. Employment needs to be available in the countryside to support rural communities, focused on existing sites, and small scale development. Policy 6 defines the countryside as the areas outside of the settlement boundaries, as defined on the Policies Map. This policy balances protection for the character and qualities of the countryside with promoting appropriate scale employment. There is separate policy on farm diversification and rural shops.
- 1.625. It is important for East Devon to develop its employment base and where established sites are successful, an intensification of employment uses or extension of an existing employment site can be considered if this supports additional employment accessible to local communities. This enables development to make use of existing sites and infrastructure. The scale of site intensification or extension is limited to **XX** per cent in the plan period, compared to the 2020 baseline (percentage to be justified).
- 1.626. Criteria will prioritise previously developed sites and those sites adjacent, or in close proximity, to a settlement to reduce the need to travel and increase settlement self-containment. Where sites are extended, need to ensure that development is sensitive to its surroundings, is of an appropriate type and scale and will not result in harm to local amenity. Where there is evidence of particularly high demand for employment development, we expect that any adverse aesthetic impacts stemming from that proposed development will be considered relative to the expected economic, social and environmental benefits stemming from that proposed development. Additional consideration will be given to existing East Devon employers, where the proposed development will safeguard valuable existing jobs.
- 1.627. Hill Barton and Greendale Business Parks are large, free-standing, historic employment areas within the countryside, not attached to or directly supporting the self-containment of any particular settlement. Accessing their locations for employment is primarily by motorised vehicles, with limited opportunity for more sustainable modes of transport. Development leading to intensification of use or site

extension is not supported as it could compound and exacerbate the adverse environmental and social impacts. This approach will however need to be kept under review if Members are minded to support the concept of a further new community and while options are assessed as some could see a new community developed close to these sites.

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52. Policy – Farm Diversification

Farm diversification will be supported through the introduction of new E(g), B2 and B8 employment uses onto established farm holdings. Where such uses would not be viable or would lead to adverse impacts then other uses, such as tourism, leisure, recreation, other employment uses may then be appropriate subject to this constituting sustainable development and ensuring the development supports the long term financial sustainability of the farm holding.

Criteria on what should be considered in the viability statement will be published and available online via the Council's website.

Proposals for farm diversification will be permitted providing they meet the following criteria:

- the proposal is compatible with, and an ancillary and subordinate component of, an existing and active farm enterprise and contributes to the continuing viability of the farm as a whole, retaining existing or providing new employment opportunities and services for the local community;
- the scale, siting and appearance of buildings and activities associated with the proposed development is appropriate to the rural character of the area and will not adversely impact local amenity
- development, in terms of its scale, nature, location and layout, does not detract from or prejudice the existing agricultural undertaking or its future operation;
- any existing suitable buildings are re-used or adapted and, where appropriate, redundant buildings which are derelict or offer no opportunity for beneficial use are removed;
- any new building (and parking and other structures/storage) is modest in scale, sited in or adjacent to an existing group of buildings, compatible design and blends into the landscape (design, siting and materials), enclosed with an appropriate boundary feature, taking into account the special characteristics of the farmstead and local area;
- no unacceptable adverse impacts arising from vehicle movements and where it is likely to create significant vehicular movements to and from the site it should be well located in relation to sustainable tier 1-4 settlements
- foul drainage facilities are adequate;
- no adverse impacts arising from increased noise, smells, or other form of pollution. It may be necessary, for example, to limit the scale of on-farm anaerobic digesters;
- no adverse impact on the character of surrounding natural or historic environment;
- no adverse impact on protected species and opportunities to improve biodiversity are maximised

Any adverse impacts stemming from employment development will be considered against any positive economic, environmental and social impacts gained from that development.

Justification for inclusion of policy

- 1.628. Agriculture underpins the District's rural economy and supports a considerable number of ancillary businesses. The agricultural industry and the rural economy in general have undergone considerable changes in recent years, remaining a very important sector for the East Devon economy. Agriculture not only provides direct jobs but also underpins many other economic activities in rural areas. Agriculture remains the major user of rural land in East Devon and the use that most influences the physical appearance and character of the countryside.
- 1.629. The Council recognises the importance and changing role of agriculture and the need for new employment in rural areas. Changes in agriculture have made diversification increasingly important for the economic viability of farm holdings.
- 1.630. NPPF doesn't define agricultural diversification. However, as well as alternative agricultural products, increasingly it involves diversification out of agriculture, into non-agricultural business within the holding. This adds business activities to traditional farming to develop new sources of income.
- 1.631. The main driver for diversification is to support farm income. Diversification offers additional income streams and adds variety to current business models. As well as making better use of a farm's physical resources and characteristics; by branching out successfully, farmers can secure the long-term health and prosperity of their farm and their income. This adds stability to a business in times of uncertainty and can also optimise assets and unlock entrepreneurial skills. Many farmers are having to find new and imaginative ways of diversifying their business in order to survive. More entrepreneurial strategies are helping farms face pressures when confronting a decline in core income or changes in the policy landscape. The change in farming, moving away from subsidies, and towards grants could stimulate the drive to add value to the farms' agricultural and forestry products, and tackling climate change. There is considerable potential synergy between a greener economy and farm diversification.
- 1.632. The preferred policy option focuses on development where the scale and type is appropriate to the existing business and the rural character of the area. The priority is for making use of available and suitable buildings on a holding. New buildings, where justified and acceptable, should be well integrated with the existing holding to help them harmonise with the surrounding environment.
- 1.633. The continued viability of farm holdings is important to the rural economy. Diversification proposals should therefore contribute effectively to the farm business and more generally to the rural economy while integrating new activities into the

environment and the rural scene. Development proposals need to avoid conflict with and be well integrated into existing farming operations of the farm or estate.

- 1.634. Diversification proposals should be seen within the context of the future business plan for the holding as a whole. Where proposals affect a significant part of the farm holding, information may be requested on its extent, and what is proposed for the remainder of the holding. This may include evidence that, after development, the holding will continue to operate viably.
- 1.635. There is a need to carefully consider the appropriateness of new uses, their impact upon the surrounding area, the implications of public access, and their relationship to continuing agricultural operations. The range of diversification proposals is varied. Initiatives aimed at 'adding value' to food and goods produced on farms through processing and packaging initiatives are encouraged. It can also include tourism accommodation and attractions, events and festivals, distilleries and breweries, farm shops/cafes and specialist outlets, education and training/experiences. New crops and renewable energy development are other avenues for income streams. Like many other businesses, these new types of diversification have been reshaping their offer to keep the business afloat during the pandemic. We expect other innovative activities and income streams to be conceived and trialled throughout the plan period. These contemporary approaches to diversification are consistent with Government planning policy and other policies towards farming and the countryside.
- 1.636. Exceptionally, residential conversion of a building may be part of a farm diversification project. The Council is mindful of the flexibility already provided through Permitted Development Use Class Q for the conversion of agricultural buildings to residential use.

53. Policy – Resisting the loss of Employment sites

Loss of employment sites to other uses will not usually be permitted. Employment sites are considered to be those currently in employment use, last used for employment and those which are allocated, permitted or conditioned for employment development.

Exceptionally, those sites in B2 and B8 uses will only be permitted for other types of employment use, if it can be demonstrated that:

- Development relates to ancillary services which will support an employment area by making it more sustainable, viable and/or attractive; or
- Development results in mixed use urban regeneration designed to maintain or increase net job opportunities through alternative employment uses, guided by master-planning; or
- The site is no longer viable for the current type of employment use but is viable for an alternative type of employment use, evidenced by a viability statement; or

- There is a lack of demand for the current type of employment use at the site, evidenced by a marketing statement showing that the site has been appropriately marketed; and that a suitable supply of available (actively marketed) comparable employment sites/land can be demonstrated within the local area, evidenced by a supply statement; and
- The alternative use is in accordance with or does not undermine the plan's overall Spatial Strategy.

Exceptionally, the use of employment sites for non-employment uses will be permitted if it can be demonstrated that:

- The site is no longer viable for any employment use but is viable for an alternative use, evidenced by a viability statement; or
- There is a lack of demand for any employment use at the site, evidenced by a marketing statement showing that the site has been appropriately marketed; and that a suitable supply of available (actively marketed) comparable employment sites can be demonstrated within the local area, evidenced by a supply statement; and
- The alternative use is in accordance with or does not undermine the plan's overall Spatial Strategy.

Criteria on what will be considered an adequate viability, marketing and supply statement will be published and available online via the Council's website.

If an alternative use is acceptable, then applicants will be required to demonstrate that they have endeavoured to incorporate an appropriate (in terms of scale and type) element of employment floor space as part of the new development

Justification for inclusion of policy

- 1.637. Land is a finite resource and land suitable for employment is a relatively scarce commodity. Competition for land from higher value uses can make delivering employment development very challenging, whether new build or for redevelopment. The plan therefore includes a policy aimed at retaining existing or proposed employment sites and land provided that they are available, suitable and achievable over the plan period. The EDNA and supporting analysis of employment sites will provide vital information in justifying the identification of existing and proposed employment sites in East Devon.
- 1.638. This policy focuses on protecting employment land in order to maintain sufficient supply of employment land, providing a range and choice of sites over the plan period.

- 1.639. Existing employment sites and proposed employment allocations in East Devon are nearly all in places where housing accommodates or is planned to accommodate much of the labour supply, and where future housing on new local plan allocations will be concentrated. This enables settlements to be more self-contained and better able to support local communities, as well as reducing the need to travel.
- 1.640. The EDNA will provide the evidence about the amount of need for employment land. Given the low level of brownfield sites available in East Devon, then the need for additional employment land is likely to be on greenfield sites. To avoid the risk of needing to identify even more sites to mitigate loss of employment land to other uses, it is essential that existing Employment Areas within the existing settlements are protected to maintain the quantity and enhance the quality of the employment capacity they provide. The plan will need to identify the Employment areas to be protected. They could be identified on the Policies Map and listed as an Appendix in the plan.
- 1.641. Some ancillary uses complement and support employment uses, so may be appropriate on the existing and planned Employment Areas.
- 1.642. As the economy transforms, not all existing Employment Areas will remain viable or suitable for new types of employment uses. Alternative uses of these sites may then be appropriate if there is no realistic prospect of the site being used for employment. Planning applications would need to provide proportionate evidence about viability for continued employment use and the alternative use being proposed. Alternatively, where a site is viable for employment use, there may be a lack of demand for employment uses. In this case planning applications would need to provide proportionate evidence about robust and effective site marketing for employment uses and an availability of similar sites and land in the local area. If an alternative use is appropriate then opportunities to include an element of employment provision should be considered.
- 1.643. This policy is consistent with the NPPF. The policy is part of the policies package for creating the conditions in which businesses can invest, expand and adapt. The plan places significant weight on the need to support sustainable and inclusive economic growth and to be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances.

54. Policy – Employment and Skills Statements

At this stage we are still gathering evidence to inform detailed policy wording. It is intended that the proposed policy will address the following issues:

- Requiring developments over a certain threshold to commit to maximising the provision of skills and employment opportunities, to benefit the local population as well as the employer
- Evidencing the commitment through a statement to be submitted with the planning application for development

54. Policy – Employment and Skills Statements

- Thresholds relating to this requirement - to be determined but could be applied to proposals of 100 houses or more, or employment development of 1000sqm or more
- Exceptionally, making a financial contribution in lieu of the employment and skills obligation (if circumstances justify it),
- Implementation of the commitment to be sought through a planning obligation
- Commitment to producing a Supplementary Planning Document to guide implementation of the policy

Justification for inclusion of policy

- 1.644. Development provides opportunities for employment and improving skills within East Devon, not just in from the building of the development but from the local supply chains, and the opportunity for apprenticeships and extended skills in the local labour supply.
- 1.645. As the economy transforms, development provides an opportunity to improve access to employment and to widen and raise skills in the local workforce. This policy supports the increase employment opportunities by
- helping local businesses to improve, grow and take on more staff
 - helping businesses to find suitable staff and suppliers, especially local ones
 - Improving the skills of local people to enable them to take advantage of the resulting employment opportunities
 - helping businesses already located in East Devon to grow and attract new businesses into the area
- 1.646. The workforce in East Devon shows a good level of education with a mix of academic and vocational skills. The proportion of the working age resident population with no qualifications in East Devon is low, compared to national levels. However, the proportion of the working age resident population qualified to NVQ level 4 and above in East Devon in 2018 was 35.8%, lower than the 38.7% in the South West and 39.3% nationally.
- 1.647. The Economic Vision and Economic Strategy support economic growth and prosperity in East Devon, but it also emphasises the need for growth to be inclusive, so that residents can access higher value employment opportunities. Raising skills in the District is part of a wider approach, aligned with the Levelling Up White Paper and Heart of the South West Local Industrial Strategy. The LIS supports a skilled workforce through the Skills Escalator to enable a skilled workforce fit for the opportunities of the future. This approach focuses on
- championing STEM courses (including T levels) to increase take-up
 - ensuring all residents have the employability skills they need to progress
 - increasing the take up of technical qualifications, and improving retention and recruitment of those with technical and higher-level skills
 - increasing employer investment in workforce development

- working with institutions to ensure that the Heart of the South West's learning facilities and teaching capacity are fit for purpose and meeting future need; and
- mainstreaming an inclusive approach so all residents can benefit from future prosperity.

- 1.648. This policy focuses on certain types of planning applications, for larger developments (where the size thresholds will need to be justified) committing the development to employment and skills provision. The pledges would relate to local labour, apprenticeships, workforce training and work experience, and local supply chain contracted in the construction process. The commitment is set out in an Employment and Skills Statement, submitted with the planning application. Once the statement is agreed with the LPA its implementation is controlled through a S106 Agreement.
- 1.649. An SPD is the appropriate way to provide detailed guidance to aid policy implementation. A mechanism to monitor whether the companies are honouring their commitment would be necessary. This means assessing whether the commitments are relevant, proportionate and measurable, and requiring the provision of data capturing the actions and results.

55. Policy – Town centre hierarchy, sequential approach and impact assessment

The tier one and two town centres will be the preferred location for the development of main town centre uses as defined in the NPPF. Proposals must be appropriate in terms of their scale and design to the centre in which they are proposed, as well as the function of the centre and accord with other policies in the plan.

The hierarchy of centres in East Devon is defined as follows:

- Tier one Town Centre: **Exmouth**
- Tier two Town Centre: Axminster, Cranbrook, Honiton, Ottery St Mary, Seaton, Sidmouth
- Tier three Local Centre: Broadclyst, **Budleigh Salterton, Colyton**, Lympstone, Woodbury
- Tier four Village Centre: Clyst St Mary, Uplyme, **Beer**, West Hill, Newton Poppleford, Feniton, Whimple, Kilminster, Otterton, East Budleigh, Stoke Canon, Tipton St John, Musbury, Sidbury, Chardstock, Broadhembury, Payhembury, Branscombe, Plymtree, Dunkeswell, Hawkchurch, Exton.

Settlements shown in bold text have defined Town Centre Areas to which town centre development policy will apply.

Applications for main town centre uses that are not proposed in the defined town centres and are not allocated for development through other policies of this Plan will only be permitted where the applicant can demonstrate that:

- The proposal accords with (satisfies) the sequential test as set out in the NPPF, and flexibility has been demonstrated on issues such as the format and scale of development.
- For retail proposals greater than 500sq.m, and other town centre use proposals greater than 2,500sq.m, an impact assessment has been undertaken, which shows that the proposal will not have a significant adverse impact in line with requirements set out in the NPPF, either alone or cumulatively. Neighbourhood Plans may set different thresholds where local considerations, supported by evidence, indicate this is appropriate.
- Retail development will not only be allowed on sites allocated for other uses if equally suitable alternative provision can be accommodated in the immediate locality.

Edge-of-centre¹⁸ and out-of-centre sites, which satisfy the sequential test, should be accessible by public transport, bicycle and foot and well-connected to the centre. In order to ensure that land is retained for the benefit of the local economy, permitted development rights allowing changes to alternative uses will be withdrawn.

Justification for inclusion of policy

1.650. East Devon's town and village centres provide more than just retail opportunities, they function as the heart of the community offering a wide range of facilities often including: leisure and entertainment; sport and recreation; offices; cultural spaces and tourism development. The vitality and viability of these centres is fundamental to the support that they provide for local communities in the settlement and in adjoining areas, who rely on those centres. The NPPF is clear that planning policies for town centres should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period.

¹⁸ Edge-of-centre locations are defined for retail purposes, as locations that are well connected and within 300 metres of the Primary Shopping Area. For all other main town centres uses, it is a location within 300 metres of a town centre boundary, however for office development this includes locations outside of the town centre but within 500 metres of a public transport interchange. Local circumstances should be taken into account when determining whether a site falls within the definition of edge-of-centre.

- 1.651. This is a strategic policy because it establishes the network and hierarchy of centres. Maintaining the vitality and viability of the town centres in East Devon is a strategic priority in the plan. This policy is also the starting point for the suite of non-strategic policies on town centres and primary shopping frontages, local shops and services, and rural shops.
- 1.652. The NPPF requires the LPA to define a network and hierarchy of centres that is resilient to anticipated future economic changes. This policy draws on the evidence in the Council's Role and Functions of Settlements Study produced by the Council in July 2021, which categorised the roles of existing settlements in the District by taking into account their differing sizes, offer, functions and accessibility by sustainable transport modes.

Town centre Hierarchy

- 1.653. East Devon contains a number of centres fulfilling residents and visitors diverse leisure and retail needs as part of a wider hierarchy. Village facilities will cater for basic everyday essentials but East Devon residents will use the main town centres to meet their convenience goods shopping needs and to access a wider range of services. None of the towns act as major comparison goods shopping destinations. In general, comparison goods expenditure flows out of the District, mainly towards Exeter but also to Taunton, Dorchester and further afield, as well as a significant and growing expenditure online.
- 1.654. Within the District the settlement hierarchy and centre type is as follows:
- **Tier one:** Exmouth (town centre with an extensive range of shops and services.)
 - **Tier two:** Axminster, Cranbrook, Honiton, Ottery St Mary, Seaton, Sidmouth (town centres with a wide range of shops and services)
 - **Tier three:** Broadclyst, Budleigh Salterton, Colyton, Lypstone, Woodbury (local centres with multiple shops and services)
 - **Tier four:** Clyst St Mary, Uplyme, Beer, West Hill, Newton Poppleford, Feniton, Whimble, Kilminster, Otterton, East Budleigh, Stoke Canon, Tipton St John, Musbury, Sidbury, Chardstock, Broadhembury, Payhembury, Branscombe, Plymtree, Dunkeswell, Hawkchurch, Exton, Westclyst (village centres with a limited range of individual shops and services)
- 1.655. As well as encouraging new shops and facilities in these locations it is important that existing provision is retained, especially in the tier three and four and more rural settlements where there are only likely to be one or two of each type of shop or service and total loss would be severely damaging. It should be noted that, in addition to the town centres, the towns may also have neighbourhood shopping parades and individual stores and facilities to serve the local communities on the outskirts. In policy terms, applications affecting these shops and facilities will be treated on the same basis as those in Tier four settlements as they are similarly important in meeting the basic everyday needs of residents. Outside of the settlements listed above, residents have few facilities so are forced to travel elsewhere, resulting in a less sustainable travel pattern. Focussing new development on locations with good access to community services and facilities

helps to reduce traffic congestion, reduce carbon dioxide emissions, improve air quality, and improve both physical and mental health.

Sequential Test

- 1.656. The Council must apply a sequential test to planning applications for new retail and retail related development, for example drive-through restaurants. The sequential approach will be applied so that development is located in the centre to which it is most appropriate, with preference being given to those centres higher up the hierarchy, and then identifies preferred locations which must be considered before out-of-centre sites. The first preference is for town centre locations (within the Town Centre Area, as identified on the Policies map), followed by edge-of-centre sites and only then by out-of-centre sites provided that they can be made accessible by a choice of means of transport and will not adversely impact upon nearby centres. It is however, recognised that existing out of town stores will continue to provide a form of retailing which both adds to local shopping choice and is popular with the public. Proposals for the refurbishment and redevelopment with small scale extensions of out of centre stores may be acceptable where there is insufficient net gain in retail floorspace to have an adverse effect on other established centres. Sequential testing is not required for small scale rural development (including office development) at or below 2,500 square metres of gross floorspace.
- 1.657. The NPPF also requires local plans to set a proportionate, locally set floorspace threshold above which planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan should be assessed for their impact. The scope of the Sequential Test and Retail Impact Assessment required to be submitted in support of a planning application should be discussed and agreed between the applicant and the Council at an early stage in the pre-application process. The level of detail included within the assessments must be proportionate to the scale and type of retail floorspace proposed and shall be determined on a case by case basis. The PPG sets out detailed requirements for carrying out such assessments.
- 1.658. In determining the scale at which retail impact assessments are required the Council have taken advice and established a threshold figure of 500 square meters above which assessment will be needed. For other types of development a default threshold of 2,500sq.m. (gross) is identified by the NPPF.

