

Agenda for Strategic Planning Committee

Monday 6 November 2017, 10am



[Members of the Strategic Planning Committee](#)

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

[View directions](#)

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- 1 [Public speaking](#)
- 2 Minutes of the Strategic Planning Committee meeting held on 11 July 2017 (pages 3 - 8)
- 3 Apologies
- 4 Declarations of interest - Guidance is available online to Councillors and co-opted members on making [declarations of interest](#).
- 5 [Matters of urgency](#) – none identified
- 6 To agree any items to be dealt with after the public (including press) have been excluded. There are no items that officers recommend should be dealt with in this way.
- 7 Community Infrastructure Levy Working Party minutes, 8 September 2017 – Committee to note (pages 9 - 12)

Matters for Debate

- 8 **Cranbrook Plan Development Plan Document** (pages 13 - 30)
The report seeks Members approval for the publication of the [Cranbrook Development Plan Document Preferred Approach](#) for consultation. The document proposed is available from the link above, separated from this agenda due to its size.
- 9 **Proposed response to Government document – Planning for the right homes in the right places: consultation proposals** (pages 31 - 67)
The report provides a proposed response to a Government document called - Planning for the right homes in the right places: consultation proposals.
- 10 **Infrastructure Delivery Plan – review 2017** (pages 68 - 162)
The report outlines the findings of the Infrastructure Delivery Plan – Review 2017, updating the previous study that was published in March 2015. .

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[Decision making and equalities](#)

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EAST DEVON DISTRICT COUNCIL

Minutes of a meeting of the Strategic Planning Committee held at Knowle, Sidmouth on 11 July 2017

Attendance list at end of document

The meeting started at 10.00am and ended at 11.32 pm.

***1 Public speaking**

The Chairman welcomed everyone present to the meeting. There were no members of the public that wished to speak.

***2 Minutes**

The minutes of the Strategic Planning Committee meeting held on 29 March 2017 were confirmed and signed as a true record.

***3 Declarations of interest**

Cllr Jill Elson; Minute 7 – Community Infrastructure Levy – Payment in kind policy
Interest - Personal
Reason: Chair of Governor's, Exmouth Community College

Cllr Phil Twiss; Minute 7 – Community Infrastructure Levy – Payment in kind policy
Interest - Personal
Reason: School Governor

Cllr Phil Twiss; Minute 8 – Employment land review report
Interest - Personal
Reason: Brother is a Partner at Clarke Willmott Solicitors (Taunton)

Cllr Philip Skinner; Minute 8 – Employment land review report
Interest - Personal
Reason: Shareholder representative – Exeter Science Park and close friends with the owners of Greendale Business Park

4 East Devon Local Development Scheme – July 2017

The Committee considered the Service Lead's – Strategic Planning and Development Management report detailing an updated Local Development Scheme and setting out the timetable for future planning policy production in East Devon.

Members noted the following:

- The Villages Plans had now been submitted to the planning inspector for examination. It was hoped that the Plan would formally be adopted later in the year/early next year.
- The Greater Exeter Strategic Plan was progressing with a team now established – this included two members of the Planning Policy Team who had been seconded. A draft Strategic Plan was anticipated before the end of the year.
- There were currently 30 Neighbourhood Plans in production. This was a large piece of work, which required a lot of resource to support and enable those producing the Plans.

- A consultant had now been appointed to carry out work on a revised Charging Schedule. The same consultants were also undertaking viability work for Cranbrook.

Points raised during discussion on the Local Development Scheme included:

- The importance of progressing the Greater Exeter Strategic Plan to ensure economic prosperity for the district. Some concern was raised that planning applications would be received in advance of the Strategic Plan being adopted due to slow progress with Plan production. In response the Chief Executive advised that the Council was currently in a strong position having an up to date Local Plan and five year land supply and therefore any applications would be assessed against the Council's adopted policies;
- Concerns raised about delays in the production of the Gypsy and Traveller Plan. In response the Service Lead advised that unfortunately a 'call for sites' had been unsuccessful and Officers were now trying to secure sites on the open market – if this was successful there would not be a need for a Gypsy and Traveller Plan. If and when a suitable site(s) was found a report would be presented to Members for their approval. If land could not be secured on the open market, the next stage would be to look at sites that had come through the HELAA process. A site would need to have strong policy support in order for the Council to pursue a compulsory purchase order to secure the land. Members were advised that sites would be allocated in Cranbrook through the Cranbrook Plan.
- The membership of the CIL Working Party had now been agreed and the first meeting was due to take place at the end of the summer. Officers were currently working on a mechanism for assessing bids against the CIL funding pot.
- It was felt that Strategy 36 in the Local Plan, relating to accessible homes, was not being adhered to in the planning process and it was suggested that a supplementary planning document be introduced to provide the necessary detail. In response, the Service Lead advised that he would look into the matter and update at the next meeting.
- Disappointment that parishes were losing out on significant sums of CIL money due to self-build properties being exempt from making a contribution. In response, the Service Lead acknowledged the frustration, however advised that the exemption had been written into the legislation and therefore was not something that the Council could amend. An announcement on the review of CIL was anticipated with the autumn statement.

RECOMMENDATION: that Council adopts the East Devon Local Development Scheme, appended to the committee report, from 27 July 2017.

***5 Local Development Orders within Enterprise Zone**

The Enterprise Zone Programme Manager presented a report updating the Committee on the proposed work programme for the delivery of Local Development Orders (LDOs) within the Enterprise Zone. The LDOs were intended to provide a more simplified planning process, which would enable development to progress more quickly; LDOs were frequently used on employment sites. Members noted that there were a number of examples of Council's that had adopted LDOs which ranged from requiring no planning permission to requiring prior notification. The Council would

need to follow a statutory process in order to adopt the LDO – this would include consultation and engagement with Members, key stakeholders and landowners. A timetable for this work, which would take approximately nine months, was set out in the committee report.

Responses to comments made during discussion included:

- Any development would still be subject to building control conditions and checks;
- A briefing note, including map, on the Enterprise Zone would be circulated to Members;
- A consultant would be appointed by the Officer Working Group to advise on developing and adopting an Order;
- Members would receive a report in December 2017 on recommendations on the type of LDO the Council should adopt and then a final report in April 2018 on the proposed LDO for adoption;
- Devon County Council were aware and were being kept informed of progress of the LDO;
- The LDO process did not prevent any business from re-locating to the Enterprise Zone area whilst it was in production;
- Regular enquiries were being received from businesses wishing to locate/re-locate into the Enterprise Zone area, which was encouraging.

RESOLVED:

1. that the proposed Officer Working Group for delivery of the Local Development Orders with Development Management, Major Projects, Planning Policy and Enterprise Zone Officers be endorsed;
2. that the commencement of work on the Local Development Order for the Exeter Science Park site be approved;
3. that the Enterprise Zone Programme Manager circulate a briefing note, including map, on the Enterprise Zone to the Committee.

***6 Planning appeals status report**

The Service Lead – Strategic Planning and Development Management presented the report providing an update on the current situation regarding planning appeal decisions and an overview of the results of planning appeals from 1 April 2016 to March 2017. Members noted that although the Council had achieved an appeal success rate close to the national average, the figures for the last twelve months represented a considerable drop in the number of appeals dismissed when compared to the Council's performance over the past three years, where the success rate had been consistently above the national average.

The Service Lead advised that there had been no significant change in policy over the past twelve months which could be attributed to the drop in the Council's success rate. However, there had appeared to be a change in the decisions of the Inspectorate being more positive and pro-development unless there was significant harm and where there was economic benefit. He also advised that there had been a high proportion of officer overturns at Development Management Committee, which had impacted on performance. Members also noted that the Council could not make split-decisions on applications, which the Inspectorate were able to do. Importantly, no costs had been awarded against the Council, which suggested that none of the Council's decisions had been considered unreasonable. Appeal decisions would continue to be monitored and learnt from.

Discussion on the report included:

- Officer reports were there to guide the Development Management Committee, however Members were entitled to come to a different view having listened to all parties – this was the purpose of the Committee;
- Planning was largely down to interpretation;
- Queried whether the figures had been broken down to show the number of retrospective overturns – it was noted that the Committee often struggled to set the fact that it was retrospective aside. The Service Lead advised that he would look into this;
- Unfortunate that the Council could not make split decisions. The Service Lead advised that this would require a change to the legislation;
- Officers needed to be clearer in their reports on the weight given to policies;
- The Council was still on target with the national average and therefore there was no concern, particularly as there no costs had been made against the Council for being unreasonable;
- The Development Management Committee received regular training to improve their planning knowledge;
- Would be helpful for the report to be presented to the Development Management Committee as the decision makers on applications.

RESOLVED: that the planning appeals status report for the year from 1 April 2016 to 31 March 2017 be noted.

7 Community Infrastructure Levy – Payment in kind policy

The Service Lead – Strategic Planning and Development Management presented a report outlining a draft policy which had been produced to enable Community Infrastructure Levy to be paid ‘in kind’ by land and/or infrastructure, rather than cash. Members noted that it was not envisaged that the policy would be used very often; however, there would situations where it was beneficial.

During discussion Members supported the principle of the policy and recognised that it provided another option, however considered that further work was required, particularly in respect of how payments were made to parish and town councils.

RECOMMENDATION: that Council approves the Community Infrastructure Levy payment in kind policy with effect from 27 July 2017.

***8 Employment Land Monitoring Review report**

The Service Lead – Strategic Planning and Development Management presented a report summarising the employment land review undertaken for 2015-16 and 2016-17. The Council was required to undertake this monitoring exercise in order to understand the provision and delivery of employment land in the district and thereby ensure that plan policies were based upon adequate, up to date and relevant evidence. The detailed monitoring report was appended to the Committee report.

Members noted that the information gathered would be used to inform a strategy for the future delivery of employment land in the district and the resources to assist this. A further report would be prepared with the Economic Development Team to provide an action plan for supporting delivery of employment land in the district for the Committee’s consideration.

Members were also asked to note the Cushman and Wakefield report, produced by consultants on behalf of the Science Park Company and appended to the committee report, which highlighted a significant issue affecting delivery at the Exeter Science Park. The report detailed proposals for a land swap between land currently forming the north eastern corner of the Science Park and land to the south west, which lies outside the Science Park designation. The proposal was for land currently within the Science Park to be brought forward for housing and the Science Park boundary to be extended to include land to the south west to compensate for the loss. Correspondence with officers, which detailed the issues and implications, were also appended to the committee report for information. Ultimately, any application would need go through the Development Management Committee for decision as the application would result in a departure from the Local Plan.

Discussion on the employment land review and proposed land swap included:

- Employment land review report was welcomed;
- There was a need to understand the type of employment buildings required;
- Employment land should be being monitored against the Council's objective of one job:one home provision;
- The proposed land swap was critical to enable delivery at the Science Park to move forward;
- Understanding that there was an economic benefit from the land swap, however concern that 3.5 hectares of employment land was being lost;
- Some concern raised about 25% affordable housing being proposed as part of the land swap (should be 50%) – justification for the reduction was not clear. Some Members felt 25% affordable housing was preferable to none. In response it was advised that this would be a matter Development Management Committee would need to consider when determining any application;
- The economic and viability case for the land swap/housing provision needed to be made clear in the Development Management Committee report.

The Chairman of the Development Management Committee made clear that Development Management Committee Members would need to approach the application with an open mind and determine any application based on the facts presented to them.

RESOLVED:

1. that the Employment Land Monitoring Review report for 2015-16 and 2016-17 be noted;
2. that the appendix to the committee report from Cushman and Wakefield detailing a proposed land swap at Exeter Science Park and the implications of this proposal be noted;
3. that a further report detailing an action plan for the delivery of employment land in the district be presented at a future meeting.

Attendance list

Committee Members:

Councillors

Phil Twiss - Chairman

Graham Godbeer – Vice Chairman

Mike Allen

Susie Bond

Colin Brown

Jill Elson

Mike Howe

Geoff Jung

Rob Longhurst

Philip Skinner

Brenda Taylor

Mark Williamson

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

Councillors

Peter Faithfull

Andrew Moulding

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

Mark Williams, Chief Executive

Ed Freeman, Service Lead – Strategic Planning and Development Management

Naomi Harnett, Enterprise Zone Programme Manager

Shirley Shaw, Planning Barrister

Hannah Whitfield, Democratic Services Officer

Apologies

Committee Members:

Ian Hall

Geoff Pook

Non-committee Members:

Paul Diviani

David Key

Chairman Date.....

EAST DEVON DISTRICT COUNCIL

Community Infrastructure Levy Working Party minutes 8 September 2017

Attendance list at end of document

The meeting started at 1.30pm and ended at 2.40pm.

1 Election of Chairman

Cllr Graham Godbeer proposed, seconded by Cllr Susie Bond, that Cllr Mike Howe be elected Chairman of the Working Party.

2 Declarations of interest

Cllr Jill Elson

Interest - Personal

Reason: Chair of Governor's, Exmouth Community College

3 Overview of Community Infrastructure Levy (CIL)

As part of the Working Party agenda papers the Service Lead – Strategic Planning and Development Management had provided a detailed overview of CIL in East Devon, which included a background to CIL, how it worked and how much the Council had to spend.

The Council had started charging CIL from 1 September 2016 and from this date all approved dwellings across the district and retail development outside town centres were liable to pay CIL, subject to not falling within one of the exemption categories (such as 'self builders' and affordable housing). CIL contributions collected are to be used to part fund the 'Regulation 123' list of infrastructure. The Working Party noted that there were obvious funding gaps - these had previously been reported to the Strategic Planning Committee and were outlined in the Working Party papers.

The total income from CIL up to the end of the Local Plan period (2031) was estimated to be £40.6m. However 5% of this would be retained for administration costs, 25% would be passed to town/parish councils with a made Neighbourhood Plan (15% otherwise), and approximately 12% would need to be spent on habitat mitigation measures (the cost of these measures were currently been recalculated and would be represented to Strategic Planning Committee by the end of the year). This would leave approximately £25.5m for other infrastructure projects – this fell a long way short from the total infrastructure cost which the Infrastructure Delivery Plan identified to be £251.1m to deliver the Local Plan.

The Working Party noted the current position regarding income and liabilities – however it was stressed that these figures were constantly changing as further consents were granted and liability notices were issued. The Working Party would need to consider whether to make recommendations regarding commitments to spend what was currently available in the CIL pot and what, if any, commitments should be made regarding spend in future years.

Discussion on the overview report included:

- Clarification regarding habitat mitigation measures - these measures were set out within the adopted Habitat Mitigation Strategy and covered on-site and off-site mitigation measures, such as SANGS and the provision of wardens. CIL

only funded those measures that were classed as infrastructure. Non-infrastructure contributions are collected under separate legal undertakings. Exeter City Council, and Teignbridge District Council also collect funds towards the delivery of the Strategy.

- The Council had no control over how parish/town councils in receipt of CIL monies should spend it, however it was hoped the parish/town councils would work with the District Council as if spent incorrectly the funds could be claimed back. Funds were released every 6 months, therefore the amounts received so far were minimal (any funds received must be spent within 5 years). The infrastructure must be required as a result of the additional development.
- Concerns were raised regarding the need for schools to expand to accommodate new development, however DCC are not pursuing these projects in the absence of any commitments from EDDC to match fund projects using CIL receipts.. In response, Members were advised that officers were aware of the issues, however there were limited funds available and the Working Group would need to make recommendations as to how the current income would be spent and consider forward funding in order to enable infrastructure to come forward. Members were advised that any forward funding would have to come out of the capital programme and be repaid through future CIL receipts as we are unable to borrow against future CIL receipts under the legislation.
- CIL contributions are a legal requirement and a phased payment scheme has been used to collect contributions from developments thereby minimising the upfront cost to developers.
- Queried whether the reduced build rate at Cranbrook would affect CIL income. In response, it was advised that CIL only applied to approvals gained after 1 September 2016, therefore the majority of the approvals at Cranbrook were covered by Section 106 Agreements. The expansion areas would be covered by CIL, however this was currently under review.
- The CIL Charging Schedule was confirmed as being index linked albeit this only applies from the date of implementation. The charging schedule had been formulated nearly 2 years prior to this date and could not be index linked during the examination period and so in real terms we are not charging what was envisaged. This is a further reason for the current review of the charging schedule.
- Clarification sought on the Government's review of CIL - Members were advised that an announcement was expected in the Autumn Statement. A review had been undertaken and it had been recommended that a new system be implemented. However, any new system would need to be consulted on and new regulations passed, therefore this would not be introduced imminently.
- Developers would prefer to deliver the infrastructure needs themselves as they could deliver at a much cheaper cost.
- There was no appeal process on the Council's decision not to prioritise a bid. The Council's decision on which bids for CIL funding are supported is final. It was recognised that Members would have some tough decisions to make.

4 Timeline for determining spend and tying in with the budget setting process

The Working Party noted the timeline in the agenda papers.

5 Funding decision protocol and application for funding form

The Working Party noted that the Council had published a protocol outlining the process of how CIL would be spent and to ensure the decision making process was as transparent as possible. Guidance had also been provided explaining how the Council would be inviting bids and how they would be considered.

The CIL application for funding form had been published and sent to a range of infrastructure delivery partners, District Councillors and all town/parish councils. A press release had been issued. Infrastructure Delivery Partners and stakeholders had been given a deadline of 22 September to submit their funding bid.

A draft criteria for assessing bids and the funding assessment form were presented to the Working Party for consideration.

RESOLVED:

1. that the scoring assessment criteria for assessing CIL funding bids, as set out in the Working Party agenda papers, be agreed;
2. that only funding bids scoring 50 points or more based on the scoring criteria be presented for consideration by Members. In the event of less than 10 bids scoring more than 50, the top 25% of all bids received be presented.

6 Discussion of spend strategy and options

The Working Party considered a paper seeking guidance from Members on a strategy for how CIL should be spent. To help provide some context the paper included examples of CIL spend by other authorities and a detailed breakdown of spend by Teignbridge and Exeter City Councils.

There were felt to be three options available:

1. Commit to spend nothing at this stage and wait for more CIL income to accrue before committing to spend;
2. Commit to spend only what has been received in CIL income;
3. Make commitments to spend beyond what has currently been received in CIL income and request that these be supported through the Capital Programme. This option presented sub-options in terms of how much the Working Party were willing to recommend was committed and how far into the future the Working Party was willing to look.

Points raised during discussion included:

- The need to be mindful of the implications on larger projects if the council spends all CIL income on smaller projects.
- CIL contributions would be pooled for cross-boundary infrastructure.
- The larger infrastructure projects would allow for more development, which would bring in more CIL receipts.
- Larger projects would need to be match funded.
- Up to date CIL income and liabilities would be presented at each Working Party meeting – suggested that it would be helpful to have a breakdown of liabilities for the next two years.
- The CIL liability sits with the land not the developer.

- Current phased payment scheme was recognised as being generous and would be reviewed as part of the review of the CIL Charging Schedule being undertaken by appointed consultants. It was hoped a report would be presented to Strategic Planning Committee later in the year.

RESOLVED: that the Working Party are minded to make commitments to spend beyond what has currently been received in CIL income and request that these be supported through the Capital Programme.

7 Date of next meeting

The date of the next meeting would be set once the final number of funding bids received was known – likely to be end of October.

Attendance list

Working Party Members:

Councillors
Cllr Mike Howe (Chairman)
Cllr Susie Bond
Cllr Colin Brown
Cllr Graham Godbeer
Cllr Brenda Taylor

Also present:

Cllr Brian Bailey
Cllr Jill Elson
Cllr Bruce de Saram

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

Ed Freeman, Service Lead – Strategic Planning and Development Management
Henry Gordon Lennox, Strategic Lead – Governance and Licensing
Keith Lane, Planning Policy Officer
Sulina Tallack, Section 106 Officer
Hannah Whitfield, Democratic Services Officer

Apologies

Non-Working Party Members:

Cllr Andrew Moulding
Cllr Tom Wright

Chairman Date.....