Town Centre Development

- 1.659. With the exception of Cranbrook, where the town centre is embryonic, the District's town centres are compact, have a retail offer that focuses on convenience and service provision, and are characterised by a predominance of independent shops fringed by supermarkets. Regular streetmarkets in Honiton and Axminster, and occasional farmers or artisan markets in all of the towns, draw in trade and along with street performers and other temporary events in the public realm create vibrancy and are to be encouraged. In addition to the town's identified in tier one and tier two, the smaller settlements of Budleigh Salterton, Beer and Colyton contain a

similar range of shops and other uses typically found in the larger towns, albeit at a smaller scale, and so Policy 56 will also be applicable to them.

56. Policy - Town Centre development

Town Centre Areas and Primary Shopping Areas are defined for the tier one and two towns (except Cranbrook) and the settlements of Budleigh Salterton, Beer and Colyton.

Proposals for development within the town centre areas, as defined on the Policies Map, will be permitted where they improve the quality and/or broaden the range of retail and leisure facilities, enhance the role of the town centres as sustainable shopping and leisure destinations and strengthen their vitality and viability. Proposals must not undermine the shopping character or visual amenity of the town centre, either alone or cumulatively, or adversely affect the amenity of the surrounding area through noise, smell, litter, traffic or disturbance arising from operating hours. Development proposals should make a positive contribution to the townscape of the centre in which it is proposed.

The Primary Shopping Areas as defined on the Policies Map will be the focus for retail and appropriate leisure uses. Development proposals for other town centre uses within the Primary Shopping Areas will only be permitted where the majority of the total ground floor units are facilitating retail or leisure uses. Unless it can be demonstrated that there is no longer a retail or leisure demand, other town centre uses will not be permitted on the ground floor within the Primary Shopping Areas. Unless it can be demonstrated that there is no demand for any town centre use, residential uses will not be permitted on the ground floor within the Primary Shopping Areas. Evidence of demand should be outlined in a marketing statement. Criteria on what will be considered an adequate marketing statement will be published and available online via the Council's website.

Where change of use of a shop is permitted within the town centre and the shopfront, entrance or other features are considered to be of architectural or historic merit they should be retained and incorporated into the new development scheme.

Throughout the Town Centre Area appropriately designed development proposals for residential or community use of upper floors will be encouraged. Such use should be independently accessed, have provision for refuse storage and should not result in adverse impacts on any retail use of the building.

Justification for inclusion of policy

- 1.660. In line with Paragraph 86 of the NPPF, the LPA supports the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. As part of a positive strategy for the future of each town centre, the Local Plan defines their extent and makes clear the range of uses that are acceptable within them.
- 1.661. **Primary shopping areas** are the defined areas where retail will be concentrated. The NPPF requires these to be identified on the policies map with the intention that retail use and access to convenience goods continue to draw in trade and maintain the vitality and viability of the High Street. The scale of the town centres covered by this policy is such that for each town centre, the Town Centre area and the Primary Shopping Area are one and the same. This means they share the same boundaries for the purpose of the local plan's town centre and retail policies. The Town Centre Areas are to be shown on the Policies Map.
- 1.662. **Historic environment of town centres** - The established town centres all contain listed buildings and designated conservation areas, so development proposals will need to be sensitively designed to protect, preserve and where appropriate enhance the character and appearance of any conservation area or listed building affected. Particular care should be given to the design of shopfronts, advertisements and signage. This also helps to create attractive, legible centres that encourage people to regularly use the centres and retain retail and leisure spend within East Devon.
- 1.663. **Town centre uses** - All of the town centres contain a mix of town centre uses including retail, leisure, community uses and residential housing, and benefit from public transport services (including rail services from Honiton, Axminster, Cranbrook and Exmouth) and bus services to the surrounding areas and to Exeter. The Local Plan provides a positive strategy for the future development of town centres and their health is regularly monitored to ensure that, if evidence suggests that they are in decline, the Council is able to implement further measures, along with relevant stakeholders, to support their vitality and viability.
- 1.664. Although all the established town centres have historically experienced low vacancy rates, they are some way from meeting their full potential as retail and leisure centres and would benefit from the development of an enhanced offer. To address this issue the Council has produced masterplans for Exmouth and Cranbrook, with the aim of regenerating the former and stimulating private sector interest in both.
- 1.665. Given their close proximity to transport networks and local shops and services, town centre and edge of centre sites may be particularly suited to locating specialist housing for different groups including older people.

Flexibility

- 1.666. Due to competition from on-line retailing and increased flexibilities in changes of use introduced via the General Permitted Development Order (GDPO), there is a risk that the number of retail units within the town centres will reduce. This policy

therefore seeks to retain as many retail units as necessary within the town centres to ensure they remain attractive destinations. The GPDO allows for change of use of retail units to various other uses. The amount of floorspace which can be changed under permitted development is restricted. Applicants are advised to consult the GPDO prior to submitting a planning application to check whether planning permission is required. For the avoidance of doubt, this policy only applies to proposals which would fall outside the permitted development regime.

57. Policy – Local shops and services

Provision of new shops or services

Proposals for shopping and service development (including Public Houses and Post Offices) will be supported in tier 3 and 4 settlements, villages and neighbourhood centres provided it enhances their retail or service role and is accessible by walking and by bicycle and will not result in excessive traffic generation. New shops should sell predominantly convenience goods, be of a scale to serve the local area without, alone or cumulatively, impacting on the vitality or viability of any nearby centre¹⁹.

The operation of the shop or service must not be detrimental to the amenity of neighbouring residents by reason of undue noise, smell or traffic.

Loss of existing local shops or services

Proposals which would result in a significant or total loss of shops, Post Offices, Public Houses or other services to the community will not be permitted except where the existing provision of a use of this nature is no longer viable and there is no market for the business as a going concern. This will apply to stand-alone facilities or services and to those operating within or as part of a different use.

A marketing statement is required to evidence that there is insufficient demand and no market for the shop or service to be sustained, including under community acquisition/operation or within, or as part of, a different use. Criteria on what will be considered an adequate marketing statement will be published and available online via the Council's website. Permission to change the use of a shop will be subject to the retention of the shopfront.

¹⁹ As a guide to the scale and location of shops in the smaller settlements, Use Class F.2 (of the 1st September 2020 General Permitted Development Order) relates to shops not more than 280sqm mostly selling essential goods, including food and at least 1km from another similar shop.

Justification for inclusion of policy

- 1.667. Throughout the District there are small groups of shops and services which are invaluable in meeting the basic, everyday needs of the communities they serve. These vary greatly- from the more comprehensive offer in the tier three and four town and village centres, to neighbourhood shops outside the urban centres of the towns, and village shops in the rural communities. The extent and diversity of provision makes it impractical to define neighbourhood or local centres on the Policies map (or provide specific measures that could be used to define them) but these are areas where a group of shops and facilities, typically supplying a range of everyday goods and services is located. There is some scope for improving the local centres and for the provision of new shops, post offices and services in those areas which lack retail facilities. The opening hours of shops and services within residential areas may be restricted to ensure that local amenity is safeguarded.
- 1.668. Given the importance of existing shops and services in providing for the essential day to day convenience shopping needs of the local community it is vital that they are retained wherever possible and are able to adapt to changing localised need. They offer important facilities in particular for the elderly and less mobile. Village public houses often provide a focus for community life and shops and post offices enable those without transport to remain living rurally by reducing reliance on the private car, especially as public transport is limited in these areas. The Council will seek to resist the loss of local shops and services where this would result in a significant or absolute loss of facilities to a community.
- 1.669. It is difficult to reinstate shops, in the same or other premises, when they have changed to other uses. It is not however, always possible to prevent their closure when it is uneconomic for their use to continue. Therefore proposals involving the loss of local shops or services will only be permitted where the District Council is satisfied that the existing use is no longer viable and there is no market for the business as a going private or voluntary sector concern. In order to demonstrate this, the Council will seek information regarding the marketing of the business and its accounts. The Council will seek to retain the shop front in circumstances where permission is granted to enable the premises to be reinstated as a shop should the future opportunity arise.
- 1.670. It is important that the community function and role of shops and services in creating sustainable places is recognised, both by supporting new ones and by resisting the loss of existing ones. This conforms to the guidance in paragraph 84 of the NPPF relating to the rural areas which requires “the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.” This policy takes a cautious approach towards the loss of important shops and services, to ensure that the needs of communities can continue to be met in the future, but allows for change of use when the viability or use of the shop or service to the local community can no longer be demonstrated. Proposals will have to provide evidence that the current use, or an alternative use of similar value to the local community, is not viable through relevant marketing information and viability studies.

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58. Policy – Rural shops

In order to support local rural businesses whilst protecting the viability of town centres and shops available to the local community, retail development in rural areas, outside villages, will be permitted only where it directly relates to an existing rural business (such as a farm or plant nursery), subject to:

- a) a minimum of 50% of the produce/products for sale being produced on the premises or holding, and;
- b) the majority of the remaining produce/products for sale being sourced and produced from within a 30 mile radius of the business; or
- c) there being an essential functional need or relationship between the production process or the products to be sold and the rural business location which demonstrably increases the overall sustainability of the business. (Examples could include a wood powered smokery located within a fuel producing coppice; equestrian equipment sold at a riding school).

and provided that:

1. The scale and type of retail shop proposed will not adversely affect easily accessible convenience shopping available to the local community.
2. The proposal does not harm the rural character of the surrounding natural or historic environment, or the amenities of the locality.
3. The local road network and access to the site can safely accommodate the extra traffic generated by the proposal.
4. The car parking will be proportionate to the scale of the development and the layout and siting will be sympathetic to the surroundings.
5. The scale and scope of any additional services will be restricted to ensure that they are ancillary to the main use.

Applications for extensions or additional facilities will be subject to a retail impact assessment to ensure that existing town centres and local shops are not adversely affected to an unacceptable degree.

Justification for inclusion of policy

- 1.671. Rural shops (including farm shops and plant nurseries) are defined as shops in which the majority of goods sold are produced on the premises. This is suggested as being defined as a minimum 50% to ensure that any shop is reasonably linked to the use of the land instead of forming a general retail outlet. Farm shops can provide a valuable local facility, an additional source of income for farms and can help sustain the rural economy. However, they should not become an alternative to shops which are better located and more accessible and convenient in town and village centres.
- 1.672. Without restrictions on size and the type of goods to be sold, rural shops, garden centres and nurseries can become large commercial enterprises, supplementing

locally made products sold on a small scale with general retail products without a local tie sold on an inappropriately larger scale, potentially drawing trade from local centres. This will be controlled to prevent the sale of general retail goods and additional services such as cafes will only be permitted where they are ancillary to the sale of goods or products produced on the property to which the shop or nursery relates. Rural shops, garden centres and nurseries may develop an urban appearance as they expand and the number and size of buildings increase, hard surfaced display areas are extended and additional car parking is required. Such developments would generally be harmful to the high quality East Devon landscape and would generate additional traffic which may not be safely accommodated on local roads. Any proposals for the provision of new farm shops, garden centres or nurseries or the expansion of existing enterprises must therefore ensure that such development does not adversely affect the valued character, qualities and assets of the surrounding natural or historic environment to an unacceptable degree.

- 1.673. In accordance with paragraph 84 of the NPPF, the Local Plan will promote retail development in rural areas where products are sourced or manufactured locally as this will allow diversification in agricultural businesses and promote local food production, supporting the rural economy. The criteria set out in the policy will aim to restrict the scale of development and origin of goods to be sold to reflect the countryside location and ensure that the vitality and viability of town centres in the District is not undermined in line with the Local Plan strategy. This ensures that town centres are the focus not only for retail but service trades, leisure facilities and other public amenities, serving more than just their immediate locality and their protection is important for those accessing services from the surrounding areas.

59. Policy – Sustainable Tourism

This policy seeks to ensure that the Council's strategic vision for tourism, that East Devon be the leading, year-round tourism destination in Devon, whose diverse ecosystem of outstanding natural environments, distinctive, high-quality businesses, towns and villages, all thrive and grow through a commitment to Net Zero, accessibility and collaboration, is supported.

Applications for the provision of high quality, sustainable and accessible appropriately located accommodation, visitor facilities and attractions will be supported and encouraged. In this Policy "visitor accommodation" means serviced tourist accommodation (Class C1 use) and un-serviced tourist accommodation, as well as ancillary staff buildings to support the provision of tourism services.

Proposal for new Tourist Attractions/Facilities or Accommodation

In line with the Council Plan's focus on 'green tourism' capitalising on the breadth of the natural environment and biodiversity within the area, the development of new permanent and temporary visitor accommodation and attractions will be permitted in locations where reliance on the private car is minimised, where there is evidence to show customer demand and a commitment to:

- Developing facilities of high quality;
- Working towards Net Zero; and
- Improving accessibility provision (accessibility in terms of providing suitable access to those with physical and non-physical impairments/disability)

In order to provide such evidence, applicants will be required to submit a Sustainable Tourism Statement outlining their commitment to the above criteria. Criteria on what should be addressed in the Sustainable Tourism Statement will be published and available online via the Council's website.

Within the protected landscapes designated as Areas of Outstanding Natural Beauty, Coastal Preservation Areas or Green Wedges and outside of the settlement boundaries, new buildings to provide overnight visitor accommodation will not usually be permitted, although temporary structures such as yurts, glamping pods, towing caravans and tents may be acceptable. In exceptional circumstances, if a new building is permitted it would need to be built to the highest passive/green building standards and clearly outline how impact on the natural environment will be minimised.

Any proposal for new tourist attractions, facilities or accommodation should meet the following criteria in full:

- the scale, siting, intensity and appearance of buildings and activities associated with the proposed development is appropriate to the character of the area and will not adversely impact local amenity;

- any existing suitable buildings are re-used or adapted and, where appropriate, redundant buildings which are derelict or offer no opportunity for beneficial use are removed. If existing buildings cannot be reused or adapted then this should be fully justified;
- no unacceptable adverse impacts arising from vehicle movements or parking and where it is likely to create significant vehicular movements to and from the site it should be well located in relation to sustainable tier 1-4 settlements and local public transport provision
- foul drainage facilities are adequate;
- no unacceptable adverse impacts arising from increased noise, smells, or other form of pollution
- no unacceptable adverse impact on the character of surrounding natural or historic environment;
- no adverse impact on protected species and opportunities to improve biodiversity are maximised

Tourism development in the countryside

- Outside settlement boundaries new development must positively contribute to the natural beauty, wildlife and cultural heritage of the District. Development will need to be closely associated with other attractions/established tourism uses, including the public rights of way network; or be a subordinate part of farm diversification schemes.
- Where visitor accommodation or attractions are to be located in the countryside, development must be located very close to the main dwelling from which it will be serviced/managed (e.g. as part of a farm diversification scheme) to avoid the need for a permanent new managers dwelling or multiple daily car journeys to manage the site. Criteria will address matters such as transport, amenity, bio-diversity net-gain, staff accommodation and landscaping.

Policy will support and encourage the development of a year-round visitor economy, while ensuring the facility remains for visitor use only.

Loss of Existing Visitor Accommodation

- The loss of visitor accommodation to other uses will only be permitted in exceptional circumstances. For example, converting holiday accommodation into low-cost staff accommodation (rented residential accommodation for local workforce), which will address recruitment challenges for the tourism sector.
- Where loss is proposed, applicants will need to demonstrate that the site/land is no longer viable for visitor accommodation, cannot be refurbished or redeveloped for visitor accommodation but is viable for an alternative type of employment use, evidenced by a viability statement. Criteria on what will be considered an adequate viability statement will be published and available online via the Council's website.

Justification for Policy

- 1.674. Tourism is a key part of East Devon's economy and it is important that visitors continue to be drawn by the unique environment and offered good quality accommodation and services to meet their needs and encourage longer stays. Policy aims to secure a high quality, sustainable tourism experience for the wide range of visitors to East Devon, and ensure that proposals benefit local communities and businesses, whilst conserving, enhancing and promoting the natural beauty, wildlife and cultural heritage of the District.
- 1.675. A significant proportion of visits are day trips from those living in the District or in the villages, towns and city surrounding East Devon. For those holidaying in the District, visitor accommodation takes a number of forms- from seaside hotels and bed and breakfasts, to farmhouse bedrooms and holiday lets, glamping and camping to caravan sites and holiday parks. The tourism sector is largely leisure driven but evidence is presently lacking as to the levels of demand for different types of accommodation.
- 1.676. While the Council supports growth in sustainable tourism, there are associated challenges for the environment and local communities. High numbers of visitors can put pressure on some locations or 'hot-spots', for example, by impacting on tranquillity, increasing traffic and parking congestion, or causing physical erosion. The Council will support proposals for sustainable attractions and recreational activities, which avoid undesirable impacts, and contribute to the conservation and enhancement of the natural environment whilst providing for the needs of users and bringing benefits to the local economy.
- 1.677. Landscape character and built form are central to the attractiveness of East Devon as a destination for visitors and therefore, in the first instance, proposals should retain and utilise existing buildings. If existing buildings are not available, or are causing harm to the special qualities, then proposals for any new buildings should be accompanied by justification and evidence that the proposals are sensitive to the site and its wider context. New buildings for visitor accommodation will not usually be permitted within the designated landscapes. Proposals for temporary, seasonal, accommodation, such as tents, towing caravans and movable glamping pods, may be permitted within the designated landscapes in accordance with policy. Favourable consideration will be given to the removal of existing buildings which produce net gains for landscape.
- 1.678. The Council will resist the loss of permanent visitor accommodation and applicants will be required to demonstrate that it is financially unviable, by providing evidence in accordance with the marketing requirements set out in on our website. The minimum marketing period required is 12 months but a longer marketing period may be required to cover more than one season or where the existing use is located in close proximity to established tourist attractions or the rights of way network. Redevelopment of visitor accommodation, visitor attraction, recreation facilities or

associated development which is currently resulting in harm to the special qualities of the District (for example the visually prominent static caravans within the Coastal Preservation Area) should, in the first instance, be redeveloped for other more suitable tourist or community uses.

- 1.679. The purpose of this policy is to foster the responsible and sustainable delivery of tourism and visitor recreation development in East Devon in line with the Council Plan aims to increase and support 'green tourism' capitalising on East Devon's natural environment. Proposals for visitor accommodation, attractions, recreational activities, environmental education and interpretation should provide opportunities for visitors to increase their awareness, enjoyment, and understanding of East Devon's natural environment. They should also foster guardianship of the special qualities, for example, by promoting and incorporating the District's natural beauty, wildlife, cultural and built heritage. There are many diverse and creative ways in which development proposals could address this, which should be tailored to the context of the proposals.
- 1.680. There is a fine balance to be reached between encouraging provision of accommodation to enable visitors to enjoy the coast and countryside and damaging the rural character due to a proliferation of new buildings, noise and additional car-based traffic. The high number of planning applications for conversions of existing rural holiday accommodation to other uses (particularly housing) due to a lack of demand/viability indicates that some sectors of the industry are at saturation point and that, rather than permitting new permanent buildings in the open countryside, policy should encourage the conversion of existing buildings to holiday accommodation and temporary, seasonal structures such as yurts and glamping pods
- 1.681. In line with Government guidance development proposals for visitor accommodation, attractions and recreation facilities should be located sustainably. Locating such tourism development within existing tier 1-4 settlements give most opportunity for access to sustainable transport and other facilities, helping to minimise use of the private car.
- 1.682. Given the nature of some tourism-related and recreational activities, a more rural location or proximity to a geographically specific feature, such as the coast or a river, may be required. Policy will seek to ensure that these are planned for appropriately and contribute positively to the natural environment, particularly within designated landscapes.
- 1.683. Every opportunity for sustainable travel should be utilised including access to the site and/or subsequent travel, for example bicycle hire provision, as part of visitor accommodation. This is to ensure that the proposals align with the Council's net-zero targets and do not harm the special qualities of the area.