Report to: **Strategic Planning Committee**

Date of Meeting: 6 November 2017

Public Document: Yes

Exemption: None

Review date for release None

Agenda item: 7

Subject: **Cranbrook Plan Development Plan Document**

Purpose of report: The report seeks Members approval for the publication of the [Cranbrook Development Plan Document Preferred Approach](#) for consultation.

Recommendation: **That Members agree to the commencement of consultation on the appended Preferred Approach document together with the publication of the associated Sustainability Appraisal and Strategic Environmental Assessment and background evidence documents.**

Reason for recommendation: To allow a key step in the production of a Development Plan Document to guide the expansion of Cranbrook to around 8,000 homes to be progressed.

Officer: Ed Freeman, Strategic Lead Planning Strategy and Development Management, 01395 517519

Financial implications: No direct financial implications

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

Equalities impact: High Impact

The Development Plan document will need to ensure that the needs of all groups and sections of society are considered and catered for, including Gypsies and Travellers.

Risk: Medium Risk

The expansion of Cranbrook to circa 8,000 homes represents the single largest contribution to meeting the strategic housing requirement in the District. It is vital that this comes forward on a comprehensive basis. The Cranbrook Development Plan document is identified in the Local Plan as being critical to securing the long term success of Cranbrook.

Links to background information:

- Issues and Options report
<http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/issues-and-options-consultation/#article-content>
- Cranbrook Plan evidence base
<http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-preferred-approach-evidence-base/#article-content>



Link to Council Plan: Encouraging communities to be outstanding, developing an outstanding local economy, delivering and promoting our outstanding environment.

1 Background

Outline planning permission for the first 2,900 homes at Cranbrook was issued in October 2010 followed shortly by the reserved matters for the first 1100 homes in April 2011. Development commenced in June 2011 and progress since then has been rapid. Particular milestones have included:

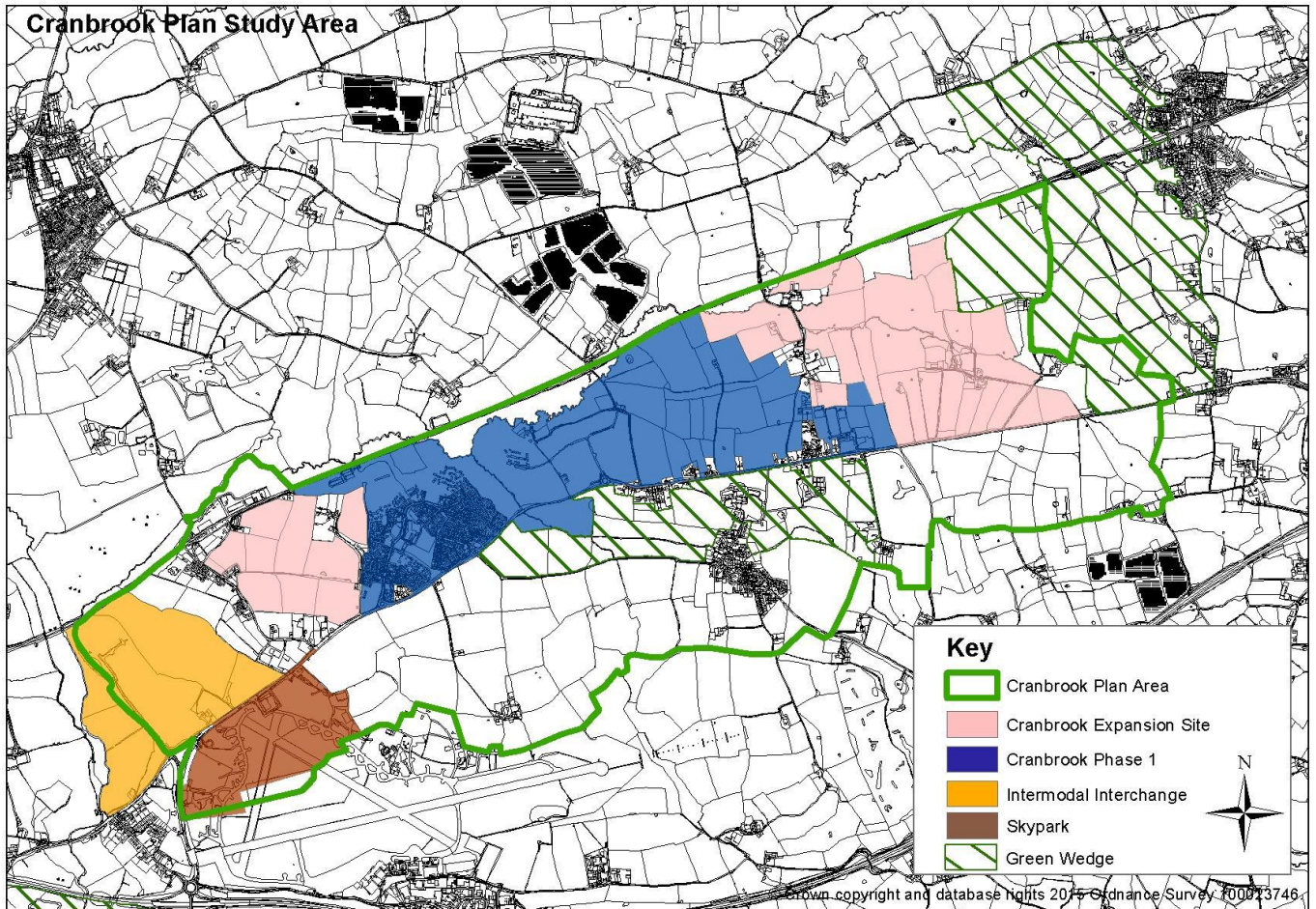
- The first households moving in during July 2012
- The opening of the first primary school (St Martin's) in September 2012
- The start of the bus service in May 2013
- Elections to the newly formed Cranbrook Town Council in May 2015
- The opening of the new education campus (including the second primary school and first secondary school) and the first shop in September 2015
- The commencement of rail services from Cranbrook station in December 2015
- The opening of the Cranberry Farm pub in the town centre in May 2017

Today there are almost 1,600 households living at Cranbrook, equivalent to a population of around 3,700 people. The town has been given Healthy New Town status (one of only ten such developments in England) as part of an NHS England programme and demonstrates that Cranbrook has a national profile.

2 Local Plan

The Local Plan anticipates Cranbrook comprising 7,850 new homes by 2031. This equates to a population of around 20,000 people meaning that Cranbrook will have quickly expanded to become the second largest town in the District. Accommodating a further 4,350 homes at Cranbrook over and above what currently has the benefit of planning permission represents the single largest contribution to meeting the strategic housing requirement in the District.

The plan below shows the area that currently has the benefit of planning permission (shown in blue as Cranbrook phase 1) and the two areas (in pink to the east and to the west) that are allocated for development. Strategy 12 of the Local Plan states that a further 1,550 homes and associated jobs and community infrastructure will be accommodated within the Cranbrook Plan area but outside the designation Neighbourhood Plan Areas of Rockbeare, Broadclyst and Clyst Honiton.



2 Cranbrook Plan to date

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

In June and July 2016 an issues and options public consultation was held in relation to the Cranbrook Plan. The consultation responses highlighted that minimising impact upon surrounding communities, noise on proposed residents and returning London Road to being a focus for commercial development are all important factors to the public. The two favoured development scenarios both involved some development south of the London Road (B3174), including development to the north east of Rockbeare.

3 Preferred Approach document

The [preferred approach document](#) proposed to go out to public consultation is intended to be accessible to the public as a whole as well as providing the level of detail required by land owners and developers. Accordingly the document comprises the masterplan for Cranbrook, which sets out the evidence behind the preferred approach as well as plans identifying land for differing types of development, and a separate list of policy requirements. The full evidence base will be available for public viewing during the consultation period.

The choice of preferred land allocations is of particular note. Strategy 12 of the Local Plan states that the additional 1,550 homes and associated jobs and infrastructure will be accommodated within the Cranbrook Plan area but outside the designated Neighbourhood Plan Areas of Rockbeare, Broadclyst and Clyst Honiton. The preferred approach document indicates development occurring within parts of the Rockbeare and Broadclyst Neighbourhood Plan Areas.

In the Broadclyst Neighbourhood Plan Area the encroachment is a small area of land adjacent to Station Road. In the Rockbeare Neighbourhood Plan Area the encroachment is of a larger parcel of land to the South of London Road (B3174), encompassing land for a range of uses, including housing development and Suitable Alternative Natural Green Space (SANGS). The decision to propose to allocate land within these areas for development at Cranbrook arises from careful consideration of the evidence documents which support the preferred approach and the consensus of responses to the Issues and Options Consultation in 2016.

The inclusion of land in the Rockbeare Neighbourhood Plan Area would allow for a more coherent pattern of development when assessing Cranbrook and its relationship with London Road whilst still retaining the character of Rockbeare and preserving views out of the village. Work on landscape impacts carried out on behalf of the Council identifies that the land proposed to be allocated for built development would have an acceptable impact upon the character and setting of the village as development would be obscured from Rockbeare due to land form.

Legislation allows for there to be discrepancies between two plans, with section 38 of the Planning and Compulsory Purchase Act 2004 stating that where there is conflict between two plans, it must be resolved in favour of the policy which was last adopted, approved or published. On this basis, were the land allocations identified in the preferred approach document adopted, they would supersede the part of Strategy 12 that refers to the exclusion of development in the Broadclyst and Rockbeare Neighbourhood Plan Areas.

In addition to the allocation of land to accommodate the additional housing required, the preferred approach document looks to do the following:

- Allocate land for two primary schools and a Special Educational Needs school;
- Allocate land for employment and mixed-use development;
- Indicate large areas of land that could be used to deliver Suitable Alternative Natural Green Space (SANGS) to mitigate the impact of development upon the Exe Estuary and Pebbled Heaths;
- Require the delivery of an engine testing pen at Exeter Airport before certain parts of residential development in the Treasbeare area begin;
- Two sites for the provision of pitches for Gypsies and Travellers;
- Safeguard land for a second railway station at Cranbrook but also to allow for a second platform and pedestrian/cycle overbridge at the existing station to enable, in conjunction with a passing loop, for an increased rail service to serve the town. This approach allows most flexibility in how increased rail services are delivered;
- Undergrounding of a stretch of high voltage power line to open up additional land for development.

The consultation policy requirement document sets out a series of policy topics and headings and the evidence to support them and as well as the matters mentioned above, includes policies relating to development management issues such as design, connectivity and parking. This report should be read in conjunction with the IDP report which is also included on this agenda and provides further information regarding infrastructure delivery.

5 Sustainability Appraisal and Strategic Environmental Assessment

As part of the development of the masterplan further Sustainability Appraisal (SA) work has been commissioned along with a Strategic Environmental Assessment. The SA and SEA reports will be published alongside the Issues and Options consultation.

6 Public Consultation and Engagement

Consultation on the Preferred Approach will start on the 10 November for a period of just over 8 weeks. This stage of consultation is not statutorily required but is considered good practice and normal procedure would be to consult on a plan for a 6 week period. In this instance a 6 week consultation would end on 22 December and as the Council offices are closed during the Christmas period it is thought sensible to give the public an additional 2 weeks to comment, taking the consultation period to 8 January 2018.

Attendance at events has been planned to engage with residents of Cranbrook and surrounding Parishes, including the Cranbrook Christmas Lights Switch-on and attendance at a weekend indoor sale. A static unmanned display will be available to view at Younghayes Centre reception area throughout the consultation period. Advisory postcards of the consultation will also be delivered to each household in Cranbrook, along Station Road, in Rockbeare and surrounding properties within the Cranbrook Plan area in order to encourage engagement. Offers of attendance at Town and Parish Council meetings have been sent to Cranbrook, Broadclyst, Clyst Honiton, Rockbeare and Whimple. The planned consultation will be in accordance with the statement of community involvement which accompanied the Local Plan and provides details of how consultation on the plan and associated development plan documents will be carried out.

7 Next steps

Following analysis of the consultation responses a publication document will be developed. This will be reported to Strategic Planning Committee and Full Council for agreement and again will be published for consultation purposes. It is envisaged that at this point a report to Strategic Planning Committee will also advise on progress with the various current planning applications that relate to the expansion of Cranbrook. Even if Members are content to determine applications in advance of the DPD it will be important to complete the work on the DPD itself to provide a strong policy base for other applications that will come forward including the reserved matters applications for the expansion areas.

Following consultation on the draft DPD and associated documents and supporting evidence, it will be submitted for examination. This is likely to be late spring/early summer 2018 with examination likely to take place during the summer/autumn with adoption planned for early 2019. On formal adoption the Cranbrook Plan will have full weight as a policy document and will be used to guide the determination of planning applications.

In its final publication format, the Cranbrook Plan will include a series of policies to allocate the land necessary for the development, secure new and improved infrastructure and services and provide detailed policies on development management matters. The table below sets out the types of matters which the Council intends on including within the policies of the final Cranbrook Plan and brief reasons for each of these.

	<u>Focus</u>	<u>Topic</u>	<u>Policy Expectation</u>	<u>Commentary/Evidence</u>	<u>Key Evidence Documents</u>
1.0	<u>Allocations</u>	<u>Expansion areas</u>	To allocate 2 parcels of land to the south east and south west of the existing town for mixed use development	Local Plan Strategy 12 (S12) allocates land for mixed use development including around 6300 new homes at Cranbrook. The policy also requires the delivery of a further 1550 houses and associated jobs social, community and education facilities and infrastructure within the Cranbrook Plan Area identified on the West End Inset map. This policy sets out where this residual development will occur.	Local Plan;
2.0	<u>Area Specific requirements</u>	<u>Bluehayes (Western Area)</u>	<p>Within the Western expansion area provision will be made for mixed use development and the infrastructure as set out within the masterplan; specifically including:</p> <ul style="list-style-type: none"> • the delivery of a 2 form Entry Primary School; • the accessing and enhancement of the mature park • connectivity with Cranbrook Station • delivery of one of two gypsy and traveller sites required for the town • delivery of a Neighbourhood centre along the London Road frontage • allocation of land for meanwhile uses 	<p>As a result of the evidence, the masterplan seeks to provide infrastructure within locations where they are the most accessible. In this instance the education facilities should sit at the gateway to this parcel and are likely to serve the greatest number of people. Together with good access and permeability to Cranbrook Station and the provision of a Local Centre where it is likely to receive the greatest degree of footfall these elements combine to help achieve a sustainable, healthy and accessible town.</p> <p>It also makes provision for delivery of one of the two gypsy and traveller sites required at the town. Such provision/locations allows appropriate access to the wider strategic road network for occupiers of the site but also good integration with the settled community.</p> <p>In addition this parcel benefits from an area of existing formal parkland (Blue Hayes Park) which can be enhanced and made publicly available for access through this development</p>	Gingko Report; EHRC report; Space syntax UDC and UDC2; HAWS;

			<ul style="list-style-type: none"> • identification of suitable uses for mixed use areas 	<p>Uses/development will naturally seek to become established overtime and unlike an established town where there is a range in age of buildings, spaces and infrastructure, Cranbrook is being brought together and developed as a town in a very short period time. It is therefore considered necessary and appropriate that pockets of land within each allocated area are used for temporary uses while the community becomes established.</p>	
2.1	Treasbeare (South western Area)	<p>Within the south western expansion area provision will be made for mixed use development and the infrastructure as set out within the masterplan; specifically including:</p> <ul style="list-style-type: none"> • delivery of a Neighbourhood centre along the London Road; • a significant area of dedicated employment space • delivery of a sports hub • safeguarding of land for energy centre expansion • provision of noise mitigation scheme to attenuate by at least 15db noise derived from the engine testing facility at Exeter Airport and for this to be operational prior to occupation of houses within the noise sensitive area • a requirement for good levels of integration and connection within the existing town. • allocation of land for meanwhile uses • identification of suitable uses for mixed use areas 	<p>The London Road risks being a barrier to movement between the existing town and development within this parcel and therefore the need for a high level of integration with the resultant benefits to sustainability and movement of people is important. This can be facilitated through the positioning of a neighbourhood centre on London Road (with connectivity to the Blue Hayes Neighbourhood Centre) and the clear identification of a movement strategy across this corridor.</p> <p>Movement will also be paramount to the success of the sports hub which is located on the potentially visually more prominent rising land to the south.</p> <p>Evidence indicates that the employment uses should target the stepping stone market sector for which there is a current shortfall, although by co-locating this with existing employment land and the adjacent airport best use of the available land and access can be attained. The employment provision seeks to build on Strategy 31 of the East Devon Local Plan.</p> <p>To try and ensure a good quality of life for future occupiers of the residential dwellings provided in the western part of this site (see plan below) there is a need to provide noise mitigation to overcome the problems identified. This will need to be in place and operational prior to the any occupations in area D. As a Healthy New</p>	<p>Gingko Report; Bickerdike Allen Partners; Space syntax; UDC and UDC2; HAWS; HAD report; Local Plan</p>	

				town it is important that identified threats to health and wellbeing that can be identified from the outset are dealt with at an appropriate time.	
2.2	Cobdens (Eastern area)	<p>Within the eastern expansion area provision will be made for mixed use development and the infrastructure as set out within the masterplan; specifically including:</p> <ul style="list-style-type: none"> • delivery of a Neighbourhood centre along the London Road; • undergrounding of existing overhead power lines • delivery of one of two gypsy and traveller sites required for the town • the delivery of Education facilities; • allocation of land for meanwhile uses • identification of suitable uses for mixed use areas 	<p>As a result of the evidence, the masterplan seeks to provide infrastructure within locations where they are the most accessible. In this instance the education facilities should sit centrally within this parcel to serve the greatest number of pupils. Together with good access and permeability to a potential location for a second Cranbrook Station and the provision of a Local Centre where it is likely to receive the greatest degree of footfall, these elements combine to help achieve a sustainable, healthy and accessible town.</p> <p>It also makes provision for delivery of one of the two gypsy and traveller sites required at the town. Such provision/locations allows appropriate access to the wider strategic road network for occupiers of the site but also good integration with the settled community.</p> <p>Undergrounding of the electric cable in accordance with the report prepared by BTS helps to maximise the development of available land and improve the ability of community development by removing a dividing corridor and develop land of lower landscape impact all in accordance with National guidance</p>	<p>Gingko Report; BTS report; EHRC report; Space syntax UDC and UDC2; HAWS; HDA report;</p>	
2.3	Grange (south eastern Area)	<p>Within the south eastern expansion area, provision will be made for mixed use development and the infrastructure as set out within the masterplan; specifically including:</p> <ul style="list-style-type: none"> • delivery of a Neighbourhood centre along the London Road; • undergrounding of existing electric cables; 	<p>As a result of the evidence, the masterplan seeks to provide infrastructure within locations where they the most accessible.</p> <p>Undergrounding of the electric cable in accordance with the report prepared by BTS helps to maximise the development of available land and improve the ability of community development by removing a dividing corridor</p>	<p>Gingko Report; BTS report; Space syntax; UDC and UDC2; HAWS; HDA report;</p>	

			<ul style="list-style-type: none"> • allocation of land for meanwhile uses • identification of suitable uses for mixed use areas 	and develop land of lower landscape impact all in accordance with National guidance	
2.4		Town Centre	<p>To ensure the delivery of an economically successful town centre and one that meets its aspirations as being the focus of a healthy New Town, policy will support and make provision for the delivery of:</p> <ul style="list-style-type: none"> • a health & wellbeing campus (including primary medical centre and children’s centre); • the safeguarding of land for a future leisure centre; • Town Council Offices; • Extra care housing; • Transformer station for the roll out of District Heating to the expansion areas; • allocation of land for meanwhile uses; <p>as well as setting out a list of uses that will be supported.</p>	The Town centre will form a focus for the town and should underpin its aims and ethos as being a sustainable place that is healthy vibrant and economically successful.	Gingko Report; Space syntax; CABE report; UDC and UDC2; HAWS;
2.5		Gypsy and Traveller Allocation	Provision of two gypsy and traveller sites and their delivery in accordance with adopted SPD	<p>Strategy 12 of the Local Plan sets out the requirements for Gypsy and Traveller provision but at the time of the Local Plan preparation did not seek to identify specific locations. Together with the area policies, this policy provides specifically for the identified need and seeks to allocate sites within the plan area requiring their appropriate development.</p> <p>The East Devon Gypsy and Traveller Site Design and Layout SPD recognises Government research which sets</p>	EHRC report;

				out that larger sites should not exceed 15 pitches to help improve integration. This justifies Cranbrook's allocation of up to 30 pitches being split between 2 sites.		
2.6		Education Land	Allocation of 1.6ha of land adjacent to the existing Education Campus	This land is required to meet the identified Education needs arising from the development of the town	DCC Education; 106 Infrastructure report	
3.1.1	Strategic Infrastructure	Rail	Provision of a passing loop on the railway line to enable enhanced train services	The train line on which Cranbrook lies is in this location only a single track with a resulting hourly service linking with Exeter St Davids and London Waterloo. As an important commuting line the report from UES recognises that to increase frequency a passing loop is required and therefore it is important that Policy makes provision for the delivery of this element of infrastructure	UES	
3.1.2			Support the provision of a second platform and overbridge at the existing railway station	A second platform with overbridge would, in conjunction with a passing loop allow for a significant increase in capacity at the station. Improved frequency would help to improve the sustainable credentials of the town and allow the modal shift that is being sought by the County Council in their concerns about local road capacity.	UES	
3.1.3			Safeguard land for the delivery of a second railway station	Within the UES report it is also recognised that the current station is at the head of a cul de sac with only limited connection to the main town. To improve connectivity with the rest of the town including the eastern expansion area it is appropriate to safeguard land in the east where feasibility studies have indicated that a second station could be delivered	UES	
3.2.1		Bus	High quality bus services to the town, linking it with surrounding area and services	The provision of a range of interconnecting public transport services is essential to the delivery of a sustainable new town. Work by UES highlights both the existing shortcomings of the existing services which remain under review but also the need to deliver improved services for the greater level of population that will result from the planned development.	UES; UDC and UDC2; HAWS;	

3.3.1	London Road Improvements	Requirement for a dedicated London Road Strategy which shall coordinate access for each expansion area	London Road forms the single most important connection serving both the existing town and all expansion areas. Road widths, junction design and movement along and across the road are fundamental to the success of an integrated and balanced community.	Space Syntax; MfS 1 & 2;
3.4.1	Exeter International Airport	Development within the currently identified airport safeguarding area will <ul style="list-style-type: none"> • need to be assessed for potential interference with the Navigational Aids system that is currently in operation and/or • need to support the provision of a renewed system to reduce the degree of likely impact on airport safety and facilitate the delivery of development 	There is little or no capacity within the existing Navigation Aids systems at Exeter Airport against which further development is likely to increase potential interference. There is a need to address this through modelling of individual developments in the short term and update the system as soon as possible to significantly reduce the potential for airport safeguarding acting to restrict future development at the Town and surrounding area.	Consultation response to planning applications from Exeter Airport;
3.5.1	Energy	Safeguard/Allocate land for the expansion of the district heating Energy Centre	To continue to develop the roll out of District Heating throughout the expansion area, land immediately adjacent to the existing Combined Heat and Power plant is needed –this is evidenced by E.On.	NPPF; NPPG
3.5.2		Provision of district heating throughout the development	To ensure that the expansion areas benefit district heating, it is necessary to set out the requirement for the infrastructure to be extended to allow future connections and also to ensure that future phases connect to the infrastructure that has been provided.	Heat Network strategies;
3.6.1	Community Development	A range of community infrastructure is required to support the delivery of the town including <ul style="list-style-type: none"> • Allocation of land for a place of worship, • Provision of emergency service facility 	There are a range of facilities that are needed to help ensure that a community functions and this is particularly important here recognising that Cranbrook is a Healthy New Town and one that aspires to high sustainability credentials. A range of evidence supports these requirements including the SLRC report (allotments)	SLRC report; HAWS;

			<ul style="list-style-type: none"> • Delivery of a compound suitable for street scene operations • Provision serviced allotments • Provision of an enhanced library facilities/service • Provision and delivery of community shared transport schemes e.g. car clubs and hire bikes 		
3.7.1		SANGS	Provision of on-site SANGS to mitigate the impact of development	It is recognised that without mitigation, development can have a significant and unacceptable effect on European designated sites. In this instance it is considered necessary that the SANGS (Suitable Alternative Natural Green Space) component of the mitigation is provided on site. The SANGS provision should be of a quality and type suitable to be used as mitigation for residential environments to reduce the recreational pressure on both the Exe estuary and Pebblebed Heaths.	Local Plan S10, S47; SEDEMS report;
4.1.1	<u>Development management Policies</u>	Movement and Transport	Development of, and adherence to a Travel Plan which should include the provision of a welcome pack and tablet with associated apps	Travel plans are recognised as a way of mitigating the negative transport impacts of development in order to promote sustainable development. The planning practice guidance considers that they are required for developments which generate significant amounts of movement. As part of the Healthy New Town designation by NHS England there is an opportunity to build a healthier place. This can be achieved by early and ongoing consideration of transport and means of travel by engaging with the community. In addition it has been recognised by Highways England that the Strategic road network will be at capacity as a result of this expansion and therefore it is important to seek more sustainable forms of travel to aide this capacity issue.	HAWS;
4.1.2			Electric car charging points for all residential dwellings and provision within public parking areas and within business car parks	Government announcement of intention to ban sale of new petrol/diesel only vehicles from 2040. Supports move to more sustainable methods to power motor vehicles in the interests of climate change.	NPPG; UK Plan for Tackling Roadside Nitrogen

					Dioxide Concentration s
4.1.3			Provision of adequate secure cycle storage both in public areas and for dwellings without garaging.	Safe secure and where appropriate covered cycle storage is required to promote the use of cycling as a viable means transport around the town. This helps to underpin the concept of sustainable development and a happy healthy town	HAWS;
4.1.4			Support the delivery of a fuel station at an appropriate location within the town	A site for a multi fuel station that facilitates the mobility of future residents remains important as part of the wider movement strategy. However recognising the changes to technology and the governments announced intention to restrict the sale of new petrol/diesel engines by 2040, such a facility would need to include or have the capacity to include a variety of fuels.	NPPG
4.2.1	Economy & Enterprise		Secure sufficient ducting to provide fibre optic broadband connections to all premises and future proof development in this respect	As part of the servicing of plots, ducting shall be provided to facilitate the delivery of fibre optic broadband. This is identified as requirement of delivering a sustainable and economically resilient community	NPPF
4.2.2			Through the siting of appropriately designed apparatus, facilitate the delivery of wi-fi hotspots and improved mobile phone coverage for the town	Currently the level of connection across the Town is patchy. This undermines the economic and social functioning of the existing town and is a matter that should be addressed for the expansion areas – with a large critical mass of population the incentive for external investment is considered more likely.	Coffey Comms report;
4.2.3			Business space and the Business Ladder linked to flexible employment space & business support	Evidence suggests that the local need for employment provision lies in the delivery of small serviced start up units. As indicated in the Business ladder diagram the development and growth of small start-up businesses facilitates the future growth of the wider economy and is a key component in delivering the successful sustainable and economically resilient new community	EDVSA; Economic Development Strategy;
4.3.1	Green Infrastructure & Ecology		Provision of meaningful and well distributed spaces	To fulfil both the role as a Healthy new town and in delivering a town with identity and character it is important that meaningful and well distributed green	BFL12; Making Places; Biodiversity in Planning;

			spaces are provided. Such spaces bring relief to built form and allow an area of informal recreation and exercise.	HAWS;
4.3.2		Production of a Landscape, Biodiversity and Drainage Strategy for each of the four allocated development areas before the first determination of an application within that area	The current LBDS has proved a useful tool in coordinating these components and seeking to ensure that a well-integrated strategy is provide for each sub phase. It is considered appropriate that this requirement is extended into the expansion phases which this policy would require. It is expected that within the new LBDS bird and bat boxes would be integrated into every dwelling (in accordance with new draft BS - <i>Biodiversity and the built environment: Specification for the Design and Installation of Bird Boxes</i>).	Biodiversity in Planning; HAWS;
4.4.1	Design	Production of a design code for each of the four allocated development areas before the first determination of a detailed or Reserved Matters application within that area. This shall specifically set out how a range of housing typologies will be provided for which are appropriate to their local context and demonstrate how their role together with features including public squares and spaces aides place making.	Place making is an inherent and important strand of the NPPF and practice guidance and requires the consideration of design at an early stage in the development process – this allows certainty for developers and aides the delivery of development. To fulfil the aims of the delivery of a Healthy New Town which is a sustainable vibrant and economically resilient community, a high quality design approach is required. It is considered important that typologies are used as means of helping to shape future spaces and places and through this consideration a range of character areas can be achieved.	Housing density study; Making Places; BFL12; UDC and UDC2; HAWS; Sustrans Design Manual Ch7;
4.4.2		Housing schemes should be designed with a layout <ul style="list-style-type: none"> • to maximise the use of passive solar design • provides adequate outside and or garden size proportionate to the size of the dwelling 	The incorporation of low technology solutions is a good way of improving the sustainable credentials of the development without adding significantly to the cost. Outside space is important for the wellbeing of occupiers and helps to deliver a healthy town	BFL; NPPG; HAWS;
4.4.3		Requirement for phasing plans to support applications for each of the four allocated areas	It is important that development within each of the four areas is phased to deliver the houses in step with other vital infrastructure. Phasing plans will assist with achieving this.	NPPF

4.4.4			Assessment of schemes against the criteria identified in Building for Life 12	Building for Life 12 and the criteria set out within the document represents a recognisable and clearly defined method for assessing development proposals that allow for certainty for all – developers, the Local Authority and interest community groups and individuals. The criteria represent a useful tool which is recognised as bringing benefits to the place making agenda which is necessary if Cranbrook is to fulfil its potential as a sustainable Healthy New Town.	BFL12; NPPG
4.4.5			Development of adaptable buildings and spaces that could be used for alternative uses	Developing the concept of meanwhile uses identified within the allocations policy, this policy seeks to allow for flexibility and adaptability within buildings and spaces that come forward within individual sub phases. It recognises that the longevity of a place results from buildings and spaces being adaptable allowing future community needs and wishes to be fulfilled.	BFL12; NPPG
4.4.6			Provision of refuse storage facilities that meet the needs of the household	The trend Nationally and one that has also been developed locally is for a varied waste and recycling collection service. Storage of such material takes space and it is therefore important that suitable provision for such storage is designed into the developments. While policy H3 of the Local Plan requires such details for flat conversion it is now considered necessary to widen this for new build housing.	BFL12; DCC Waste Plan
4.4.7			Minimum parking space sizes	While the local plan under Policy TC9 identifies that 2 spaces as a guide are required for dwellings with 2 or more bedrooms, it stops short of specifying size requirements. This is considered necessary in this instance to ensure that spaces that are delivered can remain available for the identified purpose, and allow cars to be parked in the spaces, doors opened, and where appropriate pedestrian movement to pass the parked car.	BFL12;

List of Referenced Documents

Bickerdike Allen Partners (2016) EDDC Development management and Environmental Health Joint Airport Noise Study – Updated Noise Impact Assessment, Exeter International Airport Parts 1 and 2 (Final)

Birkbeck and Kruczkowski (2015) Building for Life 12 – The sign of a good place to live [BFL12]

British Standard 42020 (2013) Biodiversity in Planning and development

BTS (2017) Strategy Report relating to Overhead Lines at Cranbrook Expansion Site East

CABE (2004) Design Reviewed – Town Centre Retail

CIHT (2010) Manual for Streets 2 – Wider application of the Principles [MFS2]

Coffey Comms (2015) A report analysing the mobile phone reception around the east Devon development area

Department for Communities and Local Government (2015), Planning Policy for Traveller Sites

Department for Communities and Local Government (2017) Planning practice guidance

Department for Communities and Local Government (2012) National Planning Policy Framework

DEFRA and Department for Transport (2017) The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations

Devon County Council (2013) Education Section 106 Infrastructure Approach

Department for Transport (DfT) (2007) Manual for Streets [MfS]

East Devon District Council (2016), East Devon Local Plan 2013 – 2031 (Adopted 28 January 2016)

East Devon District Council (2017), East Devon Gypsy and Traveller Site Design and Layout SPD (Adopted 22 February 2017)

East Devon District Council - Cranbrook Economic Development Strategy

EDVSA (2015) Our Place operational Plan

Equality and Human Rights Commission (EHRC) (2009) Gypsies and Travellers: simple solutions for living together

Gingko (2016) Cranbrook in Common, A cultural Development Strategy 2016-2026

Great Places Housing Group (2015) Making places – the Quality Design Guide

HDA (2017) Cranbrook – Landscape and Visual Appraisal (pending receipt of final report – due by 3rd November 2017)

Lash D And Norton A (2016) Heat Network Strategies for the East Of Exeter

Llewelyn Davies (2000) Urban Design Compendium

MLA (2012) Housing Density Study on Behalf of the Greater London Authority

Northern, Eastern, and Western Devon Clinical Commissioning Group (2016) Cranbrook – a healthy new town: health and wellbeing strategy 2016 – 2028 [HAWS]

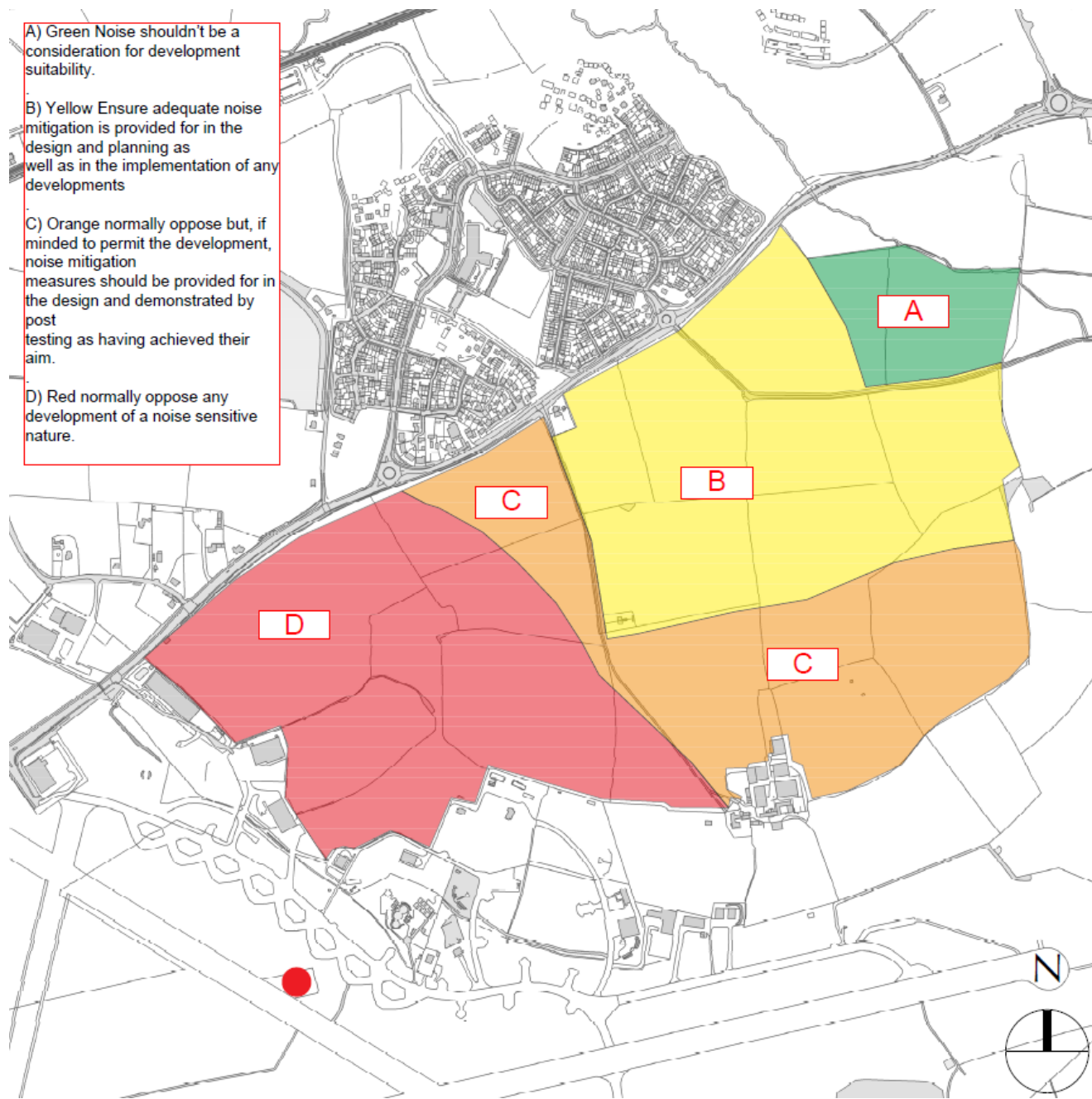
Roger Evans Associates (2007) Urban Design Compendium 2 – Delivering Quality Places

Footprint Ecology (2014) south east Devon European Site Mitigation Strategy [SEDEMS]

Space Syntax (2017) Cranbrook New Town – Masterplan option testing

Sustrans (2015) Design Manual Chapter 7 – Junctions and crossings – cycle friendly design (draft)

- A) Green Noise shouldn't be a consideration for development suitability.
- B) Yellow Ensure adequate noise mitigation is provided for in the design and planning as well as in the implementation of any developments
- C) Orange normally oppose but, if minded to permit the development, noise mitigation measures should be provided for in the design and demonstrated by post testing as having achieved their aim.
- D) Red normally oppose any development of a noise sensitive nature.



Report to: **Strategic Planning Committee**

Date of Meeting: 6 November 2017

Public Document: Yes

Exemption: None



Review date for release Review of the proposed response is unlikely to be needed or appropriate – but if relevant the date would be dependent on the Government response to the consultation.

Agenda item: **8**

Subject: **Proposed response to Government document - Planning for the right homes in the right places: consultation proposals**

Purpose of report: This report provides a proposed response to a government document called - Planning for the right homes in the right places: consultation proposals.

Recommendation: **It is recommended that the proposed officer response to the consultation, which forms Annex A to this Committee report, is submitted to Government**

Reason for recommendation: To ensure the Council expresses its views on the consultation.

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

Financial implications: No direct financial implications.

Legal implications: No legal implications arising from this consultation response

Equalities impact: Low Impact

There are no specific equalities issues identified.

Risk: Low Risk

Responding to the consultation is low risk – however the future action the Government takes could have implications for the Council that have risk considerations.

Links to background information: The Government Consultation document can be viewed at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/644955/Planning_for_Homes_consultation_document.pdf

and the introductory page to consultation that also provides links to other material (including a spreadsheet of calculated housing needs) can be viewed at:

<https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>

Link to Council Plan: The issues referred to in this report relate to all priorities set out in the Council Plan.