60. Policy – Holiday Accommodation Parks in designated landscapes

Within the District's most sensitive landscape areas, including Areas of Outstanding Natural Beauty, Coastal Preservation Areas and Green Wedges, new caravan, chalet or other holiday parks will not be permitted.

Proposals for the extension of, or related and ancillary facilities on, existing sites will be permitted provided they meet the following criteria in full:

1. No additional permanent pitches or accommodation are to be provided.
2. The proposal relates sensitively in scale and siting to the surroundings and includes extensive landscaping and visual screening to mitigate against adverse impacts.
3. The proposal would not have an adverse impact on local character or the amenities of adjoining residents.
4. The proposal would not use the best and most versatile agricultural land.
5. The proposal will be provided with adequate services and utilities
6. Traffic generated by the proposal can be accommodated safely on the local highway network and safe highway access to the site can be achieved.
7. The proposal will be subject to the provisions of plan policy in terms of sustainable construction, on site renewable energy production and biodiversity new gain.
8. Any structures beyond the existing boundary of the site are temporary and any visual or other harm can be satisfactorily mitigated.

Justification for Policy

- 1.684. The majority of East Devon lies within one or more designated landscapes. Holiday accommodation parks, comprising static caravans, chalets and/or lodges and associated facilities, are a key feature within the tourism sector and the expansion of existing parks, and potential development of new parks will have a positive effect on the economy of East Devon. This should not, however, be to the detriment of the natural environment or local communities and so a policy is required to establish how applications will be determined. This is particularly important given the large scale, range of facilities, lengthy operational hours and prominent coastal locations of many existing parks and their detrimental impact on both the seascape and the landscape.
- 1.685. Outside designated landscapes, new or expanded parks for holiday accommodation purposes will be acceptable in principle, in accordance with the Sustainable Tourism policy.

- 1.686. Within the designated landscapes no new holiday parks comprising static caravan, chalet, lodge or other similarly (semi) permanent accommodation will be permitted. Existing parks will be encouraged to upgrade and improve their accommodation and other facilities where this will lessen their existing visual, environmental and amenity impact. Extensions to, and intensification of development within, existing sites will not be permitted unless this is to provide related, non-permanent ancillary facilities and any adverse impacts can be satisfactorily mitigated

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10. Designing beautiful and healthy spaces and buildings

Introduction

- 1.687. The design of spaces and buildings is fundamental to how we experience places, and the impact development has on the natural environment. The design of space has a direct impact on peoples' health, safety, security, inclusion, travel choices, cost of living, and general quality of life. Design can influence the impact development has on the environment through the method and quality of construction, integration with the context of the local area, and the extent to which spaces and buildings address both immediate and future demands of the climate emergency.
- 1.688. The National Planning Policy Framework (NPPF) makes clear that the creation of high quality places and buildings is a fundamental requirement of the planning and development process. It highlights that good design is a key aspect of sustainable development and helps make development acceptable to communities. Local Plan policy is intended to ensure well designed proposals come forward for approval in accordance with the NPPF and national design guidance, contained in the National Design Guide, National Model Design Code, and Guidance Notes for Design Codes.
- 1.689. The Local Plan includes site allocations to enable appropriate levels of development to meet housing targets set at the national level. The design of these strategic allocations is key to safeguarding the character and appearance of our valuable landscapes. It is particularly important that we focus our attention on the most sensitive sites including allocations within Areas of Outstanding Natural Beauty (AONB) or affecting a heritage asset. To address this requirement, and as steered by national guidance, design codes will be produced for a number of allocated sites, and for specific areas, to inform future proposals. Our policies, supported by design codes, will guide the decision making process to ensure that all new development is fit for purpose, being both resilient and well integrated into the natural, built and historic environment.
- 1.690. Whilst good design is often associated with the physical appearance or functionality of buildings, it is increasingly concerned with achieving more sustainable and energy efficient buildings. These aspects of design are considered in detail under the tackling climate change chapter. Every development provides an opportunity for good design and many of our policies contain a design element. For example:
- Ensuring climate change resilience;
 - Encouraging healthy and active lifestyles and travel patterns; and
 - Encourage green infrastructure, including green space and landscaping.

- 1.691. New development should create a high standard of amenity for existing and future users. The quality of a home is a determining factor in health outcomes and the need for accommodation which is of a suitable size and layout to meet the needs of the occupier/s is key to this. The Government's nationally described space standard²³ (NDSS) sets minimum standards for the size of new dwellings, based upon the number of bedrooms, storeys, and occupancy. The NDSS provide a common standard that local planning authorities may choose to adopt through local plan policies, subject to evidence of need and viability.
- 1.692. Evidence on the size of new dwellings being built in East Devon over recent years indicates that just 29% are meeting the NDSS in relation to gross internal floor area. Further assessment of a selection of new homes against bedroom area and widths suggested far fewer homes achieve the other requirements of the NDSS. There is a risk that these new dwellings are not providing a reasonable level of internal space to undertake typical day to day activities, with potential impacts including a lack of space to prepare and eat food, store possessions, socialise, study, work, relax, or adapt in case of changed circumstances. In applying the NDSS, it will be considered that every habitable room which does not function as the main living room, dining room or kitchen will be regarded as a bedroom. The impact of adopting the NDSS will be considered in the viability assessment that accompanies the East Devon Local Plan 2020-40, to demonstrate that the Plan can be delivered in a viable manner.

61. Policy – Design and Local Distinctiveness

In order to ensure that new development, including the refurbishment of existing buildings to include renewable energy, is of a high quality design and locally distinctive, a formal Design and Access Statement, should accompany applications setting out the design principles to be adopted. Proposals should clearly respond to local policy and guidance including Neighbourhood Plans, Village Plans, Design Guides, Design Briefs, and Design Codes, whether adopted as Supplementary Planning Documents or promoted through other means.

Proposals will only be permitted where they:

- i. Identify opportunities for design that minimises risks associated with climate change, including consideration of a fabric first approach, the use of appropriate materials, techniques, and technologies to reduce carbon emissions over the lifetime of the development.
- ii. Include measures to secure the management of waste in accordance with the waste hierarchy (reduce, reuse, recycle, recovery, disposal) during the construction and operational phases.

- iii. Ensure the appearance of buildings, including scale, massing, density, height, fenestration, and materials, relate well to their context.
- iv. Do not adversely affect:
 - The distinctive historic or architectural character of the area.
 - The urban form, in terms of significant street patterns, groups of buildings and open spaces.
 - Important landscape characteristics and prominent topographical features.
 - Trees and hedgerows worthy of retention.
 - The amenity of occupiers of adjoining residential properties.
 - The operation of existing uses outside of the proposed development.
 - The future amenity of occupants of proposed residential properties, with respect to access to open space; protection from noise and pollution; provision of adequate internal light; storage space for bins, bicycles, prams, and other uses.
- v. Provide biodiversity enhancement appropriate to the scale of development in accordance with Local Plan policy. Where possible, development proposals should include landscaping that prioritises habitat creation.
- vi. Meet nationally described space standards*.
- vii. Provide:
 - Secure and attractive layouts with safe and convenient access for the whole community, including disabled users.
 - Measures to create a safe environment for the community and reduce the potential for crime.
 - Necessary and appropriate street lighting and furniture and, subject to negotiation with developers, public art integral to the design.
 - Features that maintain good levels of daylight and sunlight into and between buildings to minimise the need for powered lighting.
 - Appropriate 'greening' measures relating to landscaping and planting, open space provision and permeability of hard surfaces.
- viii. Mitigate potential adverse impacts, such as noise, smell, dust, arising from developments, both during and after construction.

*.[Technical Housing Standards - www.gov.uk](https://www.gov.uk/technical-housing-standards)

Justification for inclusion of policy

- 1.693. Paragraphs 126 to 136 of the NPPF establish the mandate for planning authorities to create policy that facilitates the creation of high quality, beautiful and sustainable places and buildings. Paragraph 27 states ‘plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable’. The NPPF makes clear that in order to provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences.
- 1.694. This policy is an updated version of Policy D1 – Design and Local Distinctiveness of the adopted local plan, one of the policies most often quoted in decision notices and appeals. In addition to the design specific policy, the plan policies embed good design throughout the Local Plan.

62. Policy – Housing Density and Efficient Use of Land

Proposals for residential development will be permitted provided that the development optimises the density of the site in a manner that conserves or enhances the character of the area and makes efficient use of land.

We intend to set minimum density standards to support the efficient use of land. In addition, we intend to create design codes with specific density recommendations for key allocations, including those proposed for high housing numbers and sites in the most sensitive landscape areas. Further design codes may be produced to address more generic area specific design and density concerns. This work is dependent on the final selection of site allocations, to be informed by the outcomes of the consultation process.

Justification for inclusion of policy

- 1.695. Paragraphs 119 – 125 of the NPPF deal with making effective use of land and achieving appropriate densities. In order to meet our sustainability goals we need to ensure that we make efficient use of land and build at the maximum density that is compatible with the character of the surrounding area. Where there is an anticipated shortage of land for meeting identified housing needs, the NPPF (paragraph 125) advocates minimum density standards for town centres and other locations well served by public transport that significantly increase the average residential density of such areas. The NPPF also suggests that a range of densities could be set to reflect the accessibility of different areas. Further work is needed to provide evidence of what the minimum density standards should be.

Advertisements

- 1.696. The display of advertisements is controlled in a similar way to the need to apply for planning permission for some development, but under a separate legal system. It is appropriate to have a policy to guide decision makers on how to deal with applications for advertisement consent.

63. Policy – Display of Advertisements

Applications for the display of advertisements will be considered in terms of amenity and public safety, taking account of cumulative impacts. Advertisements should be:

- i. Appropriately positioned and scaled in relation to their context;
- ii. Safe in terms of highway safety;
- iii. Sympathetic to the character of the area;
- iv. Designed with colours and materials compatible with the building and area; and
- v. Where illuminated, the type and level of illumination should reflect the general level of lighting in the area.

Justification for inclusion of policy

- 1.697. The NPPF highlights that the character of an area can be undermined when advertisements are poorly sited and designed but should only be controlled in the interests of amenity and public safety, taking account of cumulative impacts (paragraph 136). The proposed policy will help to protect amenities and public safety.

11. Prioritising Sustainable travel and providing the transport and communications facilities we need

Introduction

- 1.698. East Devon is a largely rural district and travel patterns generally reflect this, with relatively low levels of walking, cycling and public transport; and higher levels of car ownership than the national average. Nevertheless, there is a difference between urban and rural areas in East Devon. There are many villages and hamlets with limited jobs and services, where a degree of car travel is a necessity; but there are also lots of urban areas that offer a range of jobs, facilities, and services, suitable for day-to-day life, which can be accessed using sustainable travel modes. The spatial strategy in chapter 3 reflects this distinction.
- 1.699. Exmouth, Honiton, Seaton and Ottery St Mary all have bespoke bus services that travel around these towns, and there are several high frequency bus routes linking East Devon settlements to Exeter. East Devon has many train stations for its size (nine in total), across two lines, and usage has increased significantly over the last 20 years. There are also some high quality active travel corridors, notably the Exe Estuary Trail and proposed Clyst Valley Trail.
- 1.700. Sustainable transport is defined as “any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport”.²⁰ Promoting sustainable transport in new development has multiple benefits – these include less traffic congestion, lower carbon dioxide emissions, better air quality, and improved physical and mental health. In addition, where sustainable travel is not prioritised, those without access to a car (including young people, older people, those with disabilities, low-income households) can suffer from social exclusion and difficulty in accessing jobs, shops, leisure, education and other activities.
- 1.701. It is important to note that, whilst electric cars help tackle climate change by lowering carbon dioxide emissions, they are far from zero carbon due to emissions arising from their construction, and they do not reduce congestion or address issues relating to social exclusion discussed above.

Walking, Cycling and Public transport

- 1.702. The spatial strategy in Chapter 3 focusses development on those places which are or can be made sustainable, through limiting the need to travel to jobs, facilities, shops, schools and leisure; and offering a genuine choice of transport modes. National policy makes clear that the Local Plan should identify and pursue

²⁰ NPPF Annex 2: [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/617353/nppf-annex-2.pdf)

opportunities to promote walking, cycling and public transport. Much Government guidance has been published in recent years on designing places to promote sustainable travel.²¹ More locally, Devon County Council's Cycling and Multi-Use Trail Network Strategy²² proposes strategic cycle network schemes from Cranbrook to Exeter (section in East Devon now delivered), Seaton to Colyton, and Feniton to Sidmouth.

- 1.703. Studies have shown that most people will choose to walk only if their destination is less than a mile away, with 800m being a typical distance.²³ Nevertheless, distance is just one of several factors to consider – others include topography, surveillance, directness, attractiveness of the environment, and the intended destination. Given the rural nature of much of East Devon, it is not realistic to require all new development to be within 800m of a range of uses, but this should be the aim at the larger settlements and within larger scale developments.
- 1.704. The idea of “20-minute neighbourhoods”²⁴ has been gaining momentum for several years. Interest in this idea has grown as the COVID-19 pandemic meant people spent more time locally working at home, using public open space, and walking and cycling.

²¹ For example, the National Design Guide [National design guide.pdf \(publishing.service.gov.uk\)](#); National Model Design Code [National Model Design Code - GOV.UK \(www.gov.uk\)](#); Cycle Infrastructure Design [Cycle Infrastructure Design \(publishing.service.gov.uk\)](#); Gear Change [Gear change: a bold vision for cycling and walking \(publishing.service.gov.uk\)](#); Active Design [Active Design | Sport England](#); Building for a Healthy Life [BFL-2020-Brochure.pdf \(designforhomes.org\)](#)

²² Cycling and Multi-use Trail Network Strategy, Devon County Council: [150316_Cycle & Multi Use Strategy_FINAL.docx \(sharepoint.com\)](#)

²³ Planning for Walking, CIHT, 2015: https://www.ciht.org.uk/media/4465/planning_for_walking_-_long_-_april_2015.pdf; National Design Guide: [National design guide.pdf \(publishing.service.gov.uk\)](#)

²⁴ Decarbonising Transport, Department for Transport, 2021: [Transport decarbonisation plan - GOV.UK \(www.gov.uk\)](#); 20-Minute Neighbourhoods, The Town and Country Planning Association, 2021: [The 20-minute neighbourhood | Town and Country Planning Association \(tcpa.org.uk\)](#)

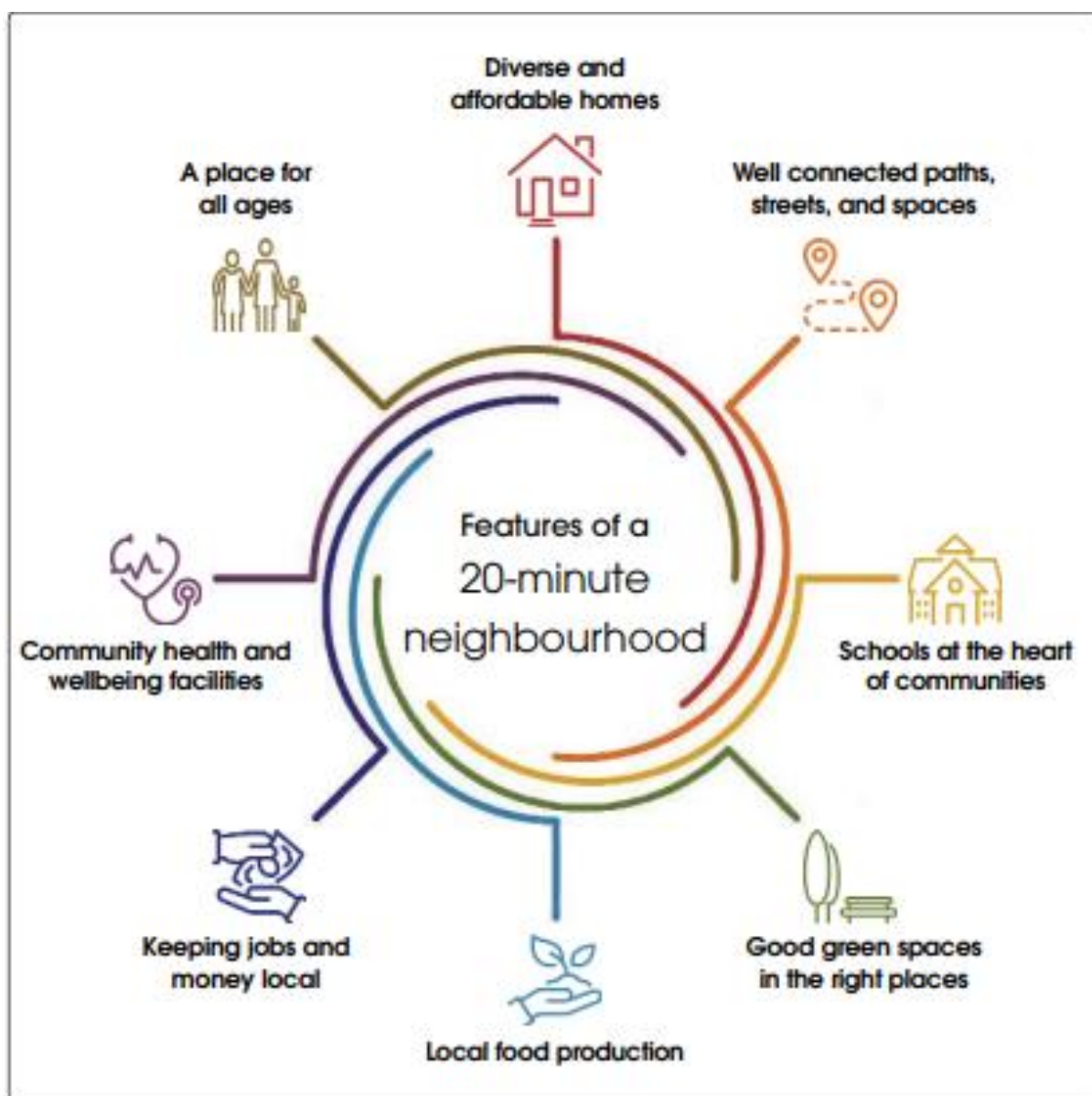


Figure 2: Features of 20-minute neighbourhood²⁵

1.705. The National Model Design Code makes clear that walking and cycling should be the first choice for short local journeys, particularly those of five miles or less. Indeed, figures show that 43% of journeys in the south west are under two miles – these shorter journeys offer the greatest potential for people to get out of their car and walk or cycle instead.²⁶ Securing access to high quality public transport from new development is another important way of promoting sustainable travel.

²⁵ 20-Minute Neighbourhoods, The Town and Country Planning Association, 2021: [The 20-minute neighbourhood | Town and Country Planning Association \(tcpa.org.uk\)](https://www.tcpa.org.uk/the-20-minute-neighbourhood)

²⁶ See: <https://www.gov.uk/government/statistical-data-sets/nts99-travel-by-region-and-area-type-of-residence#trip-length>

64. Policy – Walking, cycling, and public transport

New development should incorporate the features of a “20-minute neighbourhood” either within the site at larger scale development, or through links to features outside the site for smaller scale development.

Walking and cycling links should be prioritised in new development – such links should be coherent, direct, safe, comfortable and attractive. Cycle paths should be segregated from pedestrians to reduce the potential for conflict.

New development should facilitate access to high quality public transport through its location, layout, and, where necessary, contributions to public transport services and/or facilities (e.g., bus stops, bus priority measures).

It is recognised that opportunities to deliver this policy will be more challenging in rural areas compared to urban areas.

Protecting transport sites and routes

1.706. Where there is robust evidence, the Local Plan should identify and protect sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.²⁷ Such sites and routes could include park and ride/change sites, train stations and/or routes, bus priority measures, and walking/cycling routes. The focus will be on protecting sites and routes that promote sustainable travel, consistent with national policy, but there may also be a need to protect land for road schemes that realise opportunities for large scale development. Evidence²⁸ indicates protecting the sites/routes listed in the following policy, but we are seeking comments on this through public consultation.