1 Background Information

- 1.1 The Government, through the Department for Communities and Local Government, have issued the consultation document: Planning for the right homes in the right places: consultation proposals – 2017.
- 1.2 In the document it is advised that:
“This consultation seeks views on a number of changes to planning policy and legislation. Some of these changes were foreshadowed in the housing White Paper available at: <https://www.gov.uk/government/publications/fixing-our-broken-housing-market>”
- 1.3 This Committee paper provides a commentary on the Government consultation document and in Annex 1 sets out a proposed response to the consultation. Generally speaking the proposals set out in the consultation paper are to be welcomed though as with any proposed changes there are many matters of detail that warrant closer scrutiny. The text in this committee report presents a general overview of the proposals, with particular commentary from an East Devon perspective, whereas the proposed response to Government, Annex 1, goes in to more technical detail. This committee report, Annex 1 and the Government consultation document, should all be referred to for a full picture.
- 1.4 Council Officers recently attended a Planning Advisory Service (PAS) event in Taunton that was also attended by many of the key staff from DCLG. It was clear from this event that there was an awareness in Government of the many issues and challenges facing Local Authority Planning departments in terms of delivery housing, and a request to provide details of our experiences in trying to make the system work in practice. There was clear commitment to listen to our suggestions on how things could be improved, and our consultation response has therefore been prepared on this basis.

2 Calculating Housing Need (See Questions 1 to 6)

- 2.1 The consultation paper pays particular attention to calculating housing needs and highlights significant challenges and complexities that planning authorities can face in this work. Members will recall that assessment work on defining housing numbers for the East Devon Local Plan proved to be a lengthy and complex exercise. Bearing in mind the complexities that can arise the consultation paper proposes what is, on face value, a simple standardised approach to defining housing needs by local authority area that will be applied across the whole of England.
- 2.2 At present there is broad guidance for planning authorities on the factors to take into account in calculating housing needs for their area. But there is considerable flexibility in how this guidance is applied and different authorities and the consultants and specialists that advise them and also developers and other bodies can apply differing approaches that may generate very different types of outputs. In their consultation document at paragraph 12 the Government advise:
“The lack of a simple, standard approach to assessing local housing need has led to a costly and time-consuming process which lacks transparency:

- *many local planning authorities spend significant sums of taxpayers' money employing consultants to come up with a housing need figure, often using different and inconsistent methods. It can cost local planning authorities around £50,000 to prepare a strategic housing market assessment, which could equate to an overall cost to the sector of over £3 million per year;*
- *local planning authorities, developers and local communities often engage in disputes on the method used, which delays the process (by around six months) and adds cost; and*
- *few methods take significant account of the affordability of housing in their area.”*

2.3 The new proposed methodology has three steps:

Step 1 – Setting the baseline - this first step sets a base line figure for housing growth based on Office for National Statistics (ONS) household growth projections. Based on projected birth and death rates and looking at past trends in population migration the ONS make predictions of future population levels by local authority area and translate these into predicted future numbers of households and dwelling requirements. In East Devon there are, each year, more deaths than birth's and this factor taken alone would produce a declining population. However, more people move into the District from elsewhere than leave and this migration factor accounts for year-on-year population increases and therefore need for extra house building. In a small number of local authority areas the demographic data actually shows a declining number of households and in these cases a zero net new housing requirement is generated.

Step 2 – An adjustment to take account of market signals – the consultation document (at paragraph 18) advises that *“household growth on its own is insufficient as an indicator of demand”*, and the document presents the case that household growth is constrained by availability and house prices in some areas. In the case of East Devon, where house prices are relatively high, part of the implied logic would be that more people would have chosen or been able to live here in the past if they could have afforded to do so. On this basis past trends or patterns in population and household growth have been suppressed and therefore just using demographic projections drawn from the past to establish future housing needs will not establish a robust picture of real need. This second step therefore applies a market signals assessment, at the local authority level, to establish areas where increases above the baseline position are appropriate. The approach advocated in the consultation document is to apply a defined statistical calculation to adjust housing need levels taking into account the ratio or amount by which median house prices are greater than median earnings (median is a mid-point in a range of values where half the values are greater than the mid-point and half are less). In East Devon the market signals adjustment increases housing needs but this is not (or would not appear to be the case) in all local authority areas.

Step 3 - Capping the level of any increase – In some local authority areas the proposed methodology would result in quite significant increases in housing levels from those that are currently calculated in needs assessment or currently planned. In many London Boroughs, for example, the housing needs measured under the proposed new system are significantly greater than their currently assessed need, in six London Borough's the new need level is over twice as high; in Greenwich it is 9¹/₂ times higher. Those authorities, using the

proposed methodology, that are ‘undersupplying’ to the greatest extent are predominantly in the South East of England and the greatest levels of ‘over-supply’ are predominantly in northern authority areas. The proposed capping measures would place limits on the degree to which future housing requirements in plans could exceed currently planned for housing levels.

- 2.4 **Housing Need calculations in East Devon** – the proposed methodology establishes a housing need for East Devon of 844 new homes per year (the Government consultation web site includes a spreadsheet showing calculated housing numbers). This 844 figure is the sum of a demographic assessment (Step A) + market signal adjustment (Step B). From the information supplied as part of the consultation it is not readily possible to distinguish for East Devon (or any other authority area) what is generated from Step A and what is generated from Step B. The 844 dwellings figure does, however, compare to a Local Plan figure of 950 new homes per year. Therefore this indicates an ‘oversupply’ in the District of just over 100 homes per year, there is, however, a very important caveat to note in that the proposed approach (at paragraph 46) allows local authorities to plan for higher housing levels, noting that this could be applicable as a consequence of;
- “... a result of a strategic infrastructure project, or through increased employment (and hence housing) ambition as a result of a Local Economic Partnership investment strategy, a bespoke housing deal with Government or through delivering the modern Industrial Strategy.”*
- 2.5 In East Devon there are growth expectations that will lead to a greater housing need and it was this planning for economic growth, specifically at the West end, that led to housing levels in the local plan being higher than base demographic change levels.
- 2.6 **Joint working across local authority boundaries** – the consultation paper notes that many authorities are working together on joint plans; this is the case with East Devon where we are working with Exeter, Teignbridge, Mid Devon and Devon County Council on the Greater Exeter Strategic Plan (GESP). Where authorities are working together the consultation paper advises:
- “we propose that the housing need for the defined area should be the sum of the local housing need for each local planning authority. It will be for the relevant planning authorities or elected Mayor to distribute this total housing need figure across the plan area.”*
- 2.7 **Deviating from the new method** – the proposed methodology allows authorities to plan for more houses than the need assessment identifies, and does not seek compelling evidence for them to justify higher levels. But the guidance provides far less scope for providing lower numbers; the consultation advises of need for *“compelling circumstances”* to justify lower levels of housing. In the past some planning authorities have presented a case, adopted through local plans, of environmental constraints being grounds for providing less housing than figures generated from needs assessment. In East Devon we do have very high quality environmental assets including Areas of Outstanding Natural Beauty and international wildlife sites; but specifically through the West End growth agenda it has been possible to successfully balance District wide conservation objectives alongside strategic development objectives.

3 Statement of Common Ground (See Questions 7 to 9)

- 3.1 It is established practice that planning authority's work with neighbouring authorities and other bodies and agencies in their plan making. The consultation now proposes that such working goes further through production of joint Statements of Common Ground. In the consultation document the Government (at paragraph 64 and it is advised to come through in a redrafted National Planning Policy Framework) advises;
"It is proposed that the statement will set out the cross-boundary matters, including the housing need for the area, distribution and proposals for meeting any shortfalls. In setting out the strategic cross-boundary issues, the statement will record where agreement has, and has not been reached."
- 3.2 In East Devon we already have a strong cooperative track record of working with partners on strategic planning and infrastructure matters as exemplified through both our West End work and commitments to and work on production of the GESP. Our key partnerships do lie on the western side of the District though we will also need to give some thought to possible other wider spatial considerations (although of far less strategic importance) across boundaries in to Somerset and Dorset and also southwards into the sea (the Marine Management Organisation should be signatories in respect of strategic matters).
- 3.3 From when it becomes a requirement the consultation proposes that all planning authorities should have a Statement of Common Ground in place within 12 months (and an outline statement in place within 6 months). Clearly some thought will need to be given to the spatial areas and issues that a statement or statements will cover and the early thought will be critical if deadlines are to be met. However our track record of joint working and the fact that the GESP will be emerging suggest that we should, in principle, be well equipped to meet deadlines, though much will depend on expectations or requirements for detail in such statements.
- 3.4 It should be noted that over and above the new statements the requirement of 'duty to cooperate' will remain in the plan making process. This duty, amongst other matters, requires consideration be given to accommodate housing needs across planning authority boundaries and the Consultation document advises (paragraph 83) that 'tests of soundness' used in plan examination are to be amended to include:
*"a) plans should be prepared based on a strategy informed by agreements over the wider area; and
b) plans should be based on effective joint working on cross-boundary strategic priorities, which are evidenced in the statement of common ground"*

4 Planning For a Mix of Housing Needs (See Question 10)

- 4.1 The consultation highlights a need to identify and plan for housing across a range of tenures/population groups, the consultation document specifically highlight (at paragraph 89):
- older and disabled people;
 - families with children;
 - affordable housing;

- self-build and custom-build development;
- student accommodation;
- travellers who have ceased to travel; and
- private rented sector and build to rent housing.

4.2 There will be the need for some work to be undertaken to identify needs by group and the consultation document advises that guidance will be produced to assist with assessing need, with specific reference made to elderly person needs. With a high proportion of elderly residents this will be a specific consideration of relevance in East Devon.

5 Neighbourhood Planning (See Question 11)

5.1 The consultation document notes that some Neighbourhood Plan making groups seek to plan for housing development through their plans but will frequently lack quantified evidence of housing need. The consultation document, referring to the housing White Paper, advises (at paragraph 96) of an expectation of planning authorities to provide neighbourhood plan groups with a housing figure for the neighbourhood plan group to plan or provide for. The consultation does, however, qualify this by saying such levels may be informed by the settlement strategy and housing allocations in a (local) plan strategy.

5.2 In the absence of a local plan to inform neighbourhood plan housing numbers the consultation document (paragraph 99) proposes a simple formula that would apportion the authority housing need figure to the neighbourhood plan (plan area) in accordance with the proportion of the resident population of the authority that live in that area. So for example under this approach if an East Devon Neighbourhood Plan area was home to 5% of total East Devon residents, and we use the 844 homes per year District wide 'requirement' then the neighbourhood plan could be expected to accommodate 5% of 844 homes per year which equals 42 homes. If the neighbourhood plan was to cover a 15 year period this would amount to 15 x 42 which is 630 homes that the plan would have to provide for.

5.3 The consultation document does comment on considerations that may be relevant to not meeting this need (albeit it the consultation does highlight the need being informed by any local plan strategy) but it does contrast to quite a degree to the approach we have taken in East Devon. The East Devon Local Plan adopts an approach where all of the District housing needs are met through local plan allocations and policy and therefore the housing requirement that is 'delegated' to Neighbourhood plan groups to meet is zero (or perhaps more strictly speaking a minimum of zero). Strategy 27 of the East Devon Local Plan allows communities to plan for and exceed the figure of zero if they choose to do so, but it does not compel them to do so. It can prove very challenging for Neighbourhood Plan groups to plan for housing growth in and through their plans, especially if requirement levels were high and it is highly questionable if all groups would wish to do so; it can be expected that it would put some or maybe many off producing plans. There is also a significant question around whether housing should be distributed in such an even way around the district without account being taken of local environmental and other constraints that may make the level of growth identified through this methodology inappropriate or unachievable.

6 Viability assessment (See Questions 12 to 17)

- 6.1 The consultation document contains a lengthy section on viability assessment and members will be aware that such assessments can become contentious matters that have significant impacts on securing developer contributions, specifically including contributions to affordable housing. In the consultation document (at paragraph 103) reference is made to “*a commitment to consult on standardised open book section 106 agreements*”. Many planning authorities, including this Council, have long called for ‘open book’ approaches to variability assessment but it is not an approach that is typically supported by the development industry.
- 6.2 The Community Infrastructure Levy (CIL) is also referred to in the consultation document and what are described as “*technical issues with the implementation*” are highlighted. In East Devon the biggest concern relates to whether CIL is the most efficient and effective means to secure the delivery of large scale strategic developments, specifically including Cranbrook.
- 6.3 The comments relating to viability assessment in Appendix 1 are lengthy and these may be separated out and submitted separately to the online submission.

7 Planning Fees (See Question 18)

- 7.1 The consultation document refers to proposals for an increase in planning application fees where authorities are delivering homes their communities need; this is to be welcomed.

8 Other Issues (See Question 19)

- 8.1 The consultation document has a final section called “other issues” this has sub-headings summarised below.
- 8.2 **Build out** – the consultation paper highlights aspirations to see homes built at a faster rate and highlights opportunities to speed up delivery and overcome blockages.
- 8.3 **Prematurity** – reference is made to changes to the NPPF to refer to when planning applications may be refused on the basis of a development plan being at an advanced stage of preparation and granting permission would (see paragraph 129) undermine the plan before it can be finalised. It is relevant to note that the consultation does not refer to a proposal being refused on prematurity grounds because of non-compliance with an emerging plan; the reference is in respect of undermining the plan.
- 8.4 **Housing White Paper** – reference is made to allowing respondents to the housing white paper (consulted on earlier this year) a further opportunity to supplement their earlier response. There are no suggested or identified comments that it is recommended we submit.

Annex 1 - Proposed Consultation Response by East Devon District Council

Family Name (Surname)*	Freeman
First Name*	Ed
Title	Mr
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Telephone Number	01395 517519
Email Address*	efreeman@eastdevon.gov.uk

Are the views expressed on this consultation your own personal views or an official response from an organisation you represent?* (please tick as appropriate)

- Personal View
- Organisational Response

Name of Organisation (if applicable)

East Devon District Council

If you are responding on behalf of an organisation, please tick the box which best describes your organisation

- Local Authority (including National Parks, Broads Authority, the Greater London Authority and London Boroughs)
- Neighbourhood Planning Body/Parish or Town Council
- Private Sector organisation (including housebuilders, housing associations, businesses, consultants)
- Trade Association / Interest Group/Voluntary or Charitable organisation

Other (Please specify)

Question 1 (a)

do you agree with the proposed standard approach to assessing local housing need? If not, what alternative approach or other factors should be considered?

Yes

No

Not sure / don't know

Please enter your comments here

We would agree in principle that establishing a standardised methodology for assessing local housing needs is desirable. It is very evident that there are a wide range of differing and complex approaches taken to assessing housing numbers with a variety of complex bespoke models applying differing approaches and interpretations generating very varied and inconsistent outputs. Many models and approaches lack transparency and are difficult if not impossible to interrogate.

Use of demographic trend data (Step 1), as proposed, forms a logical starting point to assessing future needs.

In respect of market signals (Step 2) it is of concern that there is no clear robust local level evidence presented in the consultation paper to underpin the formula applied in the Step 2 process. There is a fundamental issue about the increasing of housing supply that the consultation paper does not fully address - it is not clear if the intent is to increase housing supply;

1. because prices are high compared to wages and this indicates a high demand so quite simply more houses should be built in response; and/or
2. whether building extra houses, and therefore increasing supply, will reduce the cost (or at least restrict house price inflation).

If the answer is yes to just the first point then it is questioned whether this reason alone would justify more houses being built (in a market economy there are always going to be variations in what things cost). If the second reason is part or all of the thinking then it would be desirable for the methodology to provide a far more rigorous critique of predicted quantified impacts on house prices that may result (proof should be given to demonstrate that the results sought will occur).

Furthermore the logic behind the approach taken in Step 2 (at paragraph 21 of the consultation paper and in so far as it goes) would appear to rest on a desire to see total house building levels across England at a position that is higher than demographic projection identify as 'needed'. Whilst the national objective is understood the local level logic of the formula is not explained.

It is unclear if or how (specifically in a quantified manner) the proposed market signal adjustment factors (i.e. building more homes) will impact on house prices and therefore people's ability to afford a home in any given locality. If building more houses at a local

authority (or group of authorities) level does not or cannot be shown to have a meaningful impact on actual prices it will not address affordability concerns and therefore it is questionable whether it has robust logic as an approach.

Furthermore it is questionable whether allocating more land or having policy to build more will actually see more houses built. The consultation paper would appear to imply that it is planning, and the supply of land through the planning system, that is the total or at least the over-arching determinant of what is built. Whilst planning obviously has a relevance to levels of development the actual picture is far more complex embracing such factors as commercial models applied by developers (and is it actually in their commercial interest to see more development), interest rates, lenders operational practices and available labour and materials.

In respect of the proposed Stage 3 it is unclear what is meant in paragraph 25 in respect of text reading *“To help ensure the method is deliverable”*. Is this *“deliverable”* in terms of houses being built or *“deliverable”* in terms of political acceptability (or perhaps in some other manner)? If it is deliverable in terms of houses being built then logic, justification and reasoning for the approach of using a 40% figure should be expanded on.

In Paragraph 31 reference is made to Joint working. Many Council’s participate in joint plan making. East Devon District Council is working on a joint plan with Exeter City Council, Mid Devon, Teignbridge District Council’s and Devon County Council. We welcome the references to joint plan making and the scope to distribute the sum of housing needs across the joint plan making areas.

Question 1(b)

how can information on local housing need be made more transparent? Please enter your comments here

From an East Devon District Council perspective we present our objectively assessed housing need in a clear and transparent manner in our local plan with links to evidence documents. Publishing in this manner and/or through annual or other monitoring reports would be appropriate. We would highlight that the availability of publically available data seems crucial if there is to be effective scrutiny and meaningful engagement in this debate from members of the public and community groups.

Question 2

do you agree with the proposal that an assessment of local housing need should be able to be relied upon for a period of two years from the date a plan is submitted?

Yes

No

Not sure / don't know

Please enter your comments here

On a practical level a two year period would seem reasonable as it provides a realistic period between plan submission and running through all stages of examination and to adoption. But as the figures and data are published at least annually people will still argue that the target should be adjusted one way or another. There is therefore a need for National policy/guidance to offer absolute clarity about the method to be used and how any updates are to be addressed (or not). It is crucial that this is then robustly backed up by the Planning Inspectorate at both Local Plan Examinations and through the determination of planning appeals.

Question 3

do you agree that we should amend national planning policy so that a sound plan should identify local housing needs using a clear and justified method?

Yes

No

Not sure / don't know

Please enter your comments here

Whilst it probably makes sense for this to be a test, Inspectors do already assess whether a housing need has been robustly evidenced so it is not clear how this proposal makes that much of a difference. It also potentially leaves it open to use of alternative methods (other than the standardised methodology) if preferred and considered to be robust – was this the intention? If so, that might be reasonable but claims that this will remove disputes where different methods have been used and speed up the process is probably overstating the impacts.

Question 4

do you agree with our approach in circumstances when plan makers deviate from the proposed method, including the level of scrutiny we expect from the Planning Inspectors?

Yes

No

Not sure / don't know

Please enter your comments here

Where a local authority propose greater levels of housing than the standard methodology implies are needed then it would be hoped and expected that the authority has undertaken a rigorous, reasoned and careful assessment to justify these new figures. So long as an Inspector is satisfied by the robustness of the Council position then it would be reasonable for Planning Inspectors to work on an assumption that the approach is robust.

It is a concern, however, that for a plan making authority to propose a lower housing figure a far more demanding test is implied. In a limited number of cases it may be that the entirety of a planning authority area offer sufficient scope to accommodate the total housing needs. In most planning authorities, however, there will be areas that are unsuited to development and constraints could place limitations on overall ability to accommodate need or ability to accommodate that need in certain areas and some such areas could be large. The possibility as expressed in the consultation document of all needs typically always being met is disproportionate and could lead to unreasonable environmental damage that is not thoroughly considered by the plan or the Inspector. Planning is about balance and finding the best answer to fit the circumstances. There may be good reason why housing need should be reduced on account of environmental or other constraints; but as drafted the document implies justifying lower numbers would be likely to be a very exceptional outcome only.