²⁷ NPPF paragraph 106c: [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework)

²⁸ Cycling and Multi-use Trail Network Strategy, Devon County Council: [150316_Cycle & Multi Use Strategy_FINAL.docx \(sharepoint.com\)](#) ; West of England Study 2020 – Continuous Modular Strategic Planning, Network Rail: [West of England Study - Continuous Strategic Planning \(networkrail.co.uk\)](https://www.networkrail.co.uk/) ; Exeter Transport Strategy 2020-2030: [Exeter Transport Strategy 2020-2030 & InnovaSUMP - Roads and transport \(devon.gov.uk\)](#) ; Clyst Valley Regional Park Masterplan: [cvrp-masterplan.pdf \(eastdevon.gov.uk\)](#)

65. Policy – Protecting transport sites and routes

The following sites and routes will be protected from other development:

Strategic cycle network schemes:

- Seaton to Colyton
- Feniton to Sidmouth
- Clyst Valley Trail
- Sidford to Sidbury

Public transport:

- Railway passing loops as necessary at Axminster; Honiton; and Whimple to Cranbrook
- Bus priority route at A3052/A376 to M5 Junction 30
- Park and Ride areas of search at A30/Heavitree Road corridor; A376/A4052 Clyst St Mary corridor; and A377 Cowley Bridge Road corridor

Travel plans, Transport Statements and Transport Assessments

- 1.707. The spatial strategy and preferred policies that prioritise sustainable transport should limit the need to travel and offer a genuine choice of transport modes. Nevertheless, new development will still generate car travel, particularly given the rural nature of much of East Devon. Therefore, it is important to include policies to ensure that new development addresses the impacts of development on transport networks. For example, western parts of East Devon in particular experience congestion at peak times, including at M5 junctions 29 and 30, the A3052 corridor, and the A376 northwards from Exmouth, resulting in queuing and delay. Although outside of East Devon, the main road links in the eastern parts of Exeter suffer from congestion which affects those living and working in East Devon, particularly at peak times.
- 1.708. National policy states that all development that will generate significant amounts of movement should provide a travel plan and be supported by a transport statement or transport assessment so that the likely impacts of proposals can be assessed.²⁹ Travel plans are long-term management strategies for integrating proposals for sustainable travel into the planning process. Transport assessments are thorough assessments of the transport implications of development, whilst transport statements are a lighter-touch approach where there are limited transport impacts. “Significant” is not defined in national policy – our preferred policy approach is to set a threshold on when a transport statement or assessment and travel plan is required, to provide greater certainty. Alternatively, it may be more appropriate not to set a threshold to allow greater flexibility. We will gather evidence and consider public consultation responses before finalising this policy.

²⁹ NPPF paragraph 113: [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework)

66. Policy – Travel Plans, Transport Statements, Transport Assessments

The preferred approach is to include a policy that:

- Requires a Travel Plan at specified thresholds of residential and non-residential development. A Travel Plan will only be required if a Transport Assessment is needed.
- Requires a Transport Statement or Transport Assessment at specified thresholds of residential and non-residential development.
- Enables a Travel Plan, Transport Statement or Transport Assessment to be required below these thresholds, taking into account: the scale of the proposed development; availability of public transport; proximity to environmental designations; impact on promoting walking and cycling; cumulative impacts of multiple developments in the area; and whether there are particular types of impacts that require further evaluation.

Parking Standards

1.709. The NPPF sets out five issues to take into account if setting local parking standards:

- The accessibility of the development
- The type, mix and use of development
- The availability of and opportunities for public transport
- Local car ownership levels
- The need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

1.710. We are preparing evidence to cover these issues, which will inform parking standards. As previously highlighted, whilst there are many settlements which offer good access to jobs, facilities and services, overall East Devon is largely rural and car ownership levels are higher than the national average.

1.711. In order to promote cycling, new residential development should provide bicycle parking spaces.

1.712. In the UK, total emissions from surface transport in 2019 were more than one-fifth of the total UK Greenhouse Gas emissions. Cars and vans account for 77.9% of surface transport emissions.³⁰ In East Devon, total CO2 emissions from road transport in 2019 were more than one-third of East Devon total CO2 emissions.

1.713. The government announced its intention to end the sale of new petrol and diesel cars and vans in the UK from 2030, and with all vehicles being 100% zero emissions

³⁰ The Sixth Carbon Budget Surface Transport : [Sector-summary-Surface-transport.pdf \(theccc.org.uk\)](https://www.theccc.org.uk/publications/sixth-carbon-budget/surface-transport/)

from 2035. Thus, the numbers of Ultra Low Emission Vehicles and electric vehicles are expecting a significant increase in the next decade. EDDC will contribute to the reduction of emissions and support a low carbon future through smarter choices, including electric vehicle infrastructure.

67. Policy – Parking standards

Residential car parking standards

New residential developments will be required to provide parking provisions to an average of not less than 1.6 car parking spaces per dwelling and 2 cycle parking spaces per dwelling (rounded up to the nearest whole number in individual applications). In town centres where there is access to public car parks and/or on-street parking lower levels of parking and in exceptional cases where there are also very good public transport links, car parking spaces may not be deemed necessary.

Electric Vehicle Charging points

All new residential developments (for one or more new or replacement dwelling) will be required to provide Electric Vehicle (EV) Charging points, the EV charging points in accordance with the Building Regulations 2010 (Part S of Schedule 1) and any other relevant latest Government guidance.

Non-residential Parking Standard

At this stage, we are still gathering evidence to inform detailed non-residential parking standards and policy. The proposed policy will set the parking standard for different land use in East Devon.

Justification for inclusion of policy

- 1.714. The methodology for calculating the provision is based on guidance set out in Department for Communities and Local Government (DCLG) Residential Car Parking Research (May 2007) and East Devon car ownership data from the census 2011. The calculation has considered the local car ownership and the visitor space needs. The result shows a minimum standard of 1.6 parking spaces. For example, a development of 100 dwellings, 160 parking spaces should be provided. In town centres where there is access to public car parks and/or on-street parking lower levels of parking and in exceptional cases where there are also very good public transport links, car parking spaces may not be deemed necessary.

Number of cars or vans per household in East Devon	Percentage breakdown of total car ownership	Additional demand required if one space allocated	Total allocation (1 allocated space + additional demand + 0.1 visitor spaces)
No cars or vans in household	15.93%	0	
1 car or van in household	45.08%	0	
2 cars or vans in household	29.36%	0.2936	
3 cars or vans in household	6.91%	0.1381	
4 or more cars or vans in household	2.73%	0.0820	
Total		0.5137	1.6137

Table 1 Residential car-parking standard

Other transport issues

1.715. The NPPF also states that planning policies should provide for any large-scale transport facilities that need to be located in the area; and recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages. At the current time, there is a lack of evidence of these being particular issues in East Devon that should be addressed in the Local Plan, but we keep this under review as further evidence comes forward and invite comments through public consultation to consider these points.

Communications

1.716. The NPPF supports high-quality communication, as it is an essential element for economic growth and social well-being and society is more reliant on the internet since the COVID-19 pandemic, as it changed people's living and working style.

Digital Connectivity

1.717. East Devon faces challenges in delivering communications infrastructure in a rural area. East Devon is part of the Connecting Devon and Somerset (CDS) programme. CDS comes under the Government's Superfast Broadband Programme to deliver next-generation broadband infrastructure to areas where the commercial market has failed to invest.

- 1.718. According to Ofcom, in 2021 89.5%³¹ of the addresses in East Devon have super-fast broadband coverage and 35.7%³² have ultra-fast broadband coverage, in comparison the mean for all English district local authorities are 94.55% and 48.02%.
- 1.719. East Devon District Council would support further digital connectivity and high-quality communications improvements in the district by liaising with delivery partners and operators in the area and supporting the community engagement of their programmes.

68. Strategic policy – Digital Connectivity

Planning permission for new development (size thresholds and development types at and which policy will apply need to be established) will not be granted unless the scheme will have access to superfast broadband and high-quality communications. Superfast broadband is looked upon as the fifth utility and is identified as an essential requirement.

All new ducting to serve new developments must be installed with capacity for more than one provider and other provisions to enable the delivery of multi-operator fibre to the premises and sufficient mobile connectivity.

Developers are encouraged to have early discussions with strategic providers or Connecting Devon and Cornwall for major development and continuing to support the expansion of full-fibre broadband connections in the district.

Justification for inclusion of policy

- 1.720. Paragraph 114 of the NPPF, planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.
- 1.721. The Government launched a technical consultation seeking views on legislative proposals to ensure that new build homes have access to gigabit-capable connections. The consultation has closed for response in February 2022, and currently analysing the feedback. The policy should reflect the latest Government guidance.

³¹ [Percentage of addresses with Superfast broadband availability in East Devon | LG Inform \(local.gov.uk\)](#)

³² [Percentage of addresses with Ultrafast broadband availability in East Devon | LG Inform \(local.gov.uk\)](#)

12. Caring for our outstanding landscape

1.722. East Devon has a beautiful natural environment, which makes the District an attractive place to live and work. This environment also attracts visitors who contribute to the local economy.

69. Policy – Landscape Features

East Devon's landscape, countryside and rural areas will be protected against harmful development. Development will only be permitted where the applicant is able to demonstrate that it will protect and enhance features that contribute to the nature and quality of East Devon's landscapes, in particular:

- trees (including individual trees, groups of trees and woodlands), hedgerows and field boundaries;
- irreplaceable habitats such as ancient woodland and aged or veteran trees found outside ancient woodland;
- best and most versatile agricultural land;
- rivers, tributaries and flood plains;
- other watercourses and water bodies;
- seascapes and coastline;
- the landscape setting of settlements;
- topographical features;
- areas or features of cultural and historic value;
- important views and visually sensitive skylines;
- dark skies; and
- aesthetic and perceptual factors such as tranquillity, wildness, intactness, rarity and enclosure.

The Council will seek the retention of important hedgerows. Where retention is not possible and a proposal seeks the removal of a hedgerow, the Council will require compensatory planting with a mixture of native hedgerow species.

Justification for inclusion of policy

1.723. This overarching policy aims to protect important features in the landscape, whether designated or not. The landscape of the District includes deep valleys, wooded hills, ancient woodlands, historic parkland, low-lying farmland, riverside meadows and a variety of urban forms. The whole of East Devon is rich in biodiversity, including international, national and locally protected sites and habitats and forms a part of a wider ecological network across the County. Maintaining sustainable agricultural land and practices is important in preserving the district's rural character and landscape.

- 1.724. Proposals should be accompanied by a Landscape Appraisal, which should be proportionate to the size and likely impacts of the scheme. Landscape Appraisals should be carried out in accordance with the Guidelines for Landscape and Visual Impact Assessment³³ and successor documents. If the proposals require a full Environmental Impact Assessment (EIA) then a Landscape and Visual Impact Assessment (LVIA) undertaken by a Chartered Landscape Architect will be required.

70. Policy - Areas of Outstanding Natural Beauty

The highest level of protection will be given to the landscape and scenic beauty of the Areas of Outstanding Natural Beauty (AONBs) in East Devon:

- Development in an AONB or affecting the setting of an AONB will only be permitted where it conserves, and where possible, enhances the character and natural beauty of the AONB;
- Development in an AONB will only be permitted where it is appropriate to the economic and environmental wellbeing of the area or promotes understanding or enjoyment of the AONB;
- Major development in an AONB will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest; and
- Development proposals that could affect the special qualities of an AONB (including the setting of an AONB) either individually or in combination with other developments, should be accompanied by a proportionate Landscape and Visual Impact Assessment.

AONB Management Plans will be a material consideration in decision making.

Justification for inclusion of policy

- 1.725. Areas of Outstanding Natural Beauty account for around two thirds of the District and cover a number of villages as well as the small town of Budleigh Salterton. There are two AONBs in East Devon, the East Devon AONB occupies much of the south of the District, and the Blackdown Hills AONB (which although mostly in East Devon also extends into neighbouring mid Devon and Somerset) covering much of the north of the District. It should be noted that a very tiny part of the Dorset AONB extends into the extreme east of the District. These areas have the highest level of landscape protection in England, equal to that of National Parks and are designated by the Secretary of State, so the boundaries and statutory protection cannot be amended through the local plan process.

³³ Guidelines for Landscape and Visual Impact Assessment 3rd Edition (Landscape Institute & IEEMA, 2013)

- 1.726. Policy is required to ensure that the District's AONBs are protected and conserved in accordance with the Countryside and Rights of Way Act 2000 (CROW Act) and the NPPF.

71. Policy - Coastal Preservation Areas

Land around the coast and estuaries of East Devon, as identified on the Policies Map, is designated as a Coastal Preservation Area. Development or any change of use will not be allowed if it would damage the undeveloped/open status of the designated area or where visually connected to any adjoining areas. The coastal Preservation Area is defined on the basis of visual openness and views to and from the sea. Appropriate proposals which increase public access to the coast will be supported.

- 1.727. The Coastal Preservation Area boundary is currently under review to take account of development and other changes which have occurred since the boundary was defined in the adopted Local Plan. This will ensure that it continues to be based on visual openness and views to and from the sea. As this work is not yet complete the Proposals Map shows the currently adopted CPA boundary but this may change.

Justification for inclusion of policy

- 1.728. The majority of the coastline of East Devon is inscribed by UNESCO as being of international importance, recognised by its status as part of the Jurassic Coast World Heritage Site. Whilst the WHS was chosen for the outstanding value of its rocks, fossils and landforms the wider setting of the cliffs contribute significantly to the landscape (which is, itself, part of the landform). The NPPF (para. 174 c) requires local authorities to "maintain the character of the undeveloped coast, while improving public access to it where appropriate". Policy in the plan protects the character of the undeveloped coast (including the WHS) and designates a Coastal Preservation Area. This local designation is based on a detailed character assessment of undeveloped coast in terms of openness and views to and from the sea. (Note- the boundary of the CPA is currently under review)

72. Policy – Areas of Strategic Visual Importance

Development proposals will only be permitted where they preserve the visual integrity, identity and scenic quality of the District, in particular by conserving and enhancing key views and views of local landmarks.

The following view types are considered to be particularly important:

- Landmark views to and from viewpoints and tourism and recreational destinations, including the coast, woodland and open countryside;
- Views from publicly accessible areas which are within, to and from settlements which contribute to the viewers' enjoyment of the local area;
- Views from public rights of way and other publicly accessible areas;
- Night-time views of dark skies, particularly where lighting is to be introduced in areas of low existing light pollution; and
- Views which include or otherwise relate to specific features relevant to East Devon and its special qualities, such as key landmarks, heritage assets (either in view or the view from) and biodiversity features.

Development proposals should conserve and enhance sequential views, and not result in adverse cumulative impacts within views.

Justification for inclusion of policy

1.729. The purpose of the policy is to ensure that development does not harm important views or landmarks, to encourage conservation and enhancement of key view types and patterns, and to ensure development does not detract from the visual integrity, identity and scenic quality that are characteristic of much of East Devon. Appropriate site based assessment should be undertaken in accordance with the Landscape Institute & Institute of Environmental Managements most up to date guidelines for Landscape and Visual Impact Assessment³⁴. A LVIA should be carried out in accordance with these guidelines, and should be proportionate to the size and likely impacts of the scheme. If the applicant can demonstrate to the satisfaction of the local planning authority that an LVIA is not required, a simple landscape assessment may be appropriate.

1.730. There are many sources of information which may inform the Assessment including The East Devon and Blackdown Hills Landscape Character Assessment (2019)³⁵, What Makes a View (2013)³⁶, the Devon historic environment record³⁷, Village Design Statements, Conservation Area Character Appraisals and Management Plans, Local Landscape Character Assessments and Neighbourhood Plans may provide evidence on views and should inform development proposals. This information, together with essential field and desktop studies which are undertaken

³⁴ Guidelines for Landscape and Visual Impact Assessment 3rd Edition (Landscape Institute & IEMA, 2013)

³⁵ [Cover front.indd \(eastdevon.gov.uk\)](https://www.eastdevon.gov.uk/Cover%20front.indd)

³⁶ [what-makes-a-view.pdf \(blackdownhillsaonb.org.uk\)](https://www.blackdownhillsaonb.org.uk/what-makes-a-view.pdf)

³⁷ www.devon.gov.uk/historicenvironment/the-devon-historic-environment-record/

at an appropriate level to the application, should be provided at the earliest possible stage in the planning application process and would form part of LVIA.

73. Policy – Green wedges

Within Green Wedges, as defined on the Proposals Map, development will not be permitted if it would conflict with the purposes of the Green Wedges, which are to:

- i. prevent the coalescence of settlements and maintain a sense of place and identity for neighbourhoods
- ii. maintain the open character of a green lung contributing to health and wellbeing for residents and visitors
- iii. provide accessible formal and informal recreation, sport and play space
- iv. provide valuable wildlife corridors and habitat
- v. protect areas of landscape importance and visual amenity

Within the Green Wedges permission will only be granted for development where:

- i. it cannot be located elsewhere; and
- ii. it would not compromise, individually or cumulatively with other existing or proposed development, the integrity of the green wedge, either by diminishing its physical extent or through visual intrusion.

Community, open sports, play and recreational uses will be supported in principle. If granted, any associated built development must be kept to a minimum, essential, small in scale and be necessary to support the main use. It should also be well related to adjacent built form and sensitively located to retain openness of the area.

Proposals for policy compliant development that include measures that will create or enhance wildlife habitats and biodiversity within the Green Wedges, or will improve the quality of the Green Wedges by providing high quality public amenity space will be supported.

1.731. The Green Wedge locations and boundaries are currently under review to take account of development and other changes which have occurred since the boundaries were defined in the adopted Local Plan. The review will ensure that the identities of settlements at risk of physical or visual coalescence are suitably protected and ensure that Green Wedges are not so excessive as to unnecessarily restrict development that would otherwise be acceptable. As this work is not yet complete the Proposals Map shows the currently adopted Green Wedge boundaries but this may change.

Justification for inclusion of policy

- 1.732. Green wedges are a long-standing local landscape designation that recognises the importance of maintaining open green networks between settlements in close proximity, for wildlife, flood storage capacity, leisure and recreation and preventing settlement coalescence in order to maintain a sense of place and identity for local communities. New buildings within the Green Wedge will be restricted to ensure that the openness, role and function of these landscapes are not adversely affected. There are a number of functions, supported by the NPPF, which they can fulfil:
- Preventing the coalescence or merging of settlements and preserving the separate identity and character of settlements;
 - Providing a green lung into urban areas;
 - A recreational resource;
 - Protecting and enhancing ecological value and linkages;
 - Flood storage capacity.
- 1.733. Green wedges are identified on the policies map (note- this map shows current green wedges, they are under review).
- 1.734. Proposals for new buildings will be assessed to ensure that they are proportionate in size and scale in relation to their intended use; in most circumstances, including proposals for new agricultural buildings, evidence may be required to demonstrate the requirement for a building of the size proposed.
- 1.735. Essential infrastructure, such as sewage or water connections, power sources, waste water recycling/treatment sites, electricity substations, emergency services or telecommunications will be permitted within the green wedge provided it must be situated in the location proposed for connection purposes and the benefits will override the impact on the designation. Local transport infrastructure is defined as being infrastructure that must be situated in the location proposed such as a Park and Ride facility, new roads and bridges.
- 1.736. Buildings for outdoor sport and recreation will include stabling for horses. Cemeteries, with ancillary buildings, and allotments are also acceptable in principle. The size and scale of these types of development will be judged on a site-by-site basis in relation to their intended use. The Council also recognises that there can sometimes be a need for outbuildings within residential properties because the size or location of the building falls outside of the remit of permitted development. These types of buildings may be used for purposes incidental to the enjoyment of the dwelling house; it is not intended for the policy to provide new planning units or non-domestic uses within a residential site in the Green Wedge.
- 1.737. The Council supports, in principle, the provision of new buildings for community use including educational facilities that can demonstrate a requirement for a Green Wedge location. This is likely to be due to the location of the community or facility in which it serves.

- 1.738. Economic growth in the Green Wedge, and the re-use of existing buildings for employment purposes is encouraged but new buildings will only be permitted in circumstances where the proposal supports the sustainable growth and expansion of an existing, authorised and viable rural business. The need for the building and its Green Wedge location should be justified. New buildings for start-up businesses will not be permitted in the Green Wedge in order to avoid the proliferation of new buildings which are unconnected to existing sites and uses and may result in harm to the openness and landscape character.
- 1.739. Redevelopment of previously developed land, or replacement of lawful existing buildings, will be permitted where the development would not have a greater impact on the characteristics and attractiveness of the landscape and the purpose of including land within the Green Wedge than the existing development and also represents sustainable development. To avoid the replacement of shacks, caravans, sheds or other structures which, through the passage of time have blended into the landscape buildings must be of permanent and substantial construction.