Question 5(a)

do you agree that the Secretary of State should have discretion to defer the period for using the baseline for some local planning authorities? If so, how best could this be achieved, what minimum requirements should be in place before the Secretary of State may exercise this discretion, and for how long should such deferral be permitted?

Yes

No

Not sure / don't know

Please enter your comments here

Yes, it is reasonable to allow discretion where a plan is being prepared and is subject to reasonable delay or is planning to meet its needs through strategic scale development that will take time to come to fruition.

Question 5(b)

do you consider that authorities that have an adopted joint local plan, or which are covered by an adopted spatial development strategy, should be able to assess their five year land supply and/or be measured for the purposes of the Housing Delivery Test, across the area as a whole?

Yes

No

Not sure / don't know

Please enter your comments here

The logic for producing joint local plans will frequently be underpinned by a recognition by planning authorities that the way areas work and function, and people live their lives, are not defined by Council boundary lines drawn on a map. Given that such cross-boundary thinking and working applies it is also sensible and logical for Council's to collectively be able to determine areas to which five year land supply assessment is appropriate. This may well be the entirety of the plan area and of the constituent authorities to that area. However, where Councils (either jointly or as individual authorities) present robust evidence in a local plan that directs development to certain locations and for sound reasons not to others then it is also appropriate for separate five year land supply areas to be defined that may include part, some or all of one or more planning authority areas. Such an approach and the numbers involved should be tested by Planning Inspectors through plan examination.

Question 5 (c)

do you consider that authorities that are not able to use the new method for calculating local housing need should be able to use an existing or an emerging local plan figure for housing need for the purposes of calculating five year land supply and to be measured for the purposes of the Housing Delivery Test?

Yes

No

Not sure / don't know

Please enter your comments here

This would seem appropriate and it is not clear how else they could establish their needs.

Question 6

do you agree with the proposed transitional arrangements for introducing the standard approach for calculating local housing need?

- Yes
 No
 Not sure / don't know

Please enter your comments here

Generally the approach seems reasonable and should encourage plan making and reviews to be carried out in a timely manner. However, the potential for allowing longer transitional period for London and Combined Authorities should be extended to any area working on a joint plan noting the complexities that can arise where cross-boundary plan making work occurs.

Question 7(a)

do you agree with the proposed administrative arrangements for preparing the statement of common ground?

- Yes
 No
 Not sure / don't know

Please enter your comments here

Many planning authorities (and local authorities in general – including across a wide range of service areas) already undertake regular and coordinated cross-boundary working. This is most notably the case where authorities are producing joint planning policy documents. The consultation document proposals can, therefore, be seen as an extension (and to some degree formalisation) of existing good practice. There is a potential danger, however, that the strategic intent behind the policy making gets 'bogged-down' with parochial and non-strategic matters, any guidance should assist planning authorities in clearly determining what is of a strategic nature and therefore warrants a joint approach.

We are concerned that there is the potential for this to be an overly bureaucratic process. The consultation report indicates this is to address areas where local authorities have not successfully worked together under the duty to cooperate. In this context the Statement of Common Ground may be of less value, and there are already arrangements such as Secretary of State directions and call-in powers to address this particular problem.

Many authorises are actively working together through locally derived arrangements to address cross-boundary issues and find solutions. Requiring Statement of Common Ground for authorities that have not worked well together seems to be an ineffective response to these particular issues, and as such prescribing this in regulations may in fact overcomplicate things, and remove the options for locally derived solutions, reflecting local circumstances.

There is the potential for confusion in terminology with a Statement of Common Ground in relation to Section 73 appeals. Statements of Common Ground in relation to planning appeals set out where there is agreement and where there is disagreement between the parties. At the recent Planning Advisory Service events on this consultation that officers of East Devon District Council attended it was explained that this was intended to be a tool to capture the evidence needed to demonstrate compliance with the duty to co-operate. As such calling it some kind of tool, or a statement of co-operation would better reflect its purpose and also differentiate it from the Statement of Common Ground elsewhere in the planning system, avoiding any potential for confusion.

Question 7(b)

how do you consider a statement of common ground should be implemented in areas where there is a Mayor with strategic plan-making powers?

Please enter your comments here

On face value it is not clear why there should be any real difference between areas with a mayor and those without.

Question 7(c)

do you consider there to be a role for directly elected Mayors without strategic plan-making powers, in the production of a statement of common ground?

Yes

No

Not sure / don't know

Please enter your comments here

It would, on face value, seem appropriate for the mayor to have a role.

Question 8

do you agree that the proposed content and timescales for publication of the statement of common ground are appropriate and will support more effective co-operation on strategic cross-boundary planning matters?

Yes

No

Not sure / don't know

Please enter your comments here

The timescale might be reasonable where there is a clear expectation and guidance that Statements of Common Ground relate to strategic matters. However, if the aspiration (and perhaps guidance) points to such statements addressing matters that are non-strategic then the extra material they need to cover could make the timescales unrealistic.

It is also seems inevitable that the more planning authorities there are that need to be party to a statement the more time consuming and complex to produce they will become. The problems and challenges could be especially complex where there are many overlapping geographies and interactions operating in differing ways and directions across planning authority boundaries. Particular challenges could specifically arise if or where there are aspirations to accommodate one planning authorities housing or other development needs in another authorities jurisdiction and further challenges if (as might be assumed) statements need to be endorsed by local authority committee's; noting delay that committee cycles can generate.

Given challenges that any explicit timetable should generate it would be most relevant if they took the form of guidance rather than an explicit timetabled requirement. It should also be made clear that such statements do not require agreement on all issues, rather they should highlight where agreements exist and where there are differences of opinion (if any).

Question 9(a)

do you agree with the proposal to amend the tests of soundness to include that:

- i) plans should be prepared based on a strategy informed by agreements over the wider area; and
- ii) plans should be based on effective joint working on cross-boundary strategic priorities, which are evidenced in the statement of common ground?

Yes

No

Not sure / don't know

Please enter your comments here

It seems reasonable to add these in as tests of soundness so long as non-co-operation of a neighbouring authority does not unreasonably undermine the soundness of a plan. Co-operation does not necessarily mean agreement so perhaps i) should be amended to read “informed by agreements over the wider area where possible”?

The PAS workshop indicated that the intention of the Statement of Common Ground was to set out matters where there was cross-boundary agreement and equally importantly matters where there was not. The intention seemed to be that it would enable an Inspector to adjudicate if agreement could not be reached. As such, in areas where there is and remains disagreement, it is more akin to a Position Statement. How this would work in practice if different authorities are preparing their plans to different timetables requires further thought, and clear national policy/guidance on this would be helpful. Renaming this document a Statement of co-operation may better reflect its purpose.

Question 9(b)

do you agree to the proposed transitional arrangements for amending the tests of soundness to ensure effective co-operation?

Yes

No

Not sure / don't know

Please enter your comments here

It is not clear what the “range of intervention powers” that Govt may use where a Statement of Common Ground has not produced or maintained would be.

Question 10(a)

do you have any suggestions on how to streamline the process for identifying the housing need for individual groups and what evidence could be used to help plan to meet the needs of particular groups?

Please enter your comments here

In terms of affordable housing it would be helpful to breakdown any headline figures into constituent part. Although it is fairly standard practice to consider rented and intermediate housing needs, this no longer reflects the diversity and range of affordable housing, and non-market housing needs and available products. It would be useful for LAs to have an understanding of the need for social rented housing, intermediate products including shared ownership, shared equity, Help to Buy, and more innovative products such as Rent to Buy. The affordability of a Discounted Market Unit will depend on the amount of discount offered.

For example, in one scheme in East Devon we agreed a Deed of Variation that produced a smaller number of units at a 25% discount from market value, as this made the units more affordable in relation to local incomes, as opposed to a higher number of units with a lower value 20% discount. However, as the amount of affordable housing is assessed in terms of number of units, the first less affordable scheme was policy compliant, whereas the other scheme was not. The link between income and house prices when considering what constitutes affordable housing is very important. We welcome that the new housing needs formula is seeking to re-establish this by recognising that mortgage lending is available to a maximum of four times annual income.

There is also a need to understand and evidence the need for open-market rented housing and consider how the quantity and quality of rented housing can be improved. This is a particular issue facing areas with pressure from second homes, and high levels of in-migration of retirees.

A broader understanding of the component that make up older person's housing needs is also required. See our response to question 10b

Question 10(b)

do you agree that the current definition of older people within the National Planning Policy Framework is still fit-for-purpose?

Yes

No

Not sure / don't know

Please enter your comments here

It would be particularly helpful if the longstanding C2/C3 use class issue around older person's housing was resolved. We have spent many hours arguing about what constitutes housing with care, and what doesn't insofar as it relates to whether or not the developers are required to provide affordable housing, or are exempt. Like affordable housing older person's housing is now an umbrella term that covers a wide range of products from traditional care homes and sheltered housing with on-site warden, through to newer models

including Continuing Care Retirement Communities, Retirement Villages, and open-market housing subject to an age-restriction.

New models and products for older person's housing are emerging, some of which seem to be set up to specifically avoid the need to provide affordable housing. Whilst we support the need for planning to address the issue of an aging population, and support the need for integrating health and social care, enabling people to live at home longer and encouraging innovation and diversification within this sector, this should not be at the expense of affordable housing.

It should be recognised that many older people continue to live in open market owner occupied, owned with a mortgage, or rented accommodated, and it is unclear how remaining in your home and buying in a care package is materially different to moving to an age-restricted accommodation complex and doing the same. The current use class order fails to reflect the variety of housing products and options actually available in the older person's sector. Clarification on this matter would be helpful for all those involved, and avoid the need for this matter to be re-visited over and over again.

Question 11(a)

should a local plan set out the housing need for designated neighbourhood planning areas and parished areas within the area?

Yes

No

Not sure / don't know

Please enter your comments here

Whilst we note that the consultation advises that any housing targets for Neighbourhood Plans can/should be informed by higher tier plan strategies we would highlight the following key concerns in respect of potential for deriving neighbourhood plan requirements from district level assessments:

- a) Housing need assessments have greatest statistical validity when undertaken at larger scale geographies, this is part of the logic for defining and assessing at Housing Market Area levels. At the local authority level assessments can typically be expected to retain statistical validity but as geographical scales/areas for assessment become smaller so does the statistical robustness of assessment. By the point you get to Neighbourhood Plan level geographies (especially in parished areas) it would be very unlikely that the approach to calculation suggested (or potentially any other process) would retain any real degree of statistical validity.
- b) Local Plan strategies determined at and across a local planning authority area (or collective planning authority areas) should be and are the correct mechanism for determining the distribution of development and the notion of proportionate distribution of new housing based on distribution of the existing population runs counter to principles that underpin rational approaches to planning.
- c) It would down play issues of constraints to growth and opportunities for growth that sound planning responds to. Some neighbourhood plan making areas may be very

constrained and others full of opportunities, a blunt proportionate distribution approach would fail to respond to these considerations.

- d) It could be seen to pre-suppose that Neighbourhood Plans should be planning for housing growth. This may be right for some producing plans but not for others. It seems appropriate for neighbourhood Plan making groups to have the choice to determine whether or not they wish to plan for housing growth (if 'forced' some groups may choose to not prepare plans at all). It can be a very challenging exercise for Neighbourhood Plan groups to identify, assess and promote sites for development and undertake allied tasks such as Strategic Environmental Assessment and viability assessment.

We would highlight the approach in East Devon as a model of good practice that certainly overcomes the above concerns and we advocate this approach in the context of (to our understanding) having more Neighbourhood Plans in production (measured by areas designated) than any other local planning authority in England (bar the large unitary authorities). In East Devon we have a local plan that, through land allocations and other policies, meets (and exceeds) all of our housing needs; by default we have a target figure for Neighbourhood Plan to provide for but this target is zero (or more precisely a minimum of zero). As we have met our District wide needs we were able, through carefully constructed local plan policy, to allow and empower neighbourhood plan making groups to provide for extra housing through their plan, if they wish to, but not require them to plan for housing. Whilst we are aware that some planning authorities have chosen to 'delegate' numbers to Neighbourhood Plan making groups, and quite possibly some groups have requested that they fulfil the role (and perhaps there have been examples of success where this approach has been followed), it would be of concern if it became the standard default position for plan making and especially so through applying the approach suggested in the consultation document.

Question 11(b)

do you agree with the proposal for a formula-based approach to apportion housing need to neighbourhood plan bodies in circumstances where the local plan cannot be relied on as a basis for calculating housing need?

Yes

No

Not sure / don't know

Please enter your comments here

For the reasons set out in our East Devon District Council response to Question 11a we would not endorse the formula based approach to apportioning housing to neighbourhood plan bodies. To summarise our earlier comments:

- a) As proposed it would not be a statistically valid exercise to undertake;
- b) It would not reflect strategic approaches and thinking to the distribution of development;
- c) It does not recognise constraints to development and for opportunities for development that different areas offer; and
- d) It runs counter to the principle that plan making groups should be able to plan for housing if they want to but not if they do not.

Question 12

do you agree that local plans should identify the infrastructure and affordable housing needed, how these will be funded and the contributions developers will be expected to make?

- Yes
- No
- Not sure / don't know

Please enter your comments here

This is generally done already, but the specifics of contributions could be increased in detail at plan making stage if evidence and project progress allows.

The real challenge is that many IDPs identify significant shortfalls in funding requirements.

The current system therefore can unrealistically raise communities expectations of what can be delivered, and those that welcome additional growth because of the benefits and additional infrastructure that it will bring, can be disappointed when it turns out these things are negotiated away for viability reasons and/or were not deliverable in the first place. Whilst developers should make their appropriate contributions, they cannot be required to address existing shortfalls in provision.

Exemptions granted to self-builders etc. under CIL also undermines infrastructure delivery as they still have an impact but contribute nothing to the mitigation required.

Question 13

in reviewing guidance on testing plans and policies for viability, what amendments could be made to improve current practice? Please enter your comments here

East Devon has been fortunate to have the benefit of an in-house viability specialist over the last two years, supported with funding from the HCA. We therefore have the benefit of considerable experience of viability issues at the plan-making, outline permission, full and reserved matters permission, and section 106 variation applications including post development and post commencement appraisals. We would be happy to provide further detailed examples of the issues we have encountered if that would be useful. But for the purpose of this consultation response we have provided some key headline issues.

Delivery and Viability are not the same thing

The terms viability and delivery are used interchangeably with the current NPPF/PPG guidance despite them being fundamentally different things. Delivery of a scheme depends on many various other factors and as such viable schemes may still not come forward. For example, if there are a number of sites allocated in a particular market town each site may in itself be viable, but the local housing market would not have enough demand to absorb all the new housing if it was released onto the market all at the same time. Or, a significant land owner may have a number of sites in their ownership which are viable but only want to release them in phases, for land management or revenue, or tax efficiency reasons. It would be helpful for the revised NPPF to be clear that viability in this context refers to financial

viability appraisals, the purpose of which is to assess a schemes viability, and that this is different to the delivery of a scheme.

Assessing Viability

Our experience suggests developers give evidence at Local Plan Examinations that their sites are viable, but then argue things have changed when sites come in for planning permission. Whilst we acknowledge that there are some matters that do change, or emerge, during preparation of a proposal for the development of a site, it would be helpful if National Guidance could be clear on the factors that could be expected to have been taken into account by a developer. For example, we have received viability appraisals seeking to argue that the slope of the site was previously unknown, resulting in abnormal and unforeseen costs. The ability to argue viability at any and every stage of the development is particularly problematic, as is the lack of a requirement to provide a baseline viability appraisal, when seeking to argue something has changed.

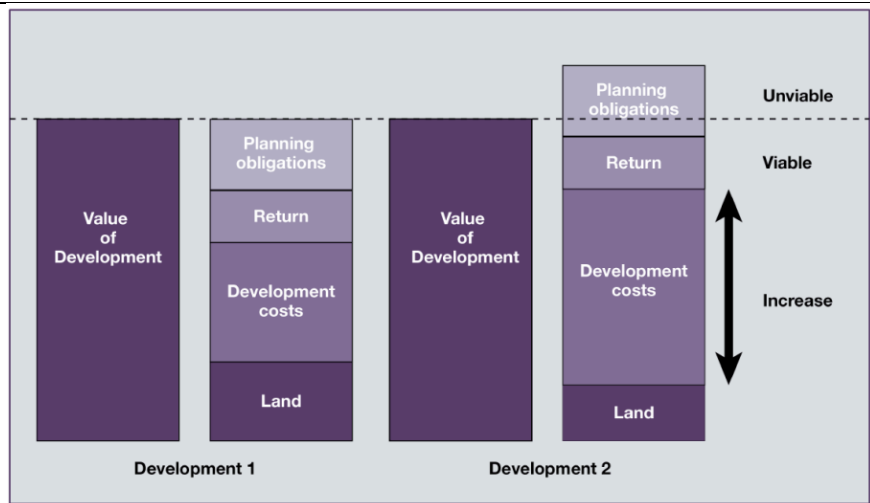
We would strongly disagree that “local authority have no way of assessing whether a developer’s claim that the site has become unviable is true or a negotiating tactic”. Many LAs request open-book viability appraisals, and then subject them to independent scrutiny via the in-house surveyors, external consultants and/or the District Valuer. Many provide policy/SPD and other guidance that set out the minimum evidence requirements, see for example our SPD on planning obligations <http://eastdevon.gov.uk/planning/planning-policy/planning-obligations-supplementary-planning-document-spd/> and our viability guidance notes <http://eastdevon.gov.uk/planning/planning-services/planning-development-management/viability-guidance-notes/>.

This process can however be time-consuming and expensive, and often just results in a report explaining professional differences of opinion, which are then further rebutted by the applicant. Where Councils require the applicant to pay for these costs, they can then be added into the viability appraisal as a cost against the scheme. In terms of risk and reward, many developers seem content to spend a few thousand pounds commissioning a viability report, and then a few more thousand pounds having it independently reviewed, although this is perhaps understandable as they do stand to save, in some cases, millions on affordable housing or other contributions, if successful.

Our experience suggests that getting viability reports is not the challenge, it is understanding them, what they can do, what are their limitations, what you do with the information, and how you apply them to planning, that is the challenge. Although East Devon has benefitted greatly from in-house viability expertise being embedded within the planning department, this highlights a much wider viability skills and capacity issue. Our experience suggests that planners do no need to be able to undertake viability appraisals themselves, but do need to be able to understand the viability assessments processes, including their limitations, and be able to interpret and explain the findings. The upskilling of current planning staff, and access to free or low price locally available viability training is essential.

Improving Viability

The various definitions of Viability in the Harman Report, NPPF, PPG and RICS Guidance all refer to policy and regulatory costs/the costs of planning obligations being included as a component of viability. The plan-led system should enable planning policy requirements to be known and factored in, however the much quoted diagram explaining viability always shows it is the planning costs, and not paying too much for the land, wanting too large a profit, or excessive costs as being the cause of viability issues.



This diagram also fails to recognise that planning delivers public benefits that can increase the value of development, for example being in the catchment area of a good school is known to inflate house prices. Likewise the front-loading and delivery of public infrastructure, can also increase the value of development, as can better design, changing the size, type and tenure of housing and various other factors. If there is an identified viability issue, there are therefore many potential ways that viability of a site may be improved, rather than defaulting to accepting a lower amount of affordable housing, or the waiving/loss of other planning requirements.

Negotiating to improve viability however takes time and requires a particular skill set. It is also often not in the developers' interest to do so, as they stand to benefit from getting out of providing affordable housing or other requirements. It should also be noted that as CIL is a non-negotiable charge, the system prioritises district wide infrastructure over affordable housing and site-specific planning provision. Even though it is these local benefits that are most likely to help the community see the benefits of new development.

Reasonable Returns for Willing Land Owners and Developers

Our viability experience to date suggests the biggest areas of disagreement in relation to viability relate to what constitutes a reasonable return for the landowner and a reasonable return for the developer. Many of the other costs and values used in Viability Appraisals, are easier to evidence and justify, for example allowances for fees, finance, marketing costs can reference industry norms, local house price data can be evidenced with reference to publically available information on the internet, on sites like Zoopla and Rightmove, and build costs can refer to BCIS indices.

Although these factors may still be subject to debates about interpretation and relevance of the information, at least the evidence behind them is not contested. Whilst further prescription on these inputs may seem attractive as a way of reducing the complexity of viability appraisals, our experience indicates that there is merit in leaving room for local debate and interpretation of the figures. For example, BCIS data does not include information from volume house-builders who can benefit from economies of scale. As such the BCIS data is perceived to be over-estimating the development costs for larger sites. Likewise, in very rural areas there they may be limited data on house prices, leading to questions in terms of its reliability. As such we would welcome national policy/guidance on the level of information required and the need for a clear and transparent explanation of how the figures have been derived from this evidence, rather than any attempts to nationally prescribe the input figures themselves.

Developer's Return

In relation to what constitutes a reasonable developer's return, the District Valuer consistently recommended to us that 18% for open market housing and 6% for affordable housing was a reasonable return. This however has been continually challenged by developers who quoted appeal decisions which found in favour of a 20% profit of GDV. This 20% is quoted as if it has become a kind of rule of thumb, informed in large part by decisions of the Planning Inspectorate. Again there is a temptation to think specifying a specific profit level, or range of levels, in national policy/guidance would help to simplify the system. However our experience indicates this may be a significant oversimplification for a number of reasons.

Firstly, the amount of profit required to bring the scheme forward is a reflection of risk. Risk, however is factored into viability appraisals in many different ways, from the adoption of an optimistic or pessimistic approach to a range of different costs, the inclusion of a higher or lower level of contingency and if this is broken down in specific elements or applied to the whole scheme, the amount allowed for known, or anticipated, abnormal costs and even the stage at which a viability appraisal is undertaken, and the level of buffer applied to its findings. This means the viability appraisal, and its supporting evidence and explanation, need to be considered in the round. The profit level itself is only one element of how appraisals adjust for risk and it would be useful if national policy/guidance were amended to specifically recognise this.

Secondly, the level of profit a developer requires will depend on a number of factors, including geography, size of business, company structure, and how they access their finance- which is in itself affected by many factors including gearing ratios, assets, track record and total risk exposure and such like. Having received representations in relation to specific sites and in response to our Planning Obligations SPD that some developer's funders would not make funding available at less than 20% profit we took the opportunity to speak to some funders directly.

The funders we spoke to concurred that some schemes would be fundable at less than 20% profit on GDV, but cautioned that in some markets, and for some products and for some developers, most notably new entrants to the market without an established track record, 20% profit would not be enough to off-set the risk. We therefore think any discussions and recommendations around acceptable profit levels need to be informed by lender requirements, and that any such requirements need to be in the public domain. This seems particularly important in light of other government initiatives to diversify the house-building sector and encourage new entrants to the market. Risk and required profit also fluctuate with economic cycles.

The third issue around developer's profit links back to the uniqueness of each site, and the requirement for each and every planning application to be considered on its merits. This raises questions around the applicability of the 20% profit figure that is often quoted in relation to other appeal decisions, which may on closer inspection be inaccurate. If you trace back through the actual appeal decisions quoted, rather than relying on their selective quoting in some viability appraisals, you can see for example that the frequently quoted 20% profit level in the Shinfield case is actually somewhat of an oversimplification of the issue.

The Shinfield appeal decision APP/X0360/A/12/2179141 actually explains that the appellants supported their calculations in relation to an acceptable level of developer's profit by providing letters and emails from six national housebuilders who set out their net profit margin targets for residential developments. The figures ranged from a minimum of 17% to 28%, with the usual target being in the range 20-25%. The Inspector noted that those that

differentiated between market and affordable housing in their correspondence did not set different profit margins, and found that due to the level and nature of the supporting evidence it could be given great weight it.

The Shinfield Inspector concluded that the national housebuilders' figures in relation to an acceptable level of profit were to be preferred, when compared against the figures presented by the LA, and as such a figure of 20% of GDV, which the Inspector noted was "at the lower end of the range", was found to be reasonable. Despite the fairly unique characteristics of the appeal site, its planning history and previous uses, we have found Shinfield quoted as if it were a government planning policy by viability experts advising both applicants and Councils.

Landowner's Return

Although the PPG on viability states that 'the most appropriate way to assess land or site value will vary' there are in fact really only two recognised methodologies for arriving at land value, that are useful in this context- the comparative method and the Residual Land Valuation (RLV) method. RLVs can be used in several ways:

- By calculating the potential receipts (known as Gross Development Value-GDV) from the development, less the development costs (including planning contributions, interest payment and the minimal level of profit required), RLVs can be used to calculate what price could be paid for the land.
- By calculating the potential receipts (GDV) from the development less, the development costs (including planning contributions, the cost of the site and interest payment), a RLV can be used to calculate the level of profit that the scheme would generate.
- By calculating potential receipts (GDV), less development costs (including the cost of the site, interest payments) and the required level of profit, a RLV can be used to calculate the amount of money available in the scheme to make planning contributions.

RLVs are therefore just calculations, albeit presented in as excel spreadsheets, or using specialist viability software such as Argus. As with all calculations the outputs are only as good as the information fed in, and viability appraisals and reviews often result in seemingly endless debates and disagreements about these inputs. Where an RLV is used to calculate a land value, the main challenge for the process is not actually arriving at the land value, which is the output of the process, but rather deciding if this represents a reasonable return for the landowner assuming a willing seller and a willing buyer, as required in the NPPF/PPG.

The PPG states that 'in all cases, estimated land or site value should:

- reflect emerging policy requirements and planning obligations and, where applicable, any Community Infrastructure Levy charge;
- provide a competitive return to willing developers and land owners (including equity resulting from those building their own homes); and
- be informed by comparable, market-based evidence wherever possible. Where transacted bids are significantly above the market norm, they should not be used as part of this exercise.

If the intention of the plan-system is to require developers and landowners to take into account the infrastructure, affordable housing and other requirements in arriving at an appropriate land value, this could be expected to have an impact on land values. However, seeking to use the current land values as a sort of 'common sense check' creates a tension and contradiction within the methodology. Our experience indicates that the land market

works in a way that results in land (in almost all cases) being sold to the highest bidder, and this in itself serves to drive up prices. Landowners' expectations also frequently include an element of hope value, and there are debates around how much of any hope value is 'reasonable'. However, even setting aside this issue, and assuming comparable, market-based evidence is available, for the many comparisons to be valid the current land market would need to have taken into account the planning policy requirements.

The RICS Research report on Financial Viability Appraisal
http://www.rics.org/Global/Financial_Viability_Appraisal_200415_dwl_aj.pdf

in Planning Decisions: Theory and Practice highlights this problem, concluding that "if market value is based on comparable evidence without proper adjustment to reflect policy compliant planning obligations, this introduces a circularity, which encourages developers to overpay for sites and try and recover some or all of this overpayment via reductions in planning obligations." This conclusion reflects our experiences, and combined with the opportunity presented in the current guidance for developers and/or landowners to simply say 'at that level I am not willing to proceed' seems to stack things in favour of viability being used to negotiate required planning contributions away.

The RICS 2014 research report also highlights the challenges and contradictions in current planning and surveying guidance, in relation to assessing land values. The contradiction between planning and surveying guidance is most noticeable in terms of Threshold Land Value as advocated by Harman, and rejected by RICS.

Harman v RICS

Harman: We recommend that the **Threshold Land Value** is based on a premium over current use values and credible alternative use values.

RICS: **Threshold land value.** A term developed by the Homes and Communities Agency (HCA) being essentially a land value at or above that which it is assumed a landowner would be prepared to sell. It is not a recognised valuation definition or approach.



There are also other tensions, and debates around approaches, methods and terminology highlighted in the 2012 RICS guidance
http://www.rics.org/Documents/Financial_viability_in_planning_1st_edition_PGguidance_2012.pdf

For example the definition section defines EUV+, Existing Use Value (Plus a Premium) as a term "used by some practitioners for establishing Site Value. The basis is as with EUV but then adds a premium (usually 10% to 40%) as an incentive for the landowner to sell. However, it does not reflect the market and is both arbitrary and inconsistent in practical application". EUV is defined as "the estimated amount for which an asset or liability should exchange on the valuation date between a willing buyer and a willing seller in an arm's-length transaction after properly marketing and where the parties had each acted knowledgeably, prudently and without compulsion, assuming that the buyer is granted vacant possession of all parts of the property required by the business and disregarding potential alternative uses and any other characteristics of the property that would cause market value to differ from that needed to replace the remaining service potential at least cost. It is an accounting definition of value for business use and as such, hypothetical in a market context, as property generally does not transact on an EUV basis".

Similarly CUV+ Current Use Value (Plus a Premium) is defined as being "used by some practitioners for establishing Site Value. The basis is as with CUV but then adds a premium

(usually 10% to 40%) as an incentive for the landowner to sell. However, it does not reflect the market and is both arbitrary and inconsistent in practical application". Current use value is defined as "Market value for the continuing existing use of the site or property assuming all hope value is excluded, including value arising from any planning permission or alternative use. This also differs from the Existing Use Value. It is hypothetical in a market context as property generally does not transact on a CUV basis".

Perhaps unsurprisingly, the matter of land values has therefore been subject to significant debate, particularly at some planning appeals. All that is clear at the moment is that there are various methodologies for arriving at these different ways of establishing land value, there is no consensus on which one, if any, is most appropriate for use in viability appraisals for planning, or indeed if and how these different ways of establishing land value relate to the idea of a reasonable return for a willing landowner.

The tension between planning policy as set out in the NPPF, and supported by the PPG, and many adopted Local Plan policies, when set against other non-statutory guidance including that from RICS causes particular problems for practitioners, particularly as the RICS guidance and the RICS research report can in themselves constitute material consideration for the purpose of determining planning applications. Selective quoting of various different appeal decisions can lend support to some, all or none of these methodologies.

Is there such thing as a Shinfield method?

The Shinfield case has also spawned yet another way of determining an appropriate return for the landowner, a 50:50 split between the uplift in value between the developer and the community. Again, the context of the appeal needs to be understood in that the appellant already owned the site, but still argued that any viability calculations still needed to include an incentive for the landowner to bring the site forward, and the Inspector agreed with this particularly as the site was subject to "significant levels of contamination".

In the Shinfield case the Inspector was presented with an appellant's methodology that argued a 50% split in the uplift in value of the site represented a reasonable return for a landowner, as opposed to the Council's position that "the landowner should be content to receive what the land is worth" which the Inspector concluded would provide no incentive to bring the site forward. Each site must be considered on its merits, and it was in these very particular circumstances that the 50:50 split in uplift of value was found to be a preferable developer's return when compared against the Council's position that no incentive was needed, in short 100% of any uplift should go to the community.

The Shinfield decision has spawned an entirely new method of calculating land value and an acceptable developer's return, based on a 50:50 split in the uplift in land value. This is despite the fairly unique circumstances of that particular site, and a recognition that the 50:50 split was entirely arbitrary. For example, another Inspector considering a proposed development at Oxenholme Road, Kendal, Cumbria (APP/M0933/A/13/2193338) observed that a 'competitive return' is not further defined by the NPPF, and could be the subject of differing interpretations by the parties involved in any particular development.

The Oxenholme Road decision, explains that assessment of a competitive return will involve an element of judgement. Noting however that excessively ambitious predictions must be tempered by comparison with industry norms and local circumstances. Paragraph 47 of the appeal decision states "reference was made to an appeal decision for land at Shinfield, Berkshire". It continues "little weight can be given to that decision in the present case, as the nature of the site was quite different, being partly previously developed, and the position taken by the parties on the proportion of uplift in site value that should be directed to the

provision of affordable housing were at odds with those now proposed. There is no reason in this present case to assume either 100% or 50% of the uplift in site value is the correct proportion to fund community benefits.

We now receive many site specific viability which refer to the Shinfield planning appeal saying, for example “the Inspector determined that a competitive return for the landowner was deemed to equate to a 50:50 split in the uplift in value between the community and the landowner”. Likewise, we are aware of several whole plan viability reports that have been undertaken using this method of calculating a reasonable developer’s return, and more in the pipeline.

The RICS Research report on Financial Viability Appraisal in Planning Decisions: Theory and Practice also refer to the Shinfield decision observing that “instead of trying to determine a threshold value that would induce the landowner to deliver the site to the market, and a target level of planning obligations that the local authority requires, the uplift is simply shared in some way between the parties”. However in it’ conclusions on page 25 it observes that “the decision in the Shinfield case amounted to a proportionate sharing of the land value uplift, essentially a tax on development gain. Therefore despite some of the advantages of this method approach, it might be viewed as a politically difficult solution to implement”.

Suggested Changes to the Guidance on Landowner and Developer’s return

The various different ways of calculating a reasonable return for the landowners (EUV, EUV+, CUV, CUV+, Shinfield method, comparing against Alternative Use Value) are challenging enough for the professionals involved to get a handle on, and must be even more challenging for communities and members of the public. The lack of clarity and guidance in national planning policy, results in different applications of this concept to decision-making, and now increasingly also different methods being used to undertake plan-wide viability testing.

Landowner returns are a significant area of debate and disagreements resulting in endless discussions that use up scarce time and resources. We would therefore welcome clarification as to whether the Shinfield decision is a specific planning appeal and should be treated as such, or if the methodology that has developed from that appeal decision is a reasonable way to apportion uplift in land value and therefore represents an appropriate methods for calculating the developer’s return. If is the latter clarity on if the split is 50:50 split should be applied in all cases, or whether or not it should be subject to local determination as suggested by the Oxenholme Road appeal, would be most useful.

The biggest challenge relates to landowner’s expectations. If a developer attends a planning inquiry and argues that the landowner is not willing to sell the land at the price the viability report indicates they should do then it is all too easy for an Inspector to conclude that of course this means the landowner is not willing. The reference in the guidance to willing developer making a reasonable return and a willing land owner making a reasonable landowner either needs considerable further guidance, or, as would be our preference, the reference to a willing landowner and a willing developer could be removed from the guidance all together. Our experiences suggests it is the concepts themselves that are unhelpful and they in fact serve to reinforce the circularity argument, driving up land values and landowners returns at the expense of community benefits and infrastructure. It may also be worth noting that there is already a valuation process in place for determining land values when a landowner is unwilling, that is used for the CPO process.

Re-appraisals and Overage

Rather unusually East Devon District Council's adopted Local Plan Strategy 34 includes a requirement for overage in all cases where viability is used to justify a lower proportion of affordable housing. Our approach to applying this in practice requires the submission of a Development Account, showing evidence of actual costs and values, and overage is only payable where super-profit has been made. We define super-profit as profit in addition to the % of GDV that was accepted to be a reasonable developer's return in the viability appraisal.

Our adopted policy appears to have caused significant confusion in the development industry, who have misunderstood the Development Account, submitted after the development has been built, to a viability re-appraisal undertaken before development commences, or the case of DoV submitted when a scheme is on site, but before it is complete. Again, this is an issue where the RICS guidance is frequently quoted as if it was adopted planning policy, rather than advice to surveyors. Although, East Devon is confident that the plan-led system means we can and should rely on and have confidence in our adopted policies, further clarification of this in national policy/guidance may help to underline this.

The repeal of Section 106BA and its supporting guidance

Despite this being repealed, and therefore the guidance supporting it also no longer being valid, we still receive viability appraisals that refer to this <https://www.gov.uk/government/publications/section-106-affordable-housing-requirements-review-and-appeal>

The guidance was helpful in the way it clearly required developers to set out what had changed and why.

Conclusions

In our view, the changes currently suggested in this consultation do not in fact actually seem to change the system much at all. The most confident LAs have already been using the current policy and guidance to argue that developers should have factored in the requirements of planning policy into their schemes, as the definition of viability suggests, and requiring developers to prove what if anything has changed that affects viability.

The consultation question seems to limit itself to thinking about Local Plan viability testing, however the whole viability process needs to be considered to understand the issues and challenges currently faced in practice, and the possible solutions to them. Changes informed by only a piecemeal understanding of the issues are unlikely to be successful or robust.

The single biggest improvement to the viability appraisal process would be for there to be a clear understanding set out in policy and guidance that it is expected developer's purchased, acquired or optioned sites on the basis that they were capable of accommodating a viable and deliverable policy-compliant scheme, as to assume anything else is entirely nonsensical. As such there should then be a statutory requirement for developers to clearly set out what factors (if any) have changed since they acquired the site, that could not reasonably have been anticipated by a developer exercising due diligence (which would include for example reading the current adopted Local Plan and establishing the content and timetable of emerging policies, and should include talking to the planners and housing officer about the site), before there is any requirement for a LA to enter into discussions around viability.

The second biggest improvement would be a clear requirement for developer's to demonstrate that they have sought to ensure that their scheme is viable, through potential redesign, changing house types, reviewing costs and values etc. as part of viability negotiations, rather than viability issues to automatically result in a reduction in affordable housing and other contributions. This will require LA resources to facilitate.

Question 14

do you agree that where policy requirements have been tested for their viability, the issue should not usually need to be tested again at the planning application stage?

Yes

No

Not sure / don't know

Please enter your comments here

Policies are tested at Examination to understand whether the Local Plan is deliverable as a whole and that generally policies will be viable. It cannot be expected to foresee every single circumstance. A good site that has support of the public, Members and planners could struggle to meet certain policies and remain viable if it is a difficult site (e.g. brownfield site that has lay empty for years) but it might not have been allocated or been integral to the plan so wasn't specifically tested. This could preclude it from being brought forward. Unless it is intended that this rule would push sites such as this down the Brownfield Register and PIP route? What does "usually" mean and where would you draw the line?

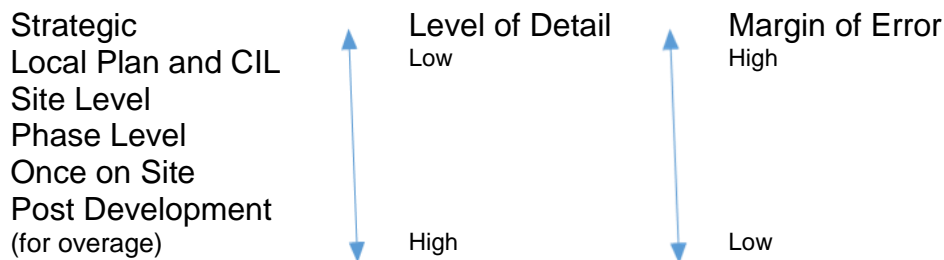
Although we welcome the intention to improve plan-wide viability work, we are unconvinced that this will in practice avoid/reduce the need for site by site viability discussions. Our experience to date suggests that there are some genuine reasons why the viability of a particular scheme changes, however there are also many 'viability issues' referred to that a competent responsible developer should have been aware of when acquiring the site, and/or securing funding for its development.