74. Policy – Land of Local Amenity Importance or Local Green Space

This policy will apply to Local Green Spaces, designated through Neighbourhood Development Plans or SPD (and identified on maps in those documents), and to the Land of Local Amenity Importance areas (as shown on the Policies Map).

Within the Local Green Space or Land of Local Amenity Importance areas, development will be restricted to those limited types of appropriate development set out below, unless very special circumstances can be demonstrated.

Appropriate development, compatible with the reasons for which the land was designated, is considered to be:

- i. provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, provided they do not conflict with the purpose of the LGS/LLAI designation;
- ii. the extension or alteration of a building provided that it does not result in a disproportionate addition over and above the size of the original building;
- iii. the replacement of a building, provided the new building is in the same (or a preferable, community) use and not materially larger than the one it replaces.

All development proposals should be carefully designed and managed to minimise visual impact, respect the reasons for which the site was designated, and ensure the continued integrity of the site.

Development proposals outside LLAI or LGS, but conspicuous when viewed from it, should minimise any detrimental impacts to the visual amenity and respect reasons for which the site was designated. Development proposals which improve accessibility to, or enhance the use of LLAI/LGS will be supported.

Justification for inclusion of policy

- 1.740. The policies in this plan provide important protection to the natural environment within East Devon and are likely to help preserve the character and integrity of important green areas within and around the District. However, there is potential for development pressure to erode and impact upon smaller green areas which are particularly important to local communities. This policy seeks to give added protection against development to locally valued green areas or open spaces.
- 1.741. The Land of Local Amenity Importance designation will convey protection separate to (and in some cases in addition to) the Local Green Space designation which some East Devon communities have identified through Neighbourhood Plans.
- 1.742. Land of Local Amenity Importance is highly valued by local communities. The Local Plan recognises the particular visual, and other, importance of 14 sites within 5 of the District's towns and restricts development that is not for a community purpose or that would undermine the open character of the area. The sites are deemed to be locally significant, with opportunities of enhancement to provide multiple benefits, including improved water quality, access, biodiversity, recreational, health and educational benefits.
- 1.743. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. As outlined in national policy, Local Green Space designation should only be used where the green space is in reasonably close proximity to the community it serves; Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of wildlife; and local in character and is not an extensive tract of land.
- 1.744. As additional Local Green Spaces may be identified during the life of the Local Plan it is not possible to identify these areas on the Proposals Map, but the policy will apply to LGS in made Neighbourhood Plans and SPD.
- 1.745. Development within, or in close proximity to the Local Green Space or Land of Local Amenity Importance, should respect reasons for which the site was designed and minimise any impacts on it.

13. Protecting and enhancing our outstanding biodiversity and geodiversity

- 1.746. East Devon benefits from an exceptional abundance of biodiversity and geodiversity interest. From our Internationally Designated Sites to our extensive network of priority habitats and protected species, East Devon recognise the value of these resources for nature conservation, health and wellbeing, education, climate change mitigation, flood risk management, air and water purification and the economy.
- 1.747. Our biodiversity and geodiversity is intrinsically linked to and often threatened by a range of factors, including climate change, agriculture, pollution, land use change, urbanisation and increasing human populations. These impacts can arise through complex direct and indirect mechanisms.
- 1.748. The value and importance of wildlife and the natural world is increasingly recognised by Government, as evidenced by the Environment Act 2021, which itself followed on from the Government paper 'A Green Future: Our 25 Year Plan to Improve the Environment' – see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

Biodiversity value and importance

- 1.749. The policies of this new local plan seek to protect existing features of biodiversity value, increase protection of biodiversity features, enhance and expand existing features of biodiversity value, improve the quality and accuracy of ecological information submitted for assessment, and improve avoidance, mitigation and compensation outcomes resulting from permissions.

Protection of wildlife sites

- 1.750. Many sites are protected on account of their intrinsic importance and value for the wildlife they support. At the highest level sites can be national designated and there is considerable legal protection that is afforded to them, though such protection is expanded on and further articulated through planning policy. There are, however also local sites that are afforded wildlife protection.

75. Policy – Protection of Internationally and Nationally important wildlife sites

Protection of Internationally and Nationally important wildlife sites

Proposals and plans that would cause a direct or indirect adverse effect upon internationally and nationally designated sites will not be permitted unless all of the following criteria are met:

- i. They cannot be located on alternative sites that would cause less or no harm.
- ii. The public benefits of the proposal clearly outweigh the impacts on the features of the site and the wider network of natural habitats and designated sites.
- iii. Suitable avoidance, mitigation and compensation measures are proposed, in accordance with the mitigation hierarchy.
- iv. Where permanent or long-term temporary habitat loss or direct reduction of habitat condition is identified, suitable biodiversity net gain of at least 20% is proposed, which should be ecologically relevant and connected to the site affected as to not result in a net reduction of the condition of the site.
- v. In respect of internationally designated sites, the integrity of the site will be maintained.

Sites falling under this aspect of policy include:

- Special Areas of Conservation (SAC)
- Special Protection Areas (SPA)
- Proposed SACs
- Potential SPAs
- Ramsar sites
- Areas secured as compensation for damage to an internationally or nationally designated site
- Sites of Special Scientific Interest (SSSI)
- Marine Conservation Zones (MCZ)
- National Nature Reserves (NNR)

It should be noted that there is also specific policy, where applicable, in this plan in respect of Habitats Regulation Assessment requirements.

Protection of Regionally and Locally important wildlife sites and features

Development proposals that would cause a direct or indirect adverse effect upon Regionally and Locally important wildlife sites and features will not be supported unless all of the following criteria are met:

- i. They cannot be located on alternative sites that would cause less or no harm.
- ii. The public benefits of the proposal clearly outweigh the impacts on the features of the site and the wider network of natural habitats and designated sites.
- iii. Suitable avoidance, mitigation and compensation measures are proposed, in accordance with the mitigation hierarchy. Destruction of habitats of principle importance should be avoided as fully as possible. When destruction of these habitats is proposed, proof of

there being no satisfactory alternative should be provided. Suitable mitigation and compensation measures should then be identified.

- iv. Where permanent or long-term temporary habitat loss or direct reduction of habitat condition is identified, suitable biodiversity net gain of at least 20% is proposed.

Such sites include:

- Local Nature Reserves (LNR)
- County Wildlife Sites (CWS)
- Special verges
- Habitats of Principle Importance, as listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (identified through site survey work or as identified through existing mapped resources)

Justification for inclusion of policy

- 1.751. Statutory designated wildlife sites (those of international and national importance) benefit from substantial protection under national legislation. This local plan policy does not seek to duplicate existing protections, but does provide clarification as to existing legislation and government guidance, and seeks to add detail on when impacts may be permitted, expectation of enhancement of biodiversity interest, and an indication of which designations are included within the policy scope.
- 1.752. A more specific Habitats Regulations Assessment (HRA) policy is included in this chapter detailing requirements for HRA and existing East Devon mitigation strategies relating to impacts on European sites.
- 1.753. Non-statutory sites (those of regional and local importance) benefit from little protection under national legislation, and typically rely on local planning policy and the NPPF for protection. The council recognizes the biodiversity value and strategic importance of locally designated sites of ecological importance, as well as and priority habitats. These features and areas are ecologically important, are often irreplaceable, and will play a major part in ecosystem resilience and nature recovery in coming years. The value is recognized of these often-fragmented habitats within the current biodiversity crisis, and seeks to afford these features with a high level of policy protection and consideration within the planning process. This local plan policy provides clarification as to when impacts may be permitted, expectation of enhancement of biodiversity interest, and an indication of which designations are included within the policy scope.

Irreplaceable habitats and important features

- 1.754. Whilst many sites are designated for the species and habitats the support there are also areas and features that are not specific designated and have not necessarily

been surveyed and assessed but none the less are of great importance to wildlife interest. Of particular importance and value are trees and hedgerows and plan policy seeks to afford specific protection to these assets.

76. Policy – Protection of irreplaceable habitats and important features

Ancient Woodland, Veteran Trees, and other irreplaceable habitats

Proposals which result in the destruction or degradation of irreplaceable habitats will be refused, unless an absolutely exceptional reason and exceptional mitigation/compensation strategy exists. This includes impacts through direct or indirect pathways, including lighting and pollution. The evidence burden for this would be high.

Such habitats include ancient woodland, ancient and veteran trees (within and outside of ancient woodland), very mature trees showing early signs of veteranisation, blanket bog, mires, sand dunes, salt marsh and lowland fen.

Hedgerows

Important hedgerows (as defined by the Hedgerow Regulations 1997) are considered to have very high intrinsic biodiversity value. Proposals resulting in the loss of important hedgerows, or sections of important hedgerows, will only be permitted where the mitigation hierarchy has been applied and evidenced in earnest.

Impacts should first be avoided, and where this is not possible, justification for impacts should be provided in full. Following this, suitable avoidance and mitigation measures should be proposed, followed by compensation measures as a last resort.

With all hedgerows types, hedgerow translocation should always be considered first, as a preferential option to hedgerow destruction followed by compensation.

Justification for inclusion of policy

- 1.755. Some habitats are considered to be irreplaceable due to the fact that they are incredibly technically difficult (or take a very significant amount of time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. Planning permission will not be granted for proposals which could result in the destruction or degradation (through direct or indirect impacts) of irreplaceable habitats, unless an absolutely exceptional reason and exceptional mitigation/compensation strategy exists, as per section 180c of the NPPF 2109.

- 1.756. An exceptional reason could include nationally significant infrastructure projects, or development which is clearly in the public (not private) interest, but only where the benefit is substantial and clearly outweighs the harm to receptor. A suitable, exceptional mitigation strategy would still be required in any circumstance where habitat degradation or destruction is proposed. Natural England will be consulted where these impacts are proposed.
- 1.757. Hedgerows are incredibly valuable biodiversity resources, which often come under threat by development. Devon boasts the largest hedgerow network in England. East Devon's Hedgerows are typically very old, and contain specific soil conditions, understorey vegetation communities and structural niches. These conditions support a wide range of wildlife, including protected and notable species. These factors are difficult and sometimes impossible to recreate once lost. It is therefore imperative to protect and enhance these features, and promote their appropriate consideration during the planning process, including promoting the proper application of the mitigation hierarchy.
- 1.758. Compensatory hedgerow planting takes a considerable amount of time to establish (more than 10 years) and leads to varied results. Where appropriate, translocation of existing hedgerows can decrease establishment time, retains some of the original soil conditions and biota, retains some ecological niches, retains the understorey seed bank - resulting in a better quality hedgerow following works. The council will support and promote hedgerow translocation, rather than replacement.

Habitat Regulation Assessment

- 1.759. The most significant wildlife sites in East Devon benefit from an international designation and for these sites and where adverse impacts may be possible from development there is a need for assessment under the Habitat Regulations to determine the acceptability of proposals. Plan policy set out details of the approach to be taken.

77. Policy – Habitats Regulations Assessment

HRA process and requirements

Proposed plans or projects must not adversely affect the integrity of sites protected under the Conservation of Habitats and Species Regulations 2017. These sites consist of:

- i. Special Areas of Conservation (SAC)
- ii. Special Protection Areas (SPA)
- iii. Proposed SACs
- iv. Potential SPAs
- v. Ramsar sites
- vi. Areas secured as sites compensating for damage to a European site

The proponent of the plan or proposal must provide all necessary information to allow the planning authority to carry out Habitats Regulations Assessment (HRA) of the proposal.

Where potential adverse impacts are identified, suitable avoidance, mitigation and compensation measures will be required. The mitigation hierarchy and precautionary principle should be applied and evidenced by proponents when assessing impacts, and proposing avoidance, mitigation and compensation measures. Legislation and government guidance requires the planning authority to be confident beyond reasonable scientific doubt that the proposals will not result in an adverse effect on the integrity of the site. Consequently, we will require evidence of a high quality and accuracy to inform HRA.

Adverse impacts that cannot be avoided or adequately mitigated will not be permitted other than in exceptional circumstances.

Specific HRA policy requirements in relation to avoiding, mitigating and compensating for HRA impacts

Nutrient neutrality and required water efficiency measures from proposals in the River Axe SAC catchment, as a result of HRA requirements and nutrient neutrality.

In order to reduce phosphate discharge into the River Axe SAC, East Devon District Council requires development proposals within the River Axe catchment to demonstrate how nutrient neutrality will be achieved. The Council will seek to provide mitigation measures that developers can buy into, or mitigation can be secured through other provider's services or directly through or by development.

Water efficiency measures can form a positive way to help work toward and could in exceptional cases secure nutrient neutrality and are required to be incorporated into all new dwellings, overnight accommodation, and any other proposals which result in grey water and/or black water discharge where waste water efficiency measures could be applied.

Protection of Beer Quarry Cave SAC bat pinch points between Seaton and Colyford, and between Colyford and Colyton

In order to protect the pinch points and secure their long term suitability for the SAC bat species, planning permission will not be supported for any development proposals within the pinch points, or support any applications which reduce the quality of the bat foraging and commuting habitats within these pinch points. The objective is for these pinch points to be retained in perpetuity, and enhanced where possible in order to guard against potential future development pressure

Development within 400 m of the East Devon Pebblebed Heaths SPA

Predation of birds by domestic cats is already identified as a particular concern on the East Devon Pebblebed Heaths. Any increase in the number of homes could result in increased cat numbers, which would further exacerbate adverse impacts and predation. To help preserve the integrity of the East Devon Pebblebed Heaths, specifically on account of the impacts of domestic cats through bird predation, new dwellings will not be allowed on or within 400 metres of the Pebblebed Heaths.

Specific HRA mitigation strategies and guidance

Plans and proposals should take into consideration and be in accordance with the latest versions of all council and wider HRA guidance documents and strategies. These documents and strategies are intended to inform HRA assessment and mitigation requirements, improve the quality of proposals and provide a strategic EDDC response to carrying out HRA and providing coherent mitigation, where applicable. These documents include (existing and pending production):

- i. East Devon Pebblebed Heaths and Exe Estuary HRA strategy (existing)
- ii. Beer Quarry Caves SAC Guidance Document (existing)
- iii. Exmouth Imperial Recreation Ground Events Protocol (existing)
- iv. River Axe SAC Mitigation Strategy

Justification for inclusion of policy

Habitat Regulations Assessment

- 1.760. As a Competent Authority, the planning authority has a duty to carry out Habitats Regulations Assessments (HRA), in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended). European Sites and European Offshore Marine Sites identified under these regulations are referred to as 'habitats sites'. These are sites of international importance for wildlife.
- East Devon Contains 6 Habitats sites:
 - Exe Estuary Special Protection Area (SPA) (also a RAMSAR site)
 - East Devon Pebblebed Heath Special Area of Conservation (SAC)
 - Beer Quarry and Caves SAC
 - River Axe SAC
 - Sidmouth to West Bay SAC
 - Lyme Bay and Torbay SAC
- 1.761. All plans and projects (including planning applications) which are not directly connected with, or necessary for, the conservation management of a habitats site, require consideration of whether the plan or project is likely to have significant effects on that site. This consideration – referred to as the 'Habitats Regulations Assessment Screening' – should take into account the potential effects both of the plan/project itself (direct and indirect) and in combination with other plans or projects. Where the potential for likely significant effects cannot be excluded, the council must make an Appropriate Assessment of the implications of the plan or project for that site, in view the site's conservation objectives. Natural England are a statutory consultee on all Appropriate Assessments. Planning permission may be granted for a plan or project only after having ruled out adverse effects on the integrity of the habitats site. Where an adverse effect on the site's integrity cannot be ruled out, and where there are no alternative solutions, the plan or project can only proceed if there are imperative reasons of over-riding public interest and if the necessary avoidance, mitigation or compensation measures can be secured.
- 1.762. This policy is proposed to provide clarity to proponents of plans or projects as to the specificities of HRA, and the evidence burden required of them. The policy details specific proposed policy elements which avoid and mitigate impacts on specific habitats sites.

River Axe SAC Waste Water Efficiency Measures

- 1.763. The River Axe Special Area of Conservation (SAC) is being negatively impacted by poor water quality, largely due to increased phosphate levels. Proposals which result in increased phosphate levels in the River Axe SAC require HRA, with mitigation of the proposed increases in phosphate levels being secured in perpetuity through the HRA process. Such proposals include new residential units and overnight accommodation, as well as many others. This will be described and addressed fully

in the proposed River Axe HRA Mitigation Strategy document. As part of this strategy, East Devon District Council are required to follow the mitigation hierarchy and apply a precautionary approach to carrying out HRA, within policy, strategy and when carrying out individual HRAs.

- 1.764. In terms of new proposals, the increases in phosphate loading of the River Axe SAC are from two sources – increased surface water runoff, and increased grey and black water discharge. East Devon District Council therefore require all new proposals within the River Axe SAC catchment to have water efficiency measures incorporated to all new dwellings, overnight accommodation, and any other proposals which result in grey water and/or black water discharge. This reduces the amount of grey and black water (and thus phosphate) discharged from waste water treatment works as a result of development, in accordance with the mitigation hierarchy, i.e., avoiding and reducing impacts prior to mitigating and compensating for impacts.
- 1.765. Whilst the above regulatory procedures under the Habitat Regulations do not apply to other rivers in East Devon the council are, none the less, aware of and concerned by high nutrient levels across watercourses in East Devon and the adverse impacts they are causing. We will therefore carefully assess development proposals and planning application in respect of any possible increases in nutrient levels that could occur and will encourage measures to protect and where possible enhance water quality.

Beer Quarry Caves SAC Pinch Points

- 1.766. The areas of semi-natural habitats between the northern edge of Seaton and Colyford, and between Colyford and Colyton are known commuting routes for the three species of bats which form the qualifying features of the Beer Quarry and Caves SAC (greater horseshoe, lesser horseshoe and Bechstein's bats). These areas consist of mosaics of commuting and foraging features suitable for use by these species, and are used to facilitate dispersal into the wider landscape, as well as foraging.
- 1.767. These pinch points are limited in size due to urban encroachment. Further restriction of these pinch points could severely impact on the movement of the SAC bat species in the local area and hinder dispersal to important roosts in the wider landscape and local foraging resources such as Seaton Marshes. Development within the pinch points is likely to be irreversible.

Biodiversity Net Gain

- 1.768. Biodiversity net gain is the principle that the net result (the end position) after development had occurred is that the biodiversity or wildlife value is greater than that of any site that is being developed. The Government support biodiversity net gain and in East Devon we recognise the importance and are seeking to exceed minimum national levels.

78. Policy – Biodiversity Net Gain

Development proposals will need to result in a Biodiversity Net Gain of at least 20%, to be calculated and reported in accordance with published best practice local and national guidelines at the time of the application (except where published exemptions apply, de minimis or otherwise).

This is in recognition of:

- The combined biodiversity and climate emergency
- The large volume of development predicted within the district (particularly within the west end of the district) during the period of this local plan, and the potential significant biodiversity impact of this volume of development
- Requirement to identify measures to further the biodiversity objective under the Environment Act 2021
- The intrinsic health and well-being community benefits of habitat creation
- The flood risk mitigation benefits of habitat creation
- The water and air purification benefits of habitat creation
- Requirement to implement and support the Local Nature Recovery Strategy (LNRS)
- Commitments to implementing the recommendations of the Lawton Report

Where off-site habitats are created or enhanced in order to provide 20% BNG, these should be located within East Devon District, unless proven and evidenced to be undeliverable.

Justification for inclusion of policy

- 1.769. The Environment Act 2021 requires all development proposals (except where exemptions apply) to result in a Biodiversity Net Gain (BNG) of at least the relevant percentage (currently set at 10% by the regulations). The Environment Act 2021 also requires identification of measures to further the biodiversity objective (i.e., measures to enhance nature recovery in the district) and act on those measures.
- 1.770. The planet is facing an ecological emergency. Globally, wildlife populations have declined by over half in the past 50 years (Living Planet Report 2018). Over 1 million animal and plant species are now threatened with extinction, and the planet is currently undergoing the sixth mass-extinction event in history, as a result of human activities and behaviour (Intergovernmental Science-Policy Platform on

Biodiversity and Ecosystem Services (IPBES) 2019I). Within the UK, 13% of England's species are under threat of extinction, with 35% having declined in number and 133 species made extinct since 1970 (State of Nature Report, 2019).