Viability appraisals and valuations are an art not a science, and are informed by professional judgements. Viability appraisals can therefore end up being an argument between two surveyors about a spreadsheet, one employed by a client who stands to benefit from the figures painting the worst possible picture, and therefore probably and reasonably adopting a cautious/pessimistic view, versus one seeking to secure the most amount of public benefit possible who may try to establish things are not as bad as are suggested. This results in inevitable disagreements in relation to inputs, assumptions and outputs, and how much money the developer and landowners can reasonably make. In such cases there simply is no 'right' answer. Two surveyors simply have two different views.

Plan-wide viability appraisals are an amalgamation of different site specific viability appraisals. Many plan-wide appraisals test a range of notional, or hypothetical sites, and then apply various policy requirements to see where the combination of requirements may start to undermine viability. At this higher level, there is less certainty around the inputs and outputs and therefore more need for assumptions. This is recognised and reflected in the application of a buffer to take into account this uncertainty. Viability appraisals therefore, can and frequently are, undertaken at various stages of the planning process. They can be seen as sitting on a continuum, where the level of detail increases as a scheme becomes

more concrete, and this is inversely related to a margin of error and need for a buffer/contingency.

The Viability Continuum



We think it would be particularly helpful for any new policy/guidance to recognise this distinction, which in turn may give LAs greater confidence in negotiating around viability. At a plan making level, they can identify issues that are likely to make a scheme unviable, but they do not guarantee a site is viable. Indeed as the methodology acknowledges it is not necessary to prove that all sites are viable. As such it is open to developers to argue that their particular site is not viable. However, simply saying a site is not viable and submitting a viability appraisal to demonstrate this should only be the first part of any viability process. An understanding of why the site is not viable and what can be done to improve viability is then required.

If the viability issues identified at a site-specific level are in fact something new and unexpected, it may well be reasonable to reconsider the policy requirements placed on the scheme, but this should be considered alongside other measures which may improve things. However, if the factors used to make the viability arguments could have been reasonably foreseen then a firm rebuttal of any requests to under provide against planning policy requirements is fully justified. This focus and understanding of what has changed in relation to the viability of the site would seem to be the key to re-establishing the public's confidence in the viability system.

We concur that viability has become somewhat of a 'game' which until recently seemed to be stacked in favour of the developer. We are heartened that some recent appeal decisions have been giving increasing weight to the need for developments to deliver sustainable communities, and the benefits that planning is seeking to secure. The 'evidence' offered by site specific Viability Appraisals should not be the only consideration.

It would seem particularly useful for policy/guidance to define what could and could not reasonably be described as an unexpected factor impacting on viability. For example, the slope of a site, it's relation to the floodplain or the presence of a listed building on site or nearby and the issues and costs of such matters could reasonably be expected to have been foreseen by the developer when they acquired or optioned the site. Likewise the policy requirements and CIL rates should be known and factored in, especially when options or contracts are conditional on securing planning permission. There are occasions when circumstances genuinely change for example the impacts of the recession on house prices and the cost of finance. However, our experience suggests many of the so called viability factors quoted could and should have been taken into account by a developer, exercising due diligence, when they purchased a site and/or drew up their scheme.

Question 15

how can Government ensure that infrastructure providers, including housing associations, are engaged throughout the process, including in circumstances where a viability assessment may be required?

Please enter your comments here

These organisations should already be consulted early in the plan making and viability assessment processes as interested parties and representatives of the relevant industries. Policy and legislation could be amended to specifically mention these types of organisations if necessary but I think this already happens.

The intention of this question is to get Housing Associations to provide objective information in relation to costs and values for the process of informing viability appraisals. Whilst this may be useful in some circumstances the very fact these developers are Housing Associations is likely to affect some of their costs and values, in a way that limits their comparability with private sector developers. Those housing associations that have profit making arms and/or provide open market housing may be more comparable. A clear requirement in policy for developers to go open book and evidence the figures in they use in their viability appraisals, would be much more useful.

Question 16

what factors should we take into account in updating guidance to encourage viability assessments to be simpler, quicker and more transparent, for example through a standardised report or summary format?

Please enter your comments here

All viability assessments should be made “open book” and published with other documentation submitted during a planning application. A standardised approach would be welcome but it is difficult to standardise an approach to calculating costs, values and other assumptions as at the planning application stage these are very site specific.

Question 17(a)

do you agree that local planning authorities should set out in plans how they will monitor and report on planning agreements to help ensure that communities can easily understand what infrastructure and affordable housing has been secured and delivered through developer contributions?

Yes

No

Not sure / don't know

Please enter your comments here

It would be desirable, in principle, for planning authorities to have a mechanism in place for reporting on planning agreements and relevant Section 106 contributions. However to retrospectively look back and report on all past contributions would be a very complex issue so any system should therefore be forward looking and not retrospective. There is also potential for confusion in the public's eye in that whilst agreements may be made not all sites are developed, or subsequent variations may arise (often on account of subsequent viability assessments) and for many authorities it should be noted that Section S106 contributions are increasingly only being required from a small number of sites as CIL takes on greater importance and it has its own reporting requirements as set out in Regulations.

Question 17(b)

what factors should we take into account in preparing guidance on a standard approach to monitoring and reporting planning obligations?

Please enter your comments here

Whilst we would endorse transparency in reporting any guidance needs to take into account the complexities of the task, especially when looking backward to past agreements signed.

It is highlighted that there are other agreements that exist, other than under Section 106. It should also be noted that third parties can also be party to Section 106 agreements with alternative options within such agreements and as such it can be difficult to precisely record the nature of agreements and what may be spent and, particularly in the past, with many applications sometimes contributing to project lines of reporting could become complex.

Any reporting should be in the form of a standard report to Members on an annual basis detailing the number of agreements signed (and what they include), along with a summary of the planning obligations that have been received, what has been spent, and what is available to spend. The report could then be published on the authorities web-site as a record for the public.

Question 17(c)

how can local planning authorities and applicants work together to better publicise infrastructure and affordable housing secured through new development once development has commenced, or at other stages of the process?

Please enter your comments here

Through press releases. Through site boards on the development site detailing the infrastructure and affordable housing being provided as part of that development. Within the sales details. It is of relevance, however, that developers in respect of advertised and advised on agreements may sometimes seek to renegotiate or renege on making agreed contributions. This should be avoided and can be of particular concern to purchasers of properties who may have made decisions to purchase on the strength of agreements in place; there should be consumer rights in place.

Question 18(a)

do you agree that a further 20 per cent fee increase should be applied to those local planning authorities who are delivering the homes their communities need? What should be the criteria to measure this?

Yes

No

Not sure / don't know

Please enter your comments here

Fee increases are important to ensure that planning departments are sufficiently staffed with the numbers of people and skills necessary to deliver Local Plans and development effectively. Increasingly planning departments (and Councils in general) have to rely on external expertise on key issues such as ecology, landscape, conservation and design and those departments that do have such expertise in-house generally find these resources to be unreasonably stretched. Reliance on such expertise is essential to delivering quality sustainable development and making informed decisions.

A lack of in-house expertise and over-stretched in-house expertise can have a detrimental impact on the time taken to make decisions. That being the case it is imperative that fees are increased. However, applying a further increase in fees only to those LPAs that are meeting their needs seems perverse. These authorities are already meeting their needs whilst authorities that are not meeting their needs are probably more in need of additional funding to improve their ability to meet needs, speed up decision making and improve quality. There should instead be a system that provides these struggling authorities with additional resources on the proviso that it increases the rate of delivery of plans and new homes, whilst still rewarding those that do deliver (?).

There would also seem to be merit in exploring the sharing of resources between authorities perhaps through a local/sub-regional delivery team of specialist technical officers/advisors. Where one authority may not be able to justify its own full-time in-house

expert, a group of authorities may be able to do so. It should also be recognised that many of these skills are in short supply including experienced planners, surveying, design, viability and other skills. This combined with time-limited capacity funding leads to a reliance on temporary or fixed term contracts, which cause issues in terms of staff recruitment and retention. Likewise, the need for market supplements to attract and retain these skills in the public sector, whilst often necessary, can add significant delays to the recruitment process and also serves to drive up costs. A proper understanding of the costs of skilled staff is needed, and resources should be made available to secure this. The opportunities for developers to contribute to enhanced services is worthy of further consideration.

Alternatively, Local Planning Authorities should be given powers to set their own planning fees. This could be based on a cost recovery basis to ensure that the fees only cover the cost of providing the planning service.

Question 18(b)

do you think there are more appropriate circumstances when a local planning authority should be able to charge the further 20 per cent? If so, do you have views on how these circumstances could work in practice?

- Yes
- No
- Not sure / don't know

Please enter your comments here

See above regarding applying further increases to authorities that are not meeting their housing needs. – it reads: Fee increases are important to ensure that planning departments are sufficiently staffed with the numbers of people and skills necessary to deliver Local Plans and development effectively. Increasingly planning departments (and Councils in general) have to rely on external expertise on key issues such as ecology, landscape, conservation and design and those departments that do have such expertise in-house generally find these resources to be unreasonably stretched. Reliance on such expertise is essential to delivering quality sustainable development and making informed decisions. A lack of in-house expertise and over-stretched in-house expertise can have a detrimental impact on the time taken to make decisions. That being the case it is imperative that fees are increased. However, applying a further increase in fees only to those LPAs that are meeting their needs seems perverse. These authorities are already meeting their needs whilst authorities that are not meeting their needs are probably more in need of additional funding to improve their ability to meet needs, speed up decision making and improve quality. There should instead be a system that provides these struggling authorities with additional resources on the proviso that it increases the rate of delivery of plans and new homes.

If the system has to be based upon performance, then using the Government's own performance targets in terms of determining 60% of Majors within 13 weeks and 70% of all other applications within 8 weeks would be the most logical approach.

Question 18(c)

should any additional fee increase be applied nationally once all local planning authorities meet the required criteria, or only to individual authorities who meet them?

- Apply nationally
- Apply to Individual authorities only
- Not sure / don't know

Please enter your comments here

It is important that all local planning authorities are properly resourced but equally there is merit in rewarding those who meet the requirements and providing incentives for doing so.

Question 18(d)

are there any other issues we should consider in developing a framework for this additional fee increase?

Applying it to all authorities to ensure improved resources and performance across the board.

Question 19

having regard to the measures we have already identified in the housing White Paper, are there any other actions that could increase build out rates?

- Yes
- No
- Not sure / don't know

Please enter your comments here

There should be a test on developers so that where proposed delivery rates are not being met or where sites/permissions are land banked and open book viability appraisal shows there is no issue then they are penalised.

We would welcome clarification on the government's approach to CIL and Section 106. The lack of certainty on if and when changes will happen has been problematic. There are issues with Section 106 pooling restrictions that undermine delivery. The complexity of the CIL regulations and challenges with how CIL works in practice are also serving to frustrate

delivery. The index linking of CIL rates to a BCIS index that requires a license to access also seems at odds with the government's drive to increase transparency.

The issue of Vacant Building Credit has also proved problematic. In our experience many developers are seeking to claim it even when the 'vacant' period of time is in fact an inevitable part of the development process. For example, across Devon a significant landowner undertook an asset review, through this they decided that some sites in their ownership were no longer required and these sites were put up for sale, and they were purchased/optioned by developers. As the sites were sold or optioned with vacant possession, the developers are now seeking to claim VBC on all of the sites. Our understanding was that VBC was intended to incentivise development of brown-field land and sites that are genuinely 'vacant/derelict'. Our experience suggests that in fact it is being used by developers to 'get out' of making the required affordable housing provisions. Further clarification on this issue in policy/guidance would be helpful, as we do not think it was the intention of the VBC, that it could be used to reduce AH contributions on viable and deliverable sites.

Report to: **Strategic Planning Committee**

Date of Meeting: 6 November 2017

Public Document: Yes

Exemption: None

Review date for release None

Agenda item: 9

Subject: **Infrastructure Delivery Plan – Review 2017**

Purpose of report: To outline the findings of the Infrastructure Delivery Plan – Review 2017, updating the previous study that was published in March 2015.

Recommendation: **That the Committee:**

- 1. notes the Infrastructure Delivery Plan – Review 2017; and**
- 2. approves the publication of the Infrastructure Delivery Plan – Review 2017.**

Reason for recommendation: To ensure that the Council has published up to date information relating to infrastructure delivery within the district. This information will be used to support the delivery of the Local Plan; and inform the emerging Cranbrook Plan.

Officer: Keith Lane, Planning Policy Officer
Email: klane@eastdevon.gov.uk
Tel: 01395 571684

Financial implications: All relevant financial implications are considered and contained within the body of the report.

Legal implications: The Infrastructure Delivery Plan Review 2017 is a technical document which the Council is required to regularly review, thereby ensuring delivery of the Local Plan and inform the emerging Cranbrook Plan there are no direct legal implications arising from the report.

Equalities impact: Low Impact

Risk: Low Risk

Evidence relating to infrastructure issues should be updated regularly to inform and support the delivery of future development in the area, as set out in the adopted Local Plan and emerging Cranbrook Plan. Whilst there is a low risk of presenting this information, failure or delays to the delivery of the identified infrastructure projects (particularly those identified as 'priority one') could have a significant impact upon the delivery of new housing and economic development.

Links to background information:

- Cranbrook Plan 'preferred approach' document (see item on this agenda)
- [CIL Governance and Planning Obligations SPD - Strategic Planning Committee reports \(March 2017\)](#)



- [Adopted CIL Charging Schedule and Regulation 123 list](#)
- [East Devon Local Plan 2013-2031 \(adopted January 2016\)](#)

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

Report in full

1. Introduction

- 1.1 The creation of sustainable communities is dependent upon the delivery of infrastructure alongside new housing and economic development. Evidence relating to infrastructure requirements is key to inform and support the delivery of the adopted Local Plan, and the emerging Cranbrook Plan.
- 1.2 Aside from being a technical planning document the Infrastructure Delivery Plan (IDP) is an important document that shows the significant shortfall in infrastructure funding that exists in East Devon. It has been produced in partnership with infrastructure providers such as the NHS, Devon County Council, Network Rail, Highways England etc and should be used to aid high level discussions with these agencies and funding agencies including the government to ensure that all parties understand the importance of the infrastructure listed in the document to successful delivery of development and are fully signed up to contributing to the delivery of these projects.
- 1.3 The council published an Infrastructure Delivery Plan (IDP) in March 2015 which informed the then emerging Local Plan. The IDP should be updated on a regular basis and respond to changes relating to the completion of infrastructure projects, opportunities from new development, and as the context and pressures change over time. Given this, in late 2016, officers commenced work on a review of the IDP.
- 1.4 The IDP Review was prepared in consultation with numerous stakeholders, including a range of infrastructure and service providers, other local authorities, and town/parish councils across the district. It covers a wide range of infrastructure types, including transport, utilities, education, sport and recreation, public services, and healthcare.
- 1.5 The IDP Review 2017 comprises a written report that provides the context for infrastructure planning; describes the infrastructure types and how they are funded and delivered; and then sets out the current infrastructure provision and future requirements for each of the main settlements in East Devon. It is supported by an appendix that details the schedule of required infrastructure projects. As set out in the Strategic Planning Committee CIL Governance report (March 2017), the IDP should be used when considering bids for CIL funds.
- 1.6 It is important to note that whilst the council may wish to secure the delivery of all infrastructure items identified in the schedule, funding constraints mean that prioritisation is necessary. Broadly, prioritisation depends upon the degree to which the infrastructure is required to deliver development identified in the adopted Local Plan or emerging Cranbrook Plan. This means that each infrastructure project has been categorised as either priority one (critical); priority two (important); or priority three (desirable). In addition, "local priorities" have been identified from town and parish

council's consultation responses, and a review of advanced neighbourhood plans, as being desirable or beneficial to the local community.

1.7 As the IDP represents evidence on the infrastructure requirements to deliver the adopted Local Plan and emerging Cranbrook Plan, it is focussed on the main growth areas in East Devon and does not seek to capture every single potential infrastructure project across the district.

2. Key Findings from the Infrastructure Delivery Plan Review 2017

2.1 The IDP highlights a number of important infrastructure issues relating to the delivery of new housing and economic development in East Devon. In total, around 150 projects are identified in the infrastructure schedule, set out in Appendix One of the IDP. As one would expect, the vast majority of infrastructure requirements are located in Cranbrook and elsewhere in the West End, along with the seven Towns (except Budleigh Salterton where limited growth is proposed).

2.2 Several settlements are relying on infrastructure projects that are critical (priority one) to delivering the Local Plan and emerging Cranbrook Plan – these relate to:

- Education facilities at Axminster, Clyst St Mary, Exmouth, Honiton, Ottery St Mary, and the West End (north of Blackhorse/Redhayes and Pinhoe);
- Energy/utilities/waste improvements at Axminster, Cranbrook, and elsewhere in the West End;
- Environment and Green Infrastructure relating to Exe Estuary and Pebblebed Heaths mitigation (including SANGS at Cranbrook and elsewhere in the West End), and the delivery of Clyst Valley Regional Park;
- Transport improvements at Axminster, Cranbrook, elsewhere in the West End, and Exmouth.

2.3 In addition, a wide range of other projects have been considered as priority two (important) or three (desirable). These infrastructure projects mostly relate to education, healthcare, public services, sport and recreation, and transport. There are also projects relating to environment and green infrastructure; and flood risk and coastal change management.

2.4 Although funding has been identified for many of these projects, this is often not sufficient to cover the total cost. The estimated cost of each infrastructure type, by priority, along with identified funding and funding gap, is summarised in the following table.

Table 1: Overall estimated cost of infrastructure projects

	Infrastructure type	Cost	Funding secured	Funding gap
Priority One	Education	£34,548,272	£20,717,910	£13,830,362
	Energy, Utilities and Waste	£6,000,000	£0	£6,000,000
	Environment and Green Infrastructure	£19,914,510	£10,667,107	£9,247,403

	Transport	£49,775,000	£7,120,000	£42,655,000
Priority Two	Education	£35,890,870	£5,725,355	£30,165,505
	Environment and Green Infrastructure	TBC	TBC	£0
	Flood Risk and Coastal Change Management	£9,000,000	£5,700,000	£3,300,000
	Healthcare	£20,400,000	£0	£20,400,000
	Public Services	£1,779,656	£0	£1,779,656
	Sport and Recreation	£28,855,735	£4,651,190	£24,204,545
	Transport	£9,000,000	£3,700,000	£5,300,000
Priority Three	Communications and Technology	Not specified for East Devon	Not specified for East Devon	£0
	Education	£500,000	£0	£500,000
	Flood Risk and Coastal Change Management	£22,700,000	£19,600,000	£3,100,000
	Healthcare	£98,136,000	£0	£98,136,000
	Public Services	£1,525,000	£0	£1,525,000
	Sport and Recreation	£3,453,423	£547,000	£2,906,423
	Transport	£8,600,000	£700,000	£7,900,000
	TOTAL COSTS/ FUNDING	£350,078,466	£79,128,562	£270,949,894

2.5 As the table shows, the infrastructure costs associated with delivering the adopted Local Plan and the emerging Cranbrook Plan are significant. Out of a total cost of some £350m, around £79.1m has been secured, leaving a total funding gap of some £270.9m. It should be noted that some of the projects have not yet been costed so this is likely to be an underestimate.

2.6 The IDP shows a funding shortfall of over £70 million for priority one projects alone these being the projects that are critical to the delivery of the Local Plan. There are therefore major implications in not being able to close this funding gap including being unable to deliver the required housing and employment spaces required to meet the needs of the district because without the required infrastructure the allocations in the Local Plan could not be delivered in accordance with the Local Plan.