- 1.771. The Lawton Report (2010) recommended “a step-change in our approach to wildlife conservation, from trying to hang onto what we have, to one of large-scale habitat restoration and recreation, under-pinned by the re-establishment of ecological processes and ecosystem services, for the benefits of both people and wildlife.”. This report concluded that in order to establish a coherent and resilient ecological network, habitats need to be “bigger, better, and more joined up”.
- 1.772. Nature recovery through habitat creation can lead to a myriad of interlinked benefits for society. Natural and semi-natural habitats (such as those delivered through biodiversity net gain) can be intrinsically linked to sustainable development, mitigation of climate impacts (flooding, heat extremes), carbon storage, and improvement of mental health and well-being.
- 1.773. East Devon contains a high diversity of ecologically important sites and habitats, however, many of these are sporadic and small, and exist in isolation without connection to other similar habitats. In order for the council to further the biodiversity objective, make progress towards halting biodiversity loss and aid biodiversity recovery in the district, East Devon District Council recognise the need to take action to implement the recommendations of the Lawton Report (increasing the area of natural/semi-natural habitats, improving the quality of existing habitats, and connecting isolated habitats. Biodiversity net gain provides a mechanism to achieve some of these goals.
- 1.774. Biodiversity net gain is a new system. Habitats are to be secured and maintained for at least 30 years through legal obligations, in order to meet a target habitat type and condition. Delivery and long-term security of habitats is not yet fully tested, which leads to uncertainty in outcomes. Delivery and aftercare of compensatory habitat is complex, both in terms of physical management and legal obligations. When uncertainty exists within environmental decision making, the precautionary principle should be applied. The precautionary principle is a basic tenet of environmental decision making. The precautionary principle proposes taking preventive action in the face of scientific uncertainty and shifting the burden of proof to the proponents of an activity. It needs to be recognized that the Council must apply the precautionary principle to avoid trading certain biodiversity losses for uncertain biodiversity gains.
- 1.775. The DEFRA Evidence Base and Impact Assessment Report for biodiversity net gain (2017) made an assessment of the potential cost of biodiversity net gain to government and developers. Table 27 (page 60) estimates that increasing the net gain percentage to 20% from 10% results in an increase in initial biodiversity net gain delivery cost of ~18%, and a corresponding 29% increase in the area (ha) of habitats created.
- 1.776. Swale borough Council used the DEFRA viability study to evidence that 10% BNG costs developers approximately £948/dwelling, and 20% costs approximately £180/dwelling more. The majority of biodiversity net gain cost to developers is within the first 10% of delivery, with reduced cost to deliver additional net gain.

Local Nature Recovery Strategy and Nature Recovery Network

- 1.777. Local nature recovery is the concept that environmental quality and biodiversity can be enhanced by improving areas for wildlife and creating green links between habitats to allow wildlife value to be enhanced and increase. The concept of nature recovery is increasingly gaining ground and is being actively promoted across Devon.

79. Strategic Policy – Local Nature Recovery Strategy and Nature Recovery Network

In accordance with the LNRS and Environment Act 2021, all proposals must contribute to the strategic objectives of the LNRS in order to facilitate meaningful, strategic nature recovery where possible.

In practice, this means that development within the mapped NRN areas (including the proposed nature recovery areas) will not be supported, unless it is proven that the need cannot be met elsewhere in the district, is of overriding public interest, and that the proposals will result in a significant net gain to biodiversity, in excess of the standard policy requirement. Retention and enhancement of habitats in these areas is therefore considered to be of strategic significance, and must be entered inputted as such within the biodiversity net gain metric tool.

Proposals which result in enhancement of existing NRN features, expansion of existing features within NRN areas, and increase landscape scale connectivity of ecological features within NRN areas will be supported. Biodiversity Net Gain (BNG) credit creation and BNG delivery within NRN areas is encouraged. BNG delivery in these areas is therefore formally identified as being in an area of strategic significance within the biodiversity net gain metric tool.

Justification for inclusion of policy

- 1.778. The Environment Act 2021 requires a Local Nature Recovery Strategy (LNRS) to be produced for every area of England. Devon County Council (DCC) are the “responsible authority” for delivering the LNRS, but local authorities, such as EDDC, must have had input to the LNRS. The LNRS contains a statement of biodiversity priorities and a local habitat map for the strategy area, which will take the form of Nature Recovery Network (NRN) mapping. EDDC has contributed to the Devon Local Nature Recovery Strategy (LNRS), through identifying specific priorities for East Devon and inputting to NRN mapping.
- 1.779. The LNRS and NRN work is intended to implement the principles for nature recovery identified in the Lawton Report (2010) – “Bigger, better, more joined up” (in reference to ecological networks and habitats). Nature recovery in the district will be

focused on landscape scale features and mosaics of habitats, in order to improve quality of existing features, expand existing features and connect isolated features. This will provide ecological resilience and provide a landscape scale strategy area within which to focus nature recovery.

The LNRS contains:

- A description of the biodiversity of the strategy area.
- Opportunities for recovering and enhancing biodiversity in the strategy area.
- Priority habitats and species for recovering and enhancing biodiversity (taking into account the contribution that recovering or enhancing biodiversity can also make to other environmental benefits).
- Details of measures proposed to achieve the recovery and enhancement of priority habitats and species.

1.780. The NRN map has been created through a process of combining existing identified sites of wildlife value, and then extending/connectivity habitats in accordance with suitable underlying geology/soil conditions in order to identify areas within which nature recovery should be focused. Links to the current NRN mapping version can be found on the EDDC website.

1.781. Existing sites of wildlife value which were combined to create the NRN are:

- Special Areas of Conservation (SAC)
- Special Protection Areas (SPA)
- Ramsar sites
- Sites of Special Scientific Interest (SSSI)
- Marine Conservation Zones (MCZ)
- National Nature Reserves (NNR)
- Local Nature Reserves (LNR)
- County Wildlife Sites (CWS)
- Special verges
- Ancient Woodland Inventory sites (AWI)
- Mapped Habitats of Principle Importance, as listed under S41 of the Natural Environment and Rural Communities (NERC) Act 2006

Ecological Impact Assessment

1.782. Ecological Impact Assessment is an exercise undertaken, to support development proposals, to understand the impacts that schemes may have on biodiversity assets and to ensure adverse impacts are minimised and opportunities for enhancements are gained.

80. Policy – Ecological Impact Assessment

To ensure that potential ecological impacts and mitigation measures are properly considered, Ecological Impact Assessment (EclA) should be carried out in accordance with published best practice guidance, such as the published Chartered Institute of Ecology and Environmental Management (CIEEM) EclA guidelines.

Protected species survey work should follow published best practice guidelines. Any deviation from best practice should be clearly stated within the EclA, with reasoning as to why best practice guidance has not been followed. Cost of survey effort and potential for delays are typically not valid reasons to deviate from best practice guidelines.

Deviations from best practice can include (but are not limited to):

- Surveying outside of designated optimal survey periods.
- Insufficient frequency/number of surveys to inform an accurate categorisation of the ecological feature.
- Insufficient equipment, i.e., use of equipment which does not meet the standard required.
- Surveys carried out by insufficiently experienced staff.
- Inability to access key areas of the site in order to carry out survey.
- Lack of consideration of ecological links with nearby features of ecological importance.

Proposals should contain all relevant ecological survey information required for EDDC to make an informed decision. Surveys should not be conditioned as part of a granted permission, as doing so would mean that EDDC has not fully considered and assessed the ecological impacts of the proposal prior to granting consent, and have therefore not fulfilled our biodiversity duty - to have regard to conserving biodiversity. Any necessary avoidance, mitigation, compensation or enhancement measures could have an impact on the layout of the site, and therefore should be included within the applications in a suitable level of detail according to the type of application.

The mitigation hierarchy

All proposals should be developed in line with The Mitigation Hierarchy. This is a hierarchal process whereby proposals should first seek to avoid biodiversity impacts. Where impacts cannot be avoided, measures should be proposed to mitigate (lessen the impact) of the proposals. Where residual impacts exist (following mitigation), impacts should be compensated for. Compensation is a last resort and should only be considered once avoidance and mitigation measures have been fully considered and are reasoned to be unachievable.

The precautionary principle

The precautionary principle is a tenet of environmental decision making. The precautionary principle has four central components: taking preventive action in the face of scientific uncertainty; shifting the burden of proof to the proponents of an activity; exploring a wide range of alternatives to possibly harmful actions; and increasing public participation in decision making.

The precautionary principle should be applied to decision making within planning applications, particularly where non-standard survey work or mitigation/compensation is proposed (i.e., decisions relating to ecological impacts and mitigation/compensation where guidance does not exist or is lacking in specificity or certainty). This is to ensure that positive outcomes to biodiversity are likely to occur where there is scientific uncertainty as to the accuracy of ecological impact assessments, baseline information provided, or the likely success of proposed mitigation/compensation measures.

In practice, this means that where there is reasonable doubt as to the certainty of ecological impacts, or the success of mitigation/compensation measures, then EDDC decision makers will err on the side of caution. This could mean requesting further ecological survey information or improving mitigation/compensation design in order to remove or reduce scientific doubt.

Justification for inclusion of policy

- 1.783. This policy ensures proper adherence to ecological impact assessment method and also affords EDDC some backing in decision making situations where distinct survey and mitigation guidelines do not exist, but where we have concerns over likely impacts and success of mitigation measures proposed. This policy shows EDDC's commitment to fulfilling their biodiversity duty within decision making, and shows that EDDC are considering non-standard impacts, the mitigation hierarchy and the precautionary principle.

Protected and notable species

- 1.784. A number of wildlife species are especially important and are afforded particular attention. Plan policy highlights how this protection will be applied in practice in respect of planning applications and their determination.

81. Policy – Due consideration of protected and notable species

Protected and notable species

Proposals should adequately consider all relevant direct and indirect impacts on protected and notable species, in order to maintain and enhance the conservation status of these species at the relevant geographic scale.

For avoidance of doubt, these species include (but are not limited to):

- European Protected Species (species listed under Annex II and IV of the Habitats Directive).
- Section 41 species of Principle Importance (those listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006).
- Species listed under schedules 1, 5 and 8 of the Wildlife and Countryside Act 1981.
- Red and Amber listed birds within Birds of Conservation Concern 5
- Any Red Data Book, Nationally or Regionally Notable species.
- In all circumstances the mitigation hierarchy should be applied, and the precautionary principle applied to the provision of suitable avoidance, mitigation and compensation measures.

Development that is likely to have an adverse impact on European Protected Species will only be permitted if the three relevant licensing tests are likely to be met:

- That there is not satisfactory alternative
- That there is a purpose and genuine need for the proposal
- That the proposal, including mitigation, is considered to have no impact on the favorable conservation status of the species concerned.

Invasive species

Proposals should adequately consider their impacts on invasive non-native species, such as those listed under Schedule 9 of the Wildlife and Countryside Act 1981. Where Schedule 9 species are present within an application boundary, EDDC expect that the proposal would include a full invasive species removal plan, in order to remove the species from the site in perpetuity and guard against future spread on site, prevent re-establishment following removal, and prevent potential colonization of adjacent habitats.

Justification for inclusion of policy

Protected and notable species

- 1.785. East Devon supports a wide range of protected and notable species, in part due to our excellent diversity of priority habitats and designated sites. This policy recognizes the biodiversity duty placed on EDDC and provides clarity as to the expectation of the council.

Invasive species

- 1.786. It is an offence to allow or cause plants listed under Schedule 9 of the wildlife and to spread into the wild. This policy is a measure to further the biodiversity objective as per our requirements under the Environment Act 2021. Invasive species are stated to be one of the most detrimental environmental impacts caused by humans, and are predicted to have cost the UK between £5.4 – £13.7 billion in reported losses and expenses since 1976 (Economic costs of biological invasions in the United Kingdom ([pensoft.net](https://pensoft.net/Economic-costs-of-biological-invasions-in-the-United-Kingdom-pensoft.net)[Economic costs of biological invasions in the United Kingdom \(pensoft.net\)](https://pensoft.net/Economic-costs-of-biological-invasions-in-the-United-Kingdom-pensoft.net)) – although this is acknowledged within the paper that this is likely to be an under-estimate. EDDC should be prescribing that developers remove invasive species from their land to reduce abundance and prevent future spread into the wild. This is not totally prescriptive – hence the use of the word “expect”, for use in circumstances where this may not be achievable.

Design feature for wildlife enhancement

- 1.787. Through new development it is very sensible to seek to create new areas and feature in which wildlife can thrive. We have therefore established policy to promote wildlife enhancement in development proposals.

82. Policy – Ecological enhancement and incorporation of design features to maximize the biodiversity value of proposals

In addition to any features provided as part of required mitigation or compensation measures, all proposals are required to include functional features of biodiversity value which are tailored to specific proposals and relevant local receptors. These features should be proposed in accordance with best practice, in locations which maximize the potential benefits of the provided features, such as areas with high habitat connectivity, low human disturbance and low lighting levels.

As a minimum, the following features are required within new proposals where relevant:

- Integrated bird boxes in suitable locations at an average of one per dwelling, or a relevant number to be agreed with EDDC for flats or non-dwelling applications, to be provided in accordance with BS42021:20221.
- A range of integrated bat boxes in all locations suitable for use by bats (i.e., adjacent to suitable habitats and not significantly impacts by artificial lighting).
- An integrated bat loft within all Major (TCPA) planning applications, if ecologically relevant (i.e., if the site is a suitable location for a bat loft be constructed - not too isolated or within unsuitable habitat such as heavily urbanized well-lit areas).
- Overhanging eaves suitable for nesting house martins in all Major (TCPA) applications
- Gaps in the bases of garden fences (between gardens, and within fences between gardens and wider ecological networks, to facilitate movement of hedgehogs and other protected and notable species).
- Other features that should be included where relevant include (but are not limited to):
 - Reptile/amphibian hibernacula.
 - Brash piles.
 - Invertebrate bricks.

The location and specification of biodiversity features should be designed with input from a qualified ecologist. Bat and bird boxes should be integrated within the fabric of the building to ensure longevity and retention when ownership changes (i.e., to avoid removal by new owners).

Justification for inclusion of policy

- 1.788. Over the plan period, East Devon will see significant development growth, which will in turn place greater pressure on the natural environment. This growth can also provide opportunity for nature recovery, if carried out appropriately.
- 1.789. This policy is mechanism for EDDC to further the biodiversity objective, in accordance with the requirements of the Environment Act 2021, and is seen to be essential to the potential recovery of certain receptors, such as swifts. This is increasingly important in the current biodiversity crisis, within which the majority of new homes offer no value to wildlife.
- 1.790. Paragraph 179b of the NPPF states that plans should promote enhancement of ecological networks and recovery of priority species, and identify and pursue opportunities for securing measurable net gains for biodiversity. The measures in this policy are designed to carry out this purpose. The priority species concerned (priority bird species, bats, reptiles, hedgehogs etc.) would benefit from the proposed measures. Many priority species can thrive in urban and semi-urban locations, as well as within man-made structures themselves, if facilitated. Examples include swifts, bats, hedgehogs and common reptiles.
- 1.791. The recent BS42021:20221 guidance has provided evidence of the high occupancy rates of integrated bird boxes, and has been adopted and endorsed by the RPSB, as well as several large housing developers. EDDC endorse this guidance and promote its use throughout the district.

Trees in East Devon

- 1.792. Trees form a hugely important wildlife assets and are attractive features in their own right. We are promoting enhancement of trees and tree coverage in the district.

83. Policy – Tree policy

East Devon District Council has recently committed to contributing to the Devon Tree Strategy, which is a Devon wide strategy being prepared by all Devon Authorities (excludes Plymouth City Council). The Tree strategy will outline high level tree objectives which will be split by district. The strategy will also feature a policy review and recommendations, based on successful and progressive tree policies elsewhere in the country.

The intent is that plan policy will be produced will draw this Devon wide guidance assuming it is completed – this will hopefully be in early/mid 2023.

The Council has several high level policy objectives regarding tree a strategy. These include:

- Increased tree planting within proposals, including street tree planting minimum specification.
- Minimum standard tree numbers for new hedgerows in proposals
- Expectation for tree retention during development
- Accounting for climate change and local characteristics within selection of appropriate trees

Full tree policy drafts and justification are therefore expected in the future.

Justification for inclusion of policy

1.793. Full justification is to be drafted but will reference climate change resilience, addressing the biodiversity crisis, health and wellbeing, a greener East Devon, better quality of developments and increased access to nature. It will also reference the essential importance of trees to human welfare and well-being and their role in enhancing built and living environments. The intent is that this text will be expanded on for the 1 November 2022 redraft if this plan.

Geology and Geodiversity

1.794. East Devon has a varied and important geology that has helped shaped the district, built natural features and human made buildings and structures over many years. Perhaps most notably this is can be recognised along the East Devon coastline which is internationally recognised for its geological importance.

The Dorset and East Devon Coast World Heritage Site

- 1.795. Most of the East Devon coastline forms part of the Dorset and East Devon Coast World Heritage Site (often referred to as the Jurassic Coast). This coastline was given international recognition in 2001 on account of its exceptional geological importance and as such joined a global family of unique and exceptional places that illuminate humanity's collective history, identity and relationship with nature.

84. Policy – Protection and enhancement of the Jurassic Coast World Heritage site

Development within the Jurassic Coast World Heritage site, or that could adversely impact on its setting, will only be permitted if it can be demonstrated that the Outstanding Universal Value of the coastline and specifically its geological importance, will not be adversely affected.

Applications for planning permission that could give rise to adverse impacts, will be assessed in respect of:

- The setting and importance of the site;
- The inherent attributes and geological qualities of the site, specifically relating to the its 'Outstanding Universal Value';
- The grounds and reasons for its inscription; and
- Its overall integrity (including possible incremental loss) and local impacts of development.

The international importance of the site and its setting is such that development proposals will be rigorously reviewed in determination of planning applications and this policy will sit alongside other affording coastal and countryside protection and enhancement.

Policy will seek to afford protection to the World Heritage site and at a more local level to geodiversity interests. In respect of the Jurassic Coast policy will seek to protect and not compromise the Outstanding Universal Value that justifies its designation.

Justification for inclusion of policy

- 1.796. The Jurassic Coast is a hugely diverse and beautiful landscape underpinned by incredible geology of global importance. In 2001 it was inscribed as a World Heritage Site by UNESCO for the outstanding universal value of its rocks, fossils and landforms. It remains England's only natural World Heritage Site though it is not

a statutory designation site and as such is not afforded national policy protection that statutory designations are offered.

- 1.797. The Jurassic Coast begins at Orcombe Point at Exmouth in East Devon, and continues eastward for 95 miles to Old Harry Rocks near Swanage in Dorset and its clearly and visibly presents a continuous and time stepped range of geological exposures along its entire length.
- 1.798. The Jurassic Coast Partnership Plan 2020-2025; see [7e0ff0f0-426f-523d-bd45-cc1fe4d60fac \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/7e0ff0f0-426f-523d-bd45-cc1fe4d60fac) identifies the 'Outstanding Universal Value' (OUV) of the World Heritage coastline and identifies the following OUV attributes:
- Stratigraphy (the rock record) and structure;
 - Palaeontological record;
 - Geomorphological features and processes;
 - Ongoing scientific investigation and educational use, and role in the history of science; and
 - Underlying geomorphological processes in the setting of the Site
- 1.799. The Partnership Plan highlights the geological value of the WHS, and identifies a significant opportunity to promote the role of geodiversity within the area's landscapes; with an emphasis on the presentation of the site and people's ability to use and enjoy it.
- 1.800. A key characteristic of the WHS is its high rate of erosion, creating a dynamic coastline which maintains rock exposures. Development requiring increased coastal defences would therefore be harmful to the OUV of the site. Likewise development at or on the inscribed area that could adversely impact on the site and be contrary to reasons for inscription will be closely assessed and unless schemes can be accommodated in an acceptable manner planning permission for development will be refused.

Sites designated for their geological importance

- 1.801. Geological sites may benefit from national designation, specifically as Sites of Special Scientific Interest (putting them equal to wildlife sites with the same designation) on account of their geological value and importance. Plan policy specifically seeks to afford protection to these designated sites.

85. Policy – Protection of designated geological sites

Protection of Nationally important geological sites

Proposals and plans that would cause a direct or indirect adverse effect upon nationally designated geological sites will not be permitted unless all of the following criteria are met:

- a) They cannot be located on alternative sites that would cause less or no harm.
- b) The public benefits of the proposal clearly outweigh the impacts on the features of the site and the wider network of natural habitats and designated sites.
- c) Suitable avoidance, mitigation and compensation measures are proposed, in accordance with the mitigation hierarchy.
- d) Where possible the integrity of the site will be maintained.

Justification for inclusion of policy

- 1.802. Geological sites are designated because of their importance and intrinsic qualities. They can be of both scientific and educational value and will also be supportive of and complementary to wildlife interests. Indeed it is the underlying geology that can be or often is the determinant of wildlife species present and value. Some sites may be designated as SSSIs for both geological and wildlife value
- 1.803. Statutory designated geological sites, specifically Sites of Special Scientific Interest, are recognised for their geological importance. Local plan policy seeks to complement existing legislation and government guidance, and seeks to add detail on when adverse impacts may be permitted.

Regionally Important Geological and Geomorphological Sites

- 1.804. At the local level there are sites or areas that are designated as Regionally Important Geological and Geomorphological Sites (RIGS). These sites are identified for their scientific and educational value and provide a valuable local asset to complement nationally designated or recognised sites.

86. Policy – Regionally Important Geological and Geomorphological Sites

The granting of planning permission for development or land-use changes that may have an adverse effect, either directly or indirectly, on Regionally Important Geological and Geomorphological Sites will only be permitted if the justification for the proposed development clearly outweighs any harm to the intrinsic scientific or educational value of the site.

Where development is permitted mitigation will be required to minimise the negative impacts and where this is not possible adequate compensatory enhancement or new site creation schemes will be required.

Justification for inclusion of policy

- 1.805. Regionally Important Geological and Geomorphological Sites (RIGS) are places in Devon that are considered to be especially important for the geology they exhibit. The Devon Regionally Important Geological and Geomorphological Sites Group was established in 1991 and is a voluntary organisation exclusively concerned with geological conservation in Devon. The Group is composed of a wide selection of individuals from professional geologists to amateurs interested in conserving the county's important geological history. The group establish and define RIGS and they are an important educational, historical, and recreational resource. The following criteria are used for site selection, taken from the Nature Conservation Committee (NCC) strategy:
- Education – for fieldwork in primary and secondary schools, at undergraduate level, and in adult education courses.
 - Scientific Study/Research – by professional/amateur Earth scientists. These sites demonstrate the geology/geomorphology of an area, either alone or as part of a network.
 - Historical – for their important advances in Earth science knowledge or economic important.
 - Aesthetic – qualities to the landscape, particularly for promoting public awareness and appreciation of Earth Sciences
- 1.806. RIGs are mostly old quarries, pits, roadside cuttings and other excavations which expose rocks normally covered by soil and vegetation. Some sites are, however, natural exposures of interesting rocks in river banks and cliffs, and others are fine views which demonstrate how the underlying geology and forces of erosion have shaped the landscape.
- 1.807. It is notable, therefore, that RIGS are often 'created' through the processes of development and can often result as an action of human intervention. Where development offers scope to show or expose geological features in an interesting and informative way we would welcome inclusion in planning applications submission about how such potential can be realised.
- 1.808. By recognising localities as County Geological Sites, activities which might damage or destroy their geological value will be avoided. The group, working together with local authorities and other public bodies, try to safeguard sites from harm and inappropriate development through the planning system. In addition, by working with the owners/occupiers of sites, the group hopes to promote their positive management.

14. Open space and sports and recreation facilities

The importance of open space and sport and recreation facilities

- 1.809. Having ready and easy access to attractive open spaces for all people at all stages of life is critical for mental and physical wellbeing. In East Devon we are blessed with an exceptionally attractive environment with many high quality and accessible open space areas. However, this does not translate to everyone having readily accessible open space available to use and enjoy.
- 1.810. We have, therefore, set out an over-arching strategic policy position in respect of open space and sports facility provision. Policy seeks to set an agenda for provision of open space and recreation provision to match and be aligned with new development coming forward and if or where possible to address deficits in current provision.

87. Strategic Policy – Access to open space and recreation facilities

Support will be given for the provision of new and enhanced access to high quality open space and sports and recreation facilities.

A key consideration in accommodating new development will be to ensure that residents, visitors to or users of any new scheme must be able to access open spaces and sports facilities and enjoy the benefits that such spaces and facilities offer. Such an outcome will require that availability of space and safe and easy access for all to it for all will need to be fully taken into account at the outset of designing any development scheme or proposal.

Qualitative (how good it is) and quantitative (how much there is of it) assessments of open space provision, in respect of what exists now and what is planned will be determining considerations in the decision-making process. Securing planning permission for development will require meeting and ideally exceeding specified standards of provision.

Justification for policy

- 1.811. Open spaces and their use and availability can be divided between those that are used for informal recreational activities, for example as simple as just going for a walk in a nice green environment, through to those used for formal sport or recreation activities, such as playing a game of football.

- 1.812. For informal activities the expansive open spaces area of East Devon, including the coast and countryside and parks, gardens and other open areas form spaces that are widely enjoyed. In some areas, especially the more urban, and for people with limited mobility access such spaces can, however, be challenging and concerns are compounded for those without access to a car or private vehicle. When it comes to formal recreation facilities, specifically playing pitches for sport and recreation, accessibility can be more challenging with the availability and quality of pitches and facilities being variable across the District but with a general picture of high demand for facilities and many be used at levels that at or exceed capacity.
- 1.813. The Council has a draft Leisure Strategy that was completed in summer 2022, this document is still to be finalised (at September 2022) but it will help inform and guide overall planning policy, see:
- [70622 East Devon District Council Leisure Strategy.pdf](#)
- 1.814. The Leisure Strategy will be complemented by a Built Sports Facility Strategy and A Playing Pitch Strategy both are in production at Autumn 2022. The new Playing Pitch Strategy will supersede a strategy that was approved in 2015, see:
- [Open Space - Playing Pitch Strategy - East Devon](#)
- 1.815. The new Playing Pitch strategy will assess availability, access and use of pitches used for football, cricket, hockey, rugby and tennis, but in this draft local plan we refer to previous study outputs.
- 1.816. Assessment work for indoor and outdoor facilities will identify where improvements to existing facilities may be desirable and where extra facilities may be needed, or perhaps (and exceptionally) if there may be an existing over provision. The strategy documents, specifically from a planning and planning policy perspective, will help inform policy that seeks to protect existing facilities from loss and provide for additional facility in association with new development. More widely, and typically beyond the remit or role of planning, the strategy documents may be used by the Council and other bodies to inform decisions on maintenance and enhancement of existing facilities and bidding for monies for new or enhanced facilities.

Quantified open space standards applicable for new development

- 1.817. Where new development schemes come forward, especially for housing development, it will be essential that they have access to appropriate levels of existing open space (and will not in their own right generate a shortfall through using up spare capacity) or that they will provide or contribute to new open space provision.
- 1.818. Plan policy sets out quantified open space standards.

88. Policy – land and buildings for sport, recreation and open space areas in association with development

Planning permission for new housing development will only be granted where there is, or there will be, land and space of at least the quantified levels as set out in this policy. Noting that levels set out in this policy are a guide to provision from a now dated study that will need to be updated in the light of updated assessment on supply and needs.

Developments proposing net new dwellings will be expected to provide for open space on-site in line with the table below where there is a demonstrable need for such open space in the vicinity. Developments will be assessed against existing provision in the parish in which they are proposed. Where existing provision of specific typologies exceeds quantity standards, on-site provision will only be required where the existing open space typology is of poor quality or is in some other manner deficient such as not matching up to the accessibility standard.

Developments will be expected to provide open space on-site through a Section 106 Agreement in line with the following thresholds:

- 9 dwellings or less will not be required to provide any specific open space typologies on-site, however developers may choose to make such provision.
- 10 – 49 dwellings will be required to provide amenity open space on-site as per the standards below.
- 50 – 199 dwellings will be required to provide amenity open space, and children's and youth play space on-site as per the standards below.
- 200+ dwellings will be required to provide for all open space typologies on-site as per the standards below.

Developments which do not meet policy requirements will be refused planning permission though there will be scope through negotiation to vary types and quantities of space if the net benefits achieved can be clearly shown to be greater than the tabulated need figures,

Provision of outdoor sports pitch requirements (grass and artificial) will be guided by work that is to be completed on a new Playing Pitch Strategy.

Urban standards apply to the operative town (Parish) council areas of Axminster, Budleigh Salterton, Exmouth, Honiton, and Ottery St Mary. Rural standards apply to developments everywhere else in the district. Existing open space sites will be protected and, where appropriate, new sites designated.

Open space type	accessibility standard (straight line distance)		quantity standard (Ha per 1,000 popn)		quantity standard (Sq.m per person)	
	Urban	Rural	Urban	Rural	Urban	Rural
Allotments	10 mins (480m)	11-15 mins (600m)	0.25	0.30	2.5	3.0
Amenity Open Space (including general useable greenspace although not just space left over after planning)	10 mins (480m)	10 mins (480m)	0.35	0.30	3.5	3.0
Outdoor Pitches (including both open access and limited access grass pitches)	11-15 mins (600m)	11-15 mins (600m)	0.65	1.50	6.5	15.0
Parks and Recreation Grounds (including formal parks and gardens and informal areas for sports/recreation)	10 mins (480m)	10 mins (480m)	1.00	0.40	10.0	4.0
Play Space – Children (including play areas and informal play space)	10 mins (480m)	11-15 mins (600m)	0.05	0.05	0.5	0.5
Play Space – Youth (including Multi-Use Games Areas, skateparks, youth shelters and play space for older children / teens)	11-15 mins (600m)	11-15 mins (600m)	0.05	0.05	0.5	0.5
Natural and Semi Natural (accessible) (including areas accessible to the public and managed on a natural/semi-natural basis)	15-20 mins (800m) & ANGSt	15-20 mins (800m) & ANGSt	1.00	1.00	10.0	10.0
Fixed Sports Facilities (including tennis courts and bowling greens)	New on-site facilities or contributions towards new or enhanced facilities may be required, however district-wide standards are not currently set. The Assessment of Fixed Sport Facilities for East Devon addendum report to the Open Space Study 2012 should be consulted to understand whether such a facility / contribution will be required or not.					
TOTAL			3.35	3.60	33.5	36.0

Justification for inclusion of policy

- 1.819. New development, specifically including where this gives rise to an increased population, can generate a need for additional facilities, unless under exceptional circumstances there is a demonstrable surplus of provision in the locality. Policy of the plan will require new facilities to match changes occurring in the local population. This policy will be most typically relevant where new housing is proposed. It may, however, have relevance where other forms of development could lead to changes in population or people in a locality. For example it could have applicability where a new commercial development results in a new concentration of workers in a given locality.
- 1.820. Facilities under this policy will include those for sport and recreation as well as more general open space areas.
- 1.821. We have a now dated Open Space Study from 2012 (Bennett Leisure & Planning Ltd & JPC Strategic Planning & Leisure Ltd (2012) East Devon Open Space Study - Final Report and Appendix A and Appendix B - Assessment of Fixed Sports Facilities for East Devon) that will be reviewed and updated in the coming months. We use the outputs from the dated study to guide the potential direction of planning policy. The work identified and mapped open spaces by differing area types across East Devon to quantify existing levels of provision.
- 1.822. Policy seeks to deliver new open space and enhancements to existing facilities in step with new residential development. Sites of less than 9 dwellings will not be expected to provide open space on-site as it is unlikely that sites of this scale will have a gross development area large enough to host meaningful facilities. This does not mean that such sites would not be permitted to have open space on-site. Sites of 10 to 49 dwellings should provide amenity open space on-site. Sites of 50 to 199 dwellings should provide some open space on-site - a meaningful size/value could be delivered on such sites but depending on the site specifics and local needs it may be more appropriate to deliver other open space typologies instead. Sites of above 200 dwellings should provide the full suite of open space typologies on-site. Developments of specialist accommodation such as for the active elderly will be considered using the same methodology as above, however where demands of occupiers can be shown to vary from normal/average demands alternative provision will be negotiable. On-site requirements for such housing will therefore be subject to negotiation during the planning application process in order to provide the most appropriate typology.
- 1.823. Population increase will be used to determine the relative demand created by different developments. For residential development contributions these will be on a per-dwelling basis and the level of contribution will be higher for larger housing than for small houses or flats. This will be determined by the average occupancy rates where the average occupancy acts as a multiplier reflecting population increase. The assumed average occupancy rates are as follows:
- a 1 bed dwelling = 1.5 persons,
 - a 2 to 4 bed dwelling = 2.22 persons,
 - a 5+ bed dwelling = 2.5 persons.

Contributions will only be sought towards the open space typologies for which there is an established deficiency in the quantity, quality or accessibility of open spaces within the parish in which a development takes place. Money collected may be pooled to fund publicly accessible open space projects

Location for new facility provision

- 1.824. New facilities for formal and informal recreation should be located where they will meet needs, are accessible to the population and where the uses proposed and types of activities that will be accommodated will be compatible with neighbouring uses and any wider plans for a general area. Providing safe and attractive links between open space areas can be an especially beneficial outcome of plan policy.

89. Policy – Location of facilities for sport and recreation, open spaces and allotments

Within or adjoining urban or built-up areas, planning permission will be granted for new open space areas, allotments, sports facilities and parks and for the upgrading or enhancement of existing facilities provided that unacceptable adverse amenity or environmental impacts do not arise from development.

Any new or enhanced provision should be readily accessible to all people with a particular emphasis attached to ensuring safe pedestrian and bicycle accessibility and any building works should be at most modest in scale and within or well related to the built form of settlements or development boundaries.

Justification for inclusion of policy

- 1.825. New facilities and open space can typically be expected to be accommodated on and within development sites, especially so for larger developments. In such cases they should be located in accordance with detailed design proposals for any specific development scheme taking into account design policies in this plan as well as specific characteristics of the development site.
- 1.826. Where they otherwise come forward for development, they should be accessible to close by residential populations and centres and avoid adverse impacts. Typically, new facilities can be expected to be close to built-up areas though but less formal open space uses can be more flexible in where and how they are accommodated with what could be limited scope for possible adverse impacts.

Avoiding the loss of existing facilities

- 1.827. Facilities used for sport and recreation can come under pressure for reuse or redevelopment for non-sporting and recreational uses or changes from one type of sporting use to another. Policy of the local plan will seek to resist such losses unless, under plan policy, there is clear justification.

90. Policy – Retention of land and buildings for sport and recreation use

Proposals that would result in the loss of open space currently or previously used for recreation and/or sports uses, play areas or playing fields will not be permitted unless at least one of the tests below is satisfied:

- i. Local Plan policy compliant alternative provision of equivalent community benefit is made available and will be appropriately laid out by the applicant as a replacement.
- ii. Sports and recreational facilities can best be retained and enhanced through the redevelopment of a small part of an overall site.
- iii. Locally (within the parish where it is located) there is an excess of public open space, children's play areas or sports pitch provision – the excess will be measured on the basis of a generic space type reference – e.g. grass area suitable for team sport – rather than a space for a specific sport.

New allotments and avoiding the loss of existing ones

- 1.828. Allotments are a valuable asset in promoting greater sustainability within local communities and are recognised as being of particular importance in urban areas, especially where individual gardens may be small in size.
- 1.829. The need for additional allotments depends on local factors. Given the likely costs of land acquisition and the limited financial resources available to the District Council any case made for additional allotments would need to be subject to very careful consideration. Proposals involving the development and thus resulting in the loss of allotments must have regard to considerations of demand and conveniently located alternative sites.

91. Policy – New allotments and avoiding the loss of existing ones

New allotments will be granted planning permission where they are well related to settlements and will avoid adverse environmental or amenity impacts.

Planning permission will not be granted for developments that would result in the loss of existing allotments unless at least one of the test set out below is satisfied:

- A development proposal will create a new provision that is equal to or better than that being lost: or
- There is a demonstrable over-supply in a locality (need to define what we mean by locality).

Justification for inclusion of policy

1.830. Allotments form a valued community asset and are increasingly important to many local communities and people. Demand for allotments has risen over recent years with waiting lists frequently becoming longer.

Sport and recreation facilities in the countryside

- 1.831. The changing nature of agriculture and the need for rural diversification has focused attention on alternative uses of land within the countryside. In this respect the provision of outdoor recreation facilities is of particular relevance. This type of development can have a significant visual impact on the character of the landscape and the surrounding countryside. It is also acknowledged that proposals can provide opportunities to improve the environment and to create wildlife habitats.
- 1.832. Some uses, such as horse riding, will be encouraged where they can be accommodated safely and are not detrimental to the countryside but their associated services and paraphernalia will need to be controlled. Dwellings in the open countryside will not be justified on the basis of a recreational need.

92. Policy – leisure and recreation developments in the countryside

Planning permission will be granted for outdoor recreation facilities in the countryside and on the coast provided that the nature of the activities undertaken or the space requirements of the proposal require a countryside or coastal location and all of the following tests are met:

- i. The facilities or development proposals are in scale with the character, environmental characteristics and setting of the area and do not conflict with countryside, nature or landscape policies, nor detract from the amenities of the area.
- ii. The proposals allow for safe access and discreet parking arrangements, particularly in environmentally sensitive areas, and do not result in the loss of or cause unacceptable disruption to existing public rights of way.
- iii. On site facilities are appropriate to meet the needs of the proposal and links with adjacent footpaths and bridleways should be suited to any proposed site uses.

The clear policy expectation is that low impact uses only will be accommodated and such uses should be countryside related activities

Any building work should be small scale and subservient to wider site use and where possible existing building reuse rather than new development should take place,

Any new buildings and necessary extensions should be limited in scale and be in close proximity to existing groups of buildings or an existing settlement.

Where it is proposed to extend or intensify an existing use the proposals and any net cumulative additional impacts will be considered in the context of and be required to be compatible with all of the above.

Justification for inclusion of policy

1.833. Many leisure activities, especially of a low key or informal nature, take place in countryside locations and away from settlements. Often such activities don't take place in places or use facilities that have been developed (that is not developed in the planning sense and in terms of where planning permission may be or have been required). However proposals for commercial or other leisure facilities often associated with tourism attractions or accommodation sites may come forward for development.

15. Our outstanding historic environment

1.834. A heritage asset is defined by central government in the NPPF as:

“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).”

- 1.835. East Devon is fortunate in having a rich heritage and distinctive vernacular architecture which makes it a unique place to live in and visit. Local materials such as chert, cob, thatch and clay tiles are used extensively as well as local limestone and Beer stone. East Devon’s historic environment isn’t just limited to man-made buildings, monuments, standing stones and archaeological sites, but landscapes and wildlife habitats resulting from millennia of human interaction with nature.
- 1.836. National policy emphasises the importance of heritage assets for their contribution to quality of life, and as an irreplaceable resource which should be conserved in a manner appropriate to their significance. Local planning authorities are required to set out in their plans, “a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats” and to make information on the historic environment, gathered as a part of policy-making or development management, publically accessible. Policy implementation will be informed by the East Devon Heritage Strategy, which presents a summary of the District’s heritage, its significance and its benefits whilst developing objectives for the future, with an action plan for the delivery of recommendations. The strategy runs for 12 years from 2019 – 2031 and will be updated during the life of the local plan. The strategy focuses on the heritage assets of the district where the Council has a direct role and responsibility, or influence, in the decision making or management process. However broader designations that inform the strategy are also considered, such as the Areas of Outstanding Natural Beauty, which have a positive influence on the enhancement and management of the district’s heritage.
- 1.837. Non-designated heritage assets may be identified by a local planning authority as having a local heritage value that should be taken into account when considering any planning application that affects either the asset or its setting. National policy further advises that heritage assets should be conserved in a manner appropriate to their significance. In weighing an application that may affect a non-designated asset, a balanced judgement is required regarding the scale of any harm or loss and the significance of the asset.

93. Policy – Historic Environment

Proposals for new development that may affect heritage assets should take account of the desirability of sustaining and enhancing the significance of those assets and putting them to viable uses consistent with their conservation.

Particular encouragement will be given to schemes that will help secure the long term conservation of vacant and under-used buildings and bring them back into appropriate use. Heritage assets include statutorily designated Scheduled Monuments, Listed Buildings or structures, Conservation Areas, Registered Parks and Gardens, Registered Battlefields, archaeology of national and local interest and non-designated buildings, structures or historic landscapes that contribute to local historic and architectural interest of the district's historic environment, and also includes those heritage assets listed in the Devon Historic Environmental Record.

Proposals for new development must be sensitively designed and not cause harm to the historic environment. Proposals that have an impact on heritage assets (whether they are designated or non-designated) will only be supported where they:

- i) conserve or enhance the significance of the heritage asset and its setting. The more important (or significant) the heritage asset, the greater the weight that will be given to its conservation;
- ii) make a positive contribution to local character and distinctiveness (through high standards of design, reflecting its significance, including through the use of appropriate materials and construction techniques);
- iii) make a positive contribution towards wider public benefits;
- iv) provide a viable future use for a heritage asset that is consistent with the conservation of its significance; and/or
- v) protect a heritage asset that is currently at risk.

Non-designated heritage assets, where identified through local or neighbourhood plan-making, Conservation Area Appraisal or review or through the planning application process, will be recognised as heritage assets in accordance with national guidance and any local criteria. Development proposals that directly or indirectly affect the significance of a non-designated heritage asset will be determined with regard to the scale of any harm or loss and the significance of the asset.

Applicants will be required to describe, in line with best practice and relevant national guidance, the significance of any heritage assets affected including any contribution made by their setting. The level of detail should be proportionate to

the asset's importance. In some circumstances a planning condition will require further survey, analysis and/or recording.

Alterations to historic buildings, for example to improve energy efficiency or reduce carbon emissions, should respect the integrity of the historic environment and the character and significance of the building.

Justification for inclusion of policy

- 1.838. Heritage assets may be classified as either 'designated' or 'non-designated' and the importance of both can be taken into account through the planning process. Heritage assets can include Listed Buildings, Scheduled Monuments, Conservation Areas, Registered Parks and Gardens, archaeological sites and other assets. The majority of heritage assets in East Devon, whether buildings, archaeological sites or areas of historic landscape character, do not have a statutory designation and so their conservation relies on the planning system and positive management by land and property owners.
- 1.839. In preparing development proposals, applicants should refer at an early stage to sources of information on the historic environment such as The Devon Historic Environment Record, The National Heritage List for England, any local Heritage Impact Assessments, and, where relevant, Conservation Area Character Appraisals to ensure that proposals are based on an understanding of the significance of any heritage assets that may be affected. Development proposals should also accord with the Heritage Strategy, take into account the principles set out in any Supplementary Planning Documents and other relevant guidance.
- 1.840. In some circumstances, further surveys and analysis may be required prior to any application being determined. Heritage Statements, Statements of Significance, and Impact Assessments should be produced in line with current best practice and relevant national guidance.
- 1.841. The Council will monitor buildings or other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk through discussions with owners and willingness to consider positively development schemes that would ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers. The Council will work with relevant stakeholders to encourage better understanding of the heritage assets on the Historic England "Heritage at Risk" Register. Where appropriate the Council will encourage Heritage Partnership Agreements, particularly for Listed Buildings on any 'at risk' register.
- 1.842. The Council will support Neighbourhood Development Plans where they seek to assess their heritage assets and add to the evidence base.

94. Policy – Listed Buildings

1. Proposals for development, including change of use, that involve any alteration of, addition to or partial demolition of, a listed building or within the curtilage of, or affecting the setting of a listed building will be expected to:
 - i) conserve, enhance or better reveal those elements which contribute to the heritage significance and/or its setting;
 - ii) respect any features of special architectural or historic interest, including, where relevant, the historic curtilage or context, such as burgage plots, or its value within a group and/or its setting, such as the importance of a street frontage or traditional shopfronts; and
 - iii) be sympathetic to the listed building and its setting in terms of its siting, size, scale, height, alignment, materials, building methods and finishes (including colour and texture), design and form, in order to retain the special interest that justifies its designation
2. Development proposals affecting the significance of a listed building or its setting that will lead to substantial harm or total loss of significance will be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that demonstrably outweigh that harm or loss or where the applicant can demonstrate that:
 - i) the nature of the heritage asset prevents all reasonable uses of the site; and
 - ii) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - iii) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
 - iv) the harm or loss is outweighed by the benefit of bringing the site back into use.
3. Development proposals that would result in less than substantial harm to the significance of a listed building will be expected to:
 - i) minimise harm and avoid adverse impacts, and provide justification for any adverse impacts, harm or loss of significance;
 - ii) identify any demonstrable public benefits or exceptional circumstances in relation to the development proposed; and
 - iii) investigate and record changes or loss of fabric, features, objects or remains, both known and unknown, in a manner proportionate to the importance of the change or loss, and to make this information publicly accessible.
4. Changes of use will be supported where it can be demonstrated that the new use can be accommodated without any adverse effect on the significance of the building and its setting.

Justification for inclusion of policy

- 1.843. Within East Devon around 4600 buildings and structures are “listed” (included on a register known as the List of Buildings of Special Architectural or Historic Interest) due to their special architectural or historic interest at a national level. When a building or structure is listed, it is listed in its entirety, which means that both the exterior and the interior are protected which includes interior features and fabric such as staircases, panelling, roof structures, floors, walls, fireplaces, doors etc. In addition, any object or structure fixed to the building, and any object or structure within the curtilage of the building, which although not fixed to the building, forms part of the land and has done so since before 1 July 1948, are treated as being part of the listed building. Occasionally land will form part of the setting of a heritage asset despite lying some distance away, for example where there is a historical or functional association.
- 1.844. Many listed buildings, due to their age and construction, have features which could support roosting bats. To ensure compliance with relevant legislation, species survey information will be required, and ecological conditions applied to consents granted, in instances where proposed works to listed buildings would be reasonably likely to impact roosting bats.

95. Policy - Conservation Areas

1. Proposals for development within or affecting the setting of a Conservation Area must conserve or enhance its special interest, character, setting and appearance. Development will be expected to:

- i) contribute to the Conservation Area’s special interest and its relationship within its setting. The special characteristics of the Conservation Area (such as existing walls, buildings, trees, hedges, burgage plots, traditional shopfronts and signs, farm groups, medieval townscapes, archaeological features, historic routes etc.) should be preserved;
- ii) take into account important views within, into or out of the Conservation Area and show that these would be retained and unharmed;
- iii) respect the local character and distinctiveness of the Conservation Area in terms of the development’s: siting; size; scale; height; alignment; materials and finishes (including colour and texture); proportions; design; and form and should have regard to any relevant Conservation Area Character Appraisal;
- iv) be sympathetic to the original curtilage of buildings and pattern of development that forms part of the historic interest of the Conservation Area;
- v) be sympathetic to important spaces such as paddocks, greens, gardens and other gaps or spaces between buildings which make a positive contribution to the pattern of development in the Conservation Area;
- vi) ensure the wider social and environmental effects generated by the development are compatible with the existing character and appearance of the Conservation Area; and/or

vii) ensure no loss of, or harm to any building or feature that makes a positive contribution to the special interest, character or appearance of the Conservation Area.

2. Where a proposed development will lead to substantial harm to or total loss of significance of a Conservation Area, consent will only be granted where it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits that outweigh that harm or loss.

3. Where a development proposal will lead to less than substantial harm to the significance of a Conservation Area, this harm will be weighed against the public benefits of the proposal.

4. Wherever possible the sympathetic restoration and re-use of structures which make a positive contribution to the special interest, character or appearance of the Conservation Area will be encouraged to prevent harm through the cumulative loss of features which are an asset to the Conservation Area.

Justification for inclusion of policy

- 1.845. There are 33 Conservation Areas in East Devon, covering parts of all the main towns (except Cranbrook) and the historic cores of many smaller settlements. Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 describes Conservation Areas as “areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance”. Inevitably, these areas will vary greatly. Attractive groups of buildings, open spaces, trees and hedgerows, an historic settlement pattern, or features of archaeological interest, may all contribute to the special character of an area, and it is that character, rather than individual buildings, which Conservation Area legislation seeks to preserve and enhance. This does not mean that they cannot develop; change is often necessary to accommodate the demands of modern living as our historic towns and village centres are always likely to attract new development. Any development would, however need to preserve or enhance the character of the area and may require planning permission and/or planning permission for demolition in a conservation area.
- 1.846. A feature in some town centres are ‘burgage plots’. Surviving patterns of burgage plots have considerable historic and archaeological significance and contribute much to the character of the market towns, Honiton in particular.
- 1.847. When undertaking Conservation Area Appraisals the opportunity will be taken to produce and update lists of locally important non-designated heritage assets and

identification of any heritage assets 'at risk' in order to encourage better understanding.

96. Policy – Archaeology and Scheduled Monuments

1. Development must protect the site and setting of Scheduled Monuments or nationally important designated or undesignated archaeological remains, including ancient routeways and milestones.
2. Applicants will be expected to undertake an assessment of appropriate detail to determine whether the development site is likely to contain archaeological remains. Proposals must show how the development proposals have had regard to any such remains.
3. Where the assessment indicates archaeological remains on site, and development could disturb or adversely affect archaeological remains and/or their setting, applicants will be expected to:
 - i) submit an appropriate archaeological desk-based assessment; or
 - ii) undertake a field evaluation (conducted by a suitably qualified archaeological organisation), where necessary.
4. Nationally important archaeological remains (whether scheduled or demonstrably of equivalent significance) should be preserved in situ. Non-designated archaeological sites or deposits of significance equal to that of a nationally important monument will be assessed as though those sites or deposits are designated.
5. Where a proposed development will lead to substantial harm to or total loss of significance of such remains consent will only be permitted where it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
6. Where a development proposal will lead to less than substantial harm to the significance of such remains, this harm will be weighed against the public benefits of the proposal.
7. For other archaeological remains, the effect of a development proposal on the significance of the remains, either directly or indirectly, will be taken into account in determining the application.

8. In exceptional cases, where harm to or loss of significance to the asset is considered to be justified, the harm should be minimised, and mitigated by a programme of archaeological investigation, including excavation, recording and analysis. Planning permission will not be granted until this programme has been submitted to, and approved by, the Council and development should not commence until these works have been satisfactorily undertaken by an appropriately qualified organisation. The results and analysis of findings subsequent to the investigation should be published and made available to the relevant local and county authorities.

Justification for inclusion of policy

- 1.848. East Devon has a significant archaeological heritage which is a finite and non-renewable resource with great social, economic, cultural and educational value. Around 200 archaeological sites and monuments are designated as Scheduled Monuments and are legally protected under the terms of the Ancient Monuments and Archaeological Areas Act.
- 1.849. The Devon Historic Environment Record, maintained by the County Council, also includes numerous other sites of local interest but, due to their size, form and the large numbers added to the record annually, it is not practical for the Policies Map to identify them. The record is available for applicants to view.
- 1.850. A network of historic routes also exist as archaeological features in the district, ranging from pre-historic tracks, Roman roads, sunken lanes to later turnpike roads. These routes are integrated into the district's landscape and serve an important function in linking settlements and forming a unique setting for the district's distinctive landscape features and will therefore be protected.

97. Policy – Historic Landscapes, parks and gardens

1. Proposals should conserve or enhance the special historic interest, character or setting of a park or garden on the Historic England Register of Historic Parks and Gardens of Special Historic Interest in England.
2. Any harm to or loss of significance of any heritage asset requires clear and convincing justification. Substantial harm to or loss of these assets should be wholly exceptional in the case of Grade I and Grade II* Registered Historic Parks and Gardens and exceptional in the case of Grade II Registered Historic Parks and Gardens.
3. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, consent will only be granted where it can be demonstrated that the substantial harm or loss is necessary to achieve

substantial public benefits that outweigh that harm or loss. All other options for their conservation or use must have been explored.

4. A balanced judgment, having regard to the scale of any harm or loss and the significance of the heritage asset, will be required in assessing proposals affecting non-designated historic parks and historic landscapes (including historic routes and battlefields).

5. Applicants will be required to describe, in line with best practice and relevant national guidance, the significance of any heritage assets affected including any contribution made by their setting. The level of detail should be proportionate to the asset's importance. In some circumstances planning conditions will require further survey, analysis and recording.

Justification for inclusion of policy

- 1.851. Historic landscapes, parks and gardens are an important part of East Devon's heritage and environment. They comprise a variety of features including the open space itself, views in and out, archaeological remains and, in the case of parks or gardens, a conscious design incorporating planting and water features, and frequently buildings. Historic landscapes are also important for their green infrastructure and biodiversity value. There is a need to protect such sites and their settings and to encourage sympathetic management wherever possible.
- 1.852. The most important sites have been included on the "Historic England Register of Historic Parks and Gardens of Special Historic Interest in England" and/or on the National Heritage List for England. In addition to the nationally important registered sites the district has several other sites of regional or local importance that should also be protected from harm, and enhanced where possible.

16. Ensuring we have community buildings and facilities

- 1.853. Thriving communities are reliant on having spaces and buildings to meet and for community based activities to take place. Without such spaces many communities would not survive and would not provide the support mechanisms that are needed for the health and wellbeing of their residents.

98. Policy – new or extended community facilities

Planning permission for new community spaces and buildings will only be granted where all of the tests set out below are satisfied:

- Provision must be within or adjoining or physically closely and well related the built up areas or edges of a settlement or new development at that settlement or proposed under plan policy or land allocation.
- Development will be designed to serve a local community need and will be proportionate to the needs of that community.
- Where possible development proposals should promote the sharing of spaces and facilities with a range of uses and activities?

Justification for inclusion of policy

- 1.854. Facilities such as schools, libraries, halls, health and sports centres and Places of Worship fulfil an important role as a focus for social activities taking place in the local community. Community centres and village halls are already established in many settlements in East Devon, and where appropriately sited or proposed the Council will encourage the expansion of or new provision of these types of uses.
- 1.855. It is essential that in areas where substantial new development is proposed, and in areas lacking facilities, that provision be made for community and education facilities. Consideration should be given to the establishment of multi-purpose buildings that accommodate a variety of uses and users. Examples include Post Office, cyber-cafe, health visitor, playgroup, facilities for the elderly and a range of clubs and societies. The definition of community facilities does not include residential development, either in isolation or as a means of providing community facilities.
- 1.856. The Council will encourage the temporary use of a residential house or other appropriate building for community activities in the following instances:
- Where there is a perceived demand which needs to be proven prior to the construction of a permanent community facility.

- Where a large development is proposed and a building is required to encourage an embryonic community facility to establish at an early stage of construction. In this case the developer will be required to make the provision.

1.857. The Council will not permit the construction of a new residential house to be used temporarily for community purposes, where a residential use would conflict with other policies of the Local Plan. An instance of this is outside Built-up Area Boundaries, within open countryside. Any planning permission for new community facilities may be granted on a temporary basis. It may limit the type of activity carried out in the building and/or the hours of operation.

Loss of community facilities

1.858. Given the importance of existing community facilities it is seen as essential that we seek to retain existing facilities and avoid their loss to other forms of development.

99. Policy – Loss of community facilities

Planning Permission will not be granted for developments that would result in the loss or closure of a community facility unless at least one of the tests set out below is met:

- the community facility is no longer needed or is not viable;
- an alternative facility of equal or higher value is being provided.

Justification for inclusion of policy

1.859. Policy of the local plan will resist the loss of community facilities unless they are clearly not needed, not used or surplus to requirements.

17. Implementation and monitoring of the local plan

Infrastructure provision

- 1.860. The delivery of infrastructure alongside housing and economic development is vital in creating sustainable communities. Transport, flood risk measures, utilities connections, and habitat mitigation are often critical to allow new development to take place; whilst people should be able to access facilities such as education, health, open space and play areas on a day-to-day basis.
- 1.861. Infrastructure can be funded and delivered in a variety of ways. New development is required to address its direct impacts by directly providing infrastructure or paying for it, through planning obligations, also known as section 106 agreements and where relevant under legal agreements for highway works. Under legislation there are specific tests that need to be met. The council also charges Community Infrastructure Levy, which is collected when new homes are built and put into a 'pot' for future infrastructure projects. Sometimes grants or loans to fund infrastructure from national or local government may become available. Infrastructure may also be funded by organisations that have statutory powers and funding drawn from charges to customers (e.g. utilities companies), or central Government (e.g. works to protect existing development from flooding).
- 1.862. As local plan making progresses we will need to undertake detailed assessment of infrastructure needs and how we plan for provision.

Monitoring

- 1.863. It is essential that the Local Plan is capable of being delivered and isn't just a wish list of proposals that have little chance of being implemented. Every policy in this Local Plan recognises that there is an issue or consideration to which the council needs to respond. Accordingly, for each policy the council needs to set out the intended outcomes for its implementation, and how the policy's success can be measured.
- 1.864. Monitoring is a key means to assessing the success of any given policy. To ensure this is the case, each year the council will produce a series of report which, in total, will comprise its statutory Annual Monitoring Report.
- 1.865. These will include, but not be limited to, the following documents:

Housing Monitoring Update (HMU)

1.866. The NPPF states that “to maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission”; this report will include housing completions figures for the previous 12 months, including:

- Total net completions district wide (including by parish, settlement and Built-up Area);
- Breakdown of completions on brownfield and greenfield sites;
- Affordable housing.

1.867. The NPPF also stipulates that “local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies”. Therefore the HMU will also include:

- Housing projections and a trajectory for the Local Plan period;
- Five Year Housing Land Supply calculations (for the western side of East Devon, the rest of East Devon and the district as a whole);
- Housing Delivery Test results.

Employment Land Review (ELR)

1.868. This report will provide an assessment of employment land availability at a given point each year in East Devon. It will identify the major employment sites and business parks in the district and within these employment areas record and highlight:

- Plots of land and building floorspace that has been developed;
- Vacant or undeveloped plots of land that could be suitable for future business development.

1.869. The ELR will also include:

- A district wide analysis of Non Domestic Rated (NDR) and Vacant NDR units at employment sites, commenting on identified uses of units, numbers and distribution across the district;
- Information on wage levels;
- Unemployment rates;
- Employee/job numbers.

Self and Custom-Build Demand and Supply monitoring report

1.870. This report will set out both the demand for self-build in East Devon, as shown by the numbers on the council’s self-build register, and the supply of self-build plots in the district, assessed by the number granted planning permission throughout the year.

Brownfield Land Register

- 1.871. The NPPF requires the council to encourage the effective use of land within settlements by reusing land that has been previously developed (brownfield land).
- 1.872. Since December 2017, the council has been legally required to prepare, maintain and publish a brownfield land register of sites. Registers help builders to identify potentially suitable brownfield sites for housing development, whilst data on sites is 'harvested' nationally.
- 1.873. To be included on the register, sites must be:
- Suitable for residential development, in accordance with policies in the adopted Local Plan and the NPPF;
 - Free from adverse impacts on the natural environment, habitats or built heritage that cannot be mitigated;
 - Viable and capable of being delivered within 5 years;
 - At least 0.25 hectares in size or capable of supporting five or more dwellings;
 - Available for residential development (meaning that there is no impediment to development in terms of either ownership issues or legal constraints on the land).

Additional monitoring

- 1.874. Other areas that will require monitoring include:
- Section 106 / CIL Developer Contributions;
 - Heritage Strategy;
 - Gypsy and Traveller Sites;
 - Neighbourhood Plans;
 - Planning Appeals.

18. Have we missed anything?

- 1.875. In this draft plan we have tried to cover all of the key matters that come up on a reasonably regular basis and that need to be addressed through planning policy. We cannot, however, be expected to cover every single possible issues or matter or every single type or form of development that might be proposed, to do so would make the plan far too long and complicated. Very occasionally, therefore there may be planning applications that need to be determined where there is no direct or limited direct policy coverage. In such cases applications may need to be determined on the basis of what policy there is and also a balanced judgment of relevant factors that apply to a proposal and other material considerations that can be drawn on.
- 1.876. We would, however, welcome your thoughts on any matters that you think we have failed to address and which are of sufficient importance to need inclusion of a policy in the plan.

DRAFT