2.7 Therefore, additional funding will need to be sourced, for example from planning obligations, Community Infrastructure Levy (CIL), and grant or loan funding from the district council, county council, national Government, and other bodies such as the LEP. The CIL income that will be available to the council to spend on infrastructure projects is currently estimated to be £30.8m, so it is clear that this range of other

sources of funding will need to be levered in. It may be that town/parish councils will contribute to some of the projects through the “neighbourhood proportion” of CIL that they receive and, as recommended in the CIL Governance Strategic Planning Committee report, the district council will work closely with town and parish councils to develop joint lists of priorities for CIL spend at a local level.

3. Conclusion

- 3.1 The IDP Review 2017 presents the latest evidence on infrastructure issues in East Devon. It has highlighted a significant number of infrastructure projects that are required to deliver the adopted Local Plan and emerging Cranbrook Plan. As discussed, there is currently a funding gap for many projects, particularly with regards to priority one and two transport and education infrastructure. Given this, the council should carefully consider how to spend any available funding (consistent with the CIL Governance SPC report) in order to focus on infrastructure requirements that will deliver the Local Plan and Cranbrook Plan; whilst also seeking to secure other grant and loan funding where possible.
- 3.2 It is also important that the document is used as a basis for discussion with other agencies, infrastructure providers and government to highlight the shortfall in infrastructure funding and put pressure on them to prioritise supporting the delivery of these projects when setting their own budgets and considering funding bids. The impact of not addressing the highlighted funding gap is that the required homes and jobs identified in the Local Plan cannot be provided with significant social and economic issues arising from this.
- 3.3 The IDP should be subject to regular review to ensure it remains up-to-date, so it is suggested that officers embark on another review of the IDP in 2018.



East Devon Infrastructure Delivery Plan

Review

November 2017

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1. Introduction

- 1.1 The delivery of infrastructure alongside housing and economic development is vital in order to create sustainable communities. Physical infrastructure such as transport and utilities connections are often critical to delivering development, without which development may not be able to happen; whilst people should be able to access education, health care, open space and play facilities on a day-to-day basis.
- 1.2 Information on infrastructure provision is a key part of the evidence that is required to inform and support the delivery of the Local Plan. It will also inform other Development Plan Documents (including the emerging Cranbrook Plan) and Supplementary Planning Documents produced by the Council, as well as the Community Infrastructure Levy. The Infrastructure Delivery Plan (IDP) assesses the quality and capacity of infrastructure across East Devon (and beyond with regards to habitats mitigation), in order to show that the development proposed in the Local Plan and the emerging Cranbrook Plan can be delivered, and to identify the infrastructure that is required alongside housing and economic growth.
- 1.3 The Council previously published an IDP in March 2015 which informed the then emerging Local Plan. The IDP should be considered a 'living document', and updated on a regular basis in order to respond to changes relating to the completion of infrastructure projects, opportunities from new development, and as the context pressures change over time.
- 1.4 This report represents the latest evidence on infrastructure requirements to deliver the adopted East Devon Local Plan and emerging Cranbrook Plan. It is focussed on the main growth areas in East Devon and does not seek to capture every single potential infrastructure project across the District.
- 1.5 This IDP has been prepared in consultation with numerous stakeholders, including a range of infrastructure and service providers, other local authorities, and town/parish councils across the District.
- 1.6 The accompanying Infrastructure Schedule (in Appendix One) identifies the required new and enhanced infrastructure projects, along with details on estimated cost, funding issues, and delivery organisation(s). Projects are categorised in order of importance to delivering development (Priority 1, 2 or 3).
- 1.7 The remainder of this report is structured as follows:
 - **Chapter 2** discusses the policy context for infrastructure planning, from a national to local level;
 - **Chapter 3** provides an overview of future housing and economic development proposed in East Devon;
 - **Chapter 4** describes the types of infrastructure that have been considered in preparing this report, defines how projects have been prioritised, and includes an overview of the funding and delivery of infrastructure;

- **Chapters 5 – 13** identify the current infrastructure provision in the main growth areas and settlements in East Devon, along with future infrastructure requirements to deliver housing and economic development.
- **Chapter 14** concludes by highlighting the key infrastructure issues and priorities for East Devon, and contains indicative total costs of infrastructure requirements.
- **Appendix One** is the Infrastructure Schedule, which details each project by Priority 1, 2 and 3.

2. Policy context

National

- 2.1 Although there is not a comprehensive national definition of “infrastructure” in the context of town planning, the Planning Act 2008 states that infrastructure includes:
- a) Roads and other transport facilities,
 - b) Flood defences,
 - c) Schools and other educational facilities,
 - d) Medical facilities,
 - e) Sporting and recreational facilities, and
 - f) Open spaces.¹
- 2.2 In addition to the above, Community Infrastructure Levy can be spent on district heating schemes, police stations, and other community safety facilities.²
- 2.3 The **National Planning Policy Framework (NPPF)** states that Local Plans should plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the Framework.³ A proportionate infrastructure evidence base requires that:
- “Local planning authorities should work with other authorities and providers to:*
- *assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and*
 - *take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”⁴*
- 2.4 Security, community, and cultural infrastructure should also be considered in preparing Local Plans⁵. There should be a reasonable prospect that planned infrastructure is deliverable in a timely fashion, and Local Plans should be deliverable, and not subject to such a scale of obligations an policy burdens that threaten deliverability, including requirements for infrastructure contributions.⁶
- 2.5 The NPPF is supported by **Planning Practice Guidance** which outlines the importance of infrastructure evidence⁷ in preparing the Local Plan, reviewing the Local Plan, and in

¹ Section 216 of the Planning Act 2008, as amended by CIL Regulation 63.

² Planning Practice Guidance Reference ID: 25-071-20140612.

³ National Planning Policy Framework, paragraph 157.

⁴ National Planning Policy Framework, paragraph 162.

⁵ National Planning Policy Framework, paragraph 156.

⁶ National Planning Policy Framework, paragraph 173, 177.

⁷ Planning Practice Guidance Reference ID: 12-018-20140306.

development management decisions. The Guidance advocates early discussion with infrastructure/service providers and the Local Enterprise Partnership to inform infrastructure evidence. Where the deliverability of critical infrastructure is uncertain, then the plan should include possible contingency arrangements and alternative strategies. Whilst the detail concerning infrastructure provision can be set out in an infrastructure delivery programme that can be regularly updated, the key infrastructure requirements on which delivery of the Plan depends should be contained in the Local Plan itself.

- 2.6 A series of **National Policy Statements**⁸ set out how proposals for the development of Nationally Significant Infrastructure Projects (NSIPs) should be considered. Currently, there are no proposals for NSIPs in East Devon.
- 2.7 The **National Infrastructure Delivery Plan 2016-2021** brings together the Government's plans for economic infrastructure with those to support delivery of housing and social infrastructure. It details £483 billion of investment in over 600 infrastructure projects and programmes across the UK. The National Infrastructure Commission provides the Government with impartial, expert advice on major long-term infrastructure challenges.
- 2.8 The **Community Infrastructure Levy** (CIL) is a tool for local authorities to help deliver infrastructure. CIL can be used to fund a wide range of infrastructure, as long as it is needed to support the development of their area, including transport, flood defences, schools, hospitals, other health and social care facilities, district heating schemes, police stations and other community safety facilities.⁹ The levy is intended to focus on the provision of new infrastructure and should not be used to remedy pre-existing deficiencies in infrastructure provision, unless those deficiencies will be made more severe by new development.¹⁰ East Devon District Council began charging CIL on 1 September 2016.

Local

- 2.9 The **East Devon Local Plan 2013 to 2031** was adopted in January 2016. This sets out the scale, type and location of development across the District, and how natural and historic assets will be conserved and enhanced. Local Plan Strategy 50 – Infrastructure Delivery makes clear that infrastructure provision should be phased alongside development, requirements that arise as a direct consequence of development should be met in full, and adverse impacts upon significant amenity or resource should be offset by alternative facilities. The development proposed in the Local Plan is discussed further in Chapter 3.
- 2.10 East Devon has published a **CIL Regulation 123 list** that identifies the infrastructure to be funded in whole or part by CIL. Developer contributions through planning obligations

⁸ Current designated National Policy Statements are: Six Energy NPSs, Ports, Hazardous Waste, Waste Water, National Networks (road and rail).

⁹ Planning Practice Guidance Reference ID: 25-071-20140612.

¹⁰ Ibid.

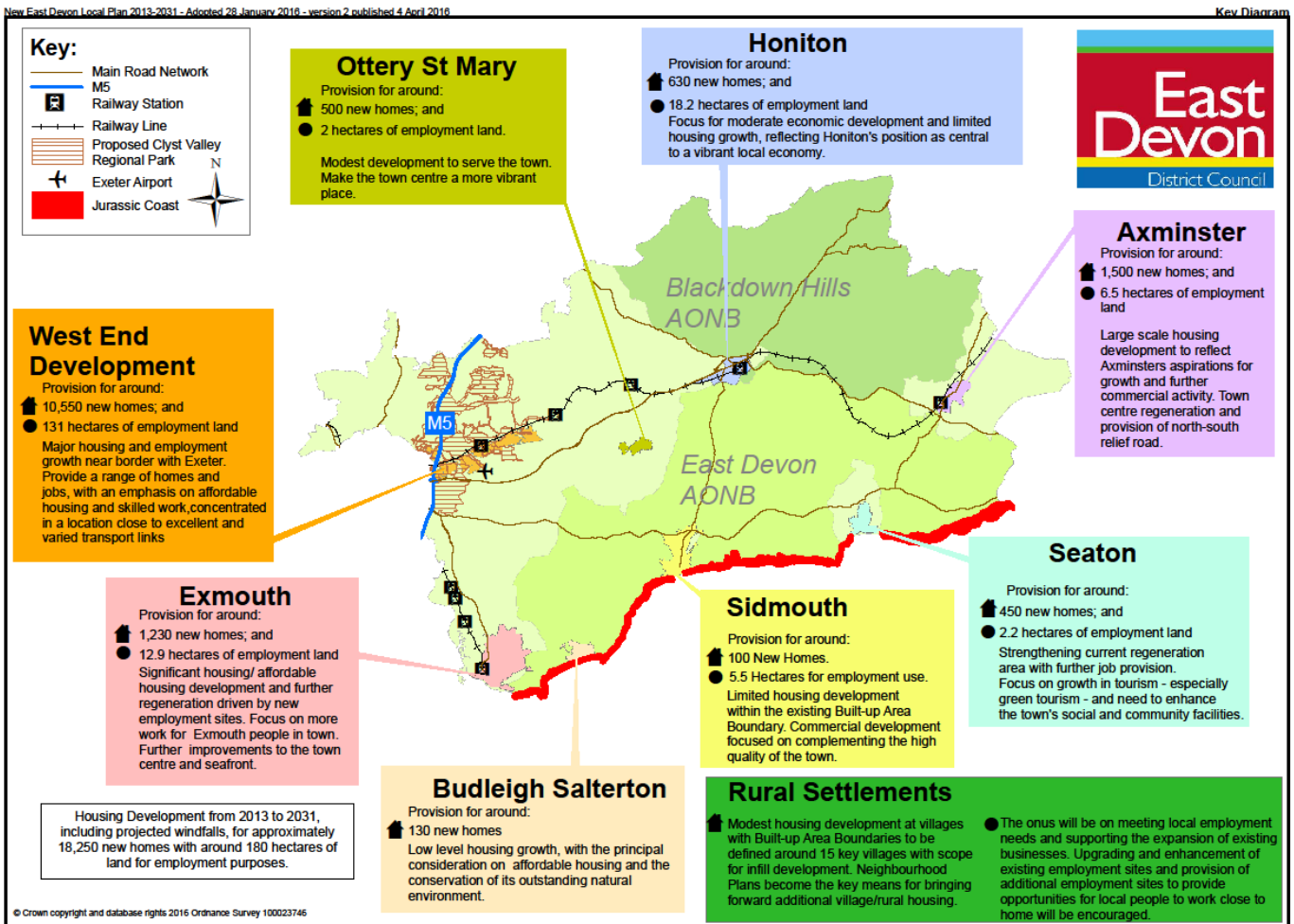
can no longer be sought for these projects. This list can be reviewed and amended where justified and subject to consultation.

- 2.11 East Devon District Council have adopted a **Planning Obligations Supplementary Planning Document** (June 2017) which seeks to provide clarity on the obligations that may be required from new development. The SPD will assist in securing the provision of high quality, sustainable new development supported by appropriate infrastructure provision, adding detail to Local Plan Strategy 50.
- 2.12 The **Cranbrook Plan Development Plan Document** is being prepared to shape and direct the future of this developing new settlement in the “West End” of East Devon. Consultation on an Issues and Options report took place in summer 2016, with ‘preferred options’ consultation from November 2017. The Cranbrook Plan is supported by a range of evidence base studies, which includes this IDP Review – therefore, references to infrastructure required to deliver the Local Plan may equally apply to the Cranbrook Plan.
- 2.13 The Heart of the South West Local Enterprise Partnership has produced a **Strategic Economic Plan 2014-2030**, which is used to negotiate Government funding through Growth Deals. This plan contains three core aims:
- *“Creating the conditions for growth* – improving infrastructure and services to underpin growth including improvements to transport and accessibility, digital infrastructure, sustainable solutions for flood management, skills infrastructure and facilities, and energy infrastructure;
 - *Maximising productivity and employment opportunities* – stimulating jobs and growth across the whole economic through creating more and better employment through enterprise infrastructure, strategic employment sites and unlocking housing growth;
 - *Capitalising on distinctive assets* – utilising distinctive assets to create opportunities for business growth and better jobs.”
- 2.14 The emerging **Greater Exeter Strategic Plan** is a joint plan being prepared by the local authorities of East Devon, Exeter, Mid Devon, Teignbridge and Devon County Council. It is seeking to deliver a joined-up vision for the growth of the area, through the provision of new homes, jobs and infrastructure, up to the year 2040. The first stage of consultation on “issues” took place February – April 2017.

3. Overview of Future Development in East Devon

3.1 The East Devon Local Plan 2013 to 2031 states that a minimum of 17,100 homes and around 150 hectares of employment land should be delivered over the plan period (Strategy 1). It focuses major development in East Devon’s West End, whilst the seven identified Towns will form focal points for development to serve their own needs and the needs of surrounding rural areas. Villages and rural areas will see lower growth levels with development primarily to meet local needs. This strategy for development is shown on the diagram below.

Figure 3.1: Local Plan Key Diagram



3.2 The following table sets out the level of new dwellings that are proposed in Local Plan Strategy 2, along with the latest information for those that have already been built (2013-16) and sites that are expected to be delivered through planning permissions, expected permissions, and allocated sites.

Figure 3.2: East Devon housing requirement as at 30 September 2016 (update to the figures in Local Plan Strategy 2)

Settlement	Projected New Homes Under Local Plan Policy at 30 September 2016				
	Dwellings Built 1 April 2013 to 30 September 2016	Net Commitments With Planning Permission or Under-construction at 30 September 2016 (INCLUDING allocation sites with permission)	Sites that have made significant progress through planning - but at 30 September 2016 did not have planning permission (INCLUDING allocation sites)	Proposed New Local Plan Strategic Allocations (EXCLUDING those that already have planning permission/ADP)	Total
East Devon's West End - Totals	1593	4,552	25	4,370	10,540
Cranbrook	1,249	2,130	25	4,370	7,774
Pinhoe	344	942	0	0	1,286
North of Blackhorse	0	1,480	0	0	1,480
Towns - Totals	1172	2,342	463	1,100	5,077
Axminster	360	456	25	650	1,491
Budleigh Salterton	70	76	0	0	146
Exmouth	281	353	438	350	1,422
Honiton	122	545	0	0	667
Ottery St Mary	147	407	0	0	554
Seaton	92	428	0	0	520
Sidmouth	100	77	0	100	277
Villages and Rural Areas Total	475	715	10	156	1,356
Grand Totals	3240	7,609	498	5,626	16,973

3.3 The majority of employment land is being delivered in the West End, with key sites here including:

- The Intermodal interchange – 43.4 ha
- Skypark Business Park – 35.6 ha
- Science Park – 30.8 ha
- Exeter Airport Business Park – 5 ha

- Cranbrook – 18.4 ha.¹¹
- 3.4 Elsewhere in the District, the two substantial employment land areas proposed in the Local Plan are land west of Hayne Lane, Honiton (15 ha), and north and east of Axminster (6.5 ha).¹²
- 3.5 Given this strategy for growth, the vast majority of infrastructure projects required to deliver development will be located in the West End and the seven Towns. There may also be requirements associated with development at the 15 Villages identified in Local Plan Strategy 27. The delivery of small-scale infrastructure projects to mitigate development in rural areas is outside the scope of the IDP.
- 3.6 The Cranbrook Plan DPD will provide more detail on the delivery of development at this new town.

¹¹ Local Plan Strategy 9, 12, 18 and East Devon Employment Land Review 2014-2015 (year ending 31 March 2015).

¹² Ibid.

4. Infrastructure Types and Delivery

- 4.1 This IDP considers a range of infrastructure types – a brief description of each type is given under the following sub-headings; followed by detail on funding, delivery and prioritisation.

Communications Technology

- 4.2 This incorporates a range of technologies, but this IDP focuses on broadband and mobile phone signals as particularly important issues given the rural nature of much of East Devon. The general principle with telecommunications (as with other utilities) is that services are provided as required on a commercial basis. However, the provision of superfast broadband is not commercially viable for some (rural) parts of the District.

Education

- 4.3 Schools provide a focal point for communities and, as the education authority, Devon County Council (DCC) has various statutory duties in relation to education provision. These include a statutory duty to ensure sufficient school places are available for every child to be able to access a school place between the ages of 4-16 years, sufficient education and training opportunities for young people, and sufficient Early Years and Childcare places for children from birth to 18 years.
- 4.4 DCC has identified the following challenges in relation to education provision in Devon:
- significant residential development planned in the urban areas but some rural depopulation;
 - the need to reduce home to school transport costs;
 - supporting communities through sustainable patterns of provision; and
 - the increasingly autonomous school system.¹³
- 4.5 DCC also note there is considerable uncertainty about the future scale and nature of central Government funding.¹⁴

Energy, Utilities and Waste

- 4.6 This considers water supply, waste water, electricity, and gas; as well as energy relating to the Combined Heat and Power (CHP) facility that generates electricity and heat at Cranbrook. Utilities infrastructure provision is highly regulated and the majority of infrastructure is provided by private-sector companies.
- 4.7 South West Water note that it is difficult to provide feedback on infrastructure costs and need at a 'strategic' level – this is usually done when they are approached by developers so they can analyse the capacity of their systems at that time.

¹³ Devon County Council Education Infrastructure Plan 2016-2033.

¹⁴ Ibid.

Improvements to Sewage Treatment Works will be funded by South West Water through its ongoing business plans/capital works programmes.

- 4.8 Western Power Distribution (responsible for the distribution of electricity) are applying restrictions to the connection of electricity generation in the South West. This is due to the large number of requests for the connection of embedded generation schemes in the last 3-4 years. The impact of this is a delay of 3 – 6 years for the connection of new electricity generation such as from decentralised/renewable energy, subject to the completion (envisaged in 2020) of National Grid's new high voltage route associated with Hinkley Point C.

Environment and Green Infrastructure

- 4.9 Green infrastructure is a term used to describe a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.¹⁵ This infrastructure type includes projects to mitigate the adverse impacts of development upon the Exe Estuary and Pebblebed Heaths European Sites, required under the Habitats Regulations.¹⁶ A proportion (currently 8.6%) of CIL income is ring-fenced for Habitats Regulations Assessment (HRA) infrastructure mitigation; whilst non-infrastructure mitigation will be collected from new dwellings that are built within 10km of the two sites via planning obligations. This IDP considers both infrastructure and non-infrastructure mitigation, as both are required and represent a cost to development. Suitable alternative natural greenspace (SANGS) is part of the mitigation that may be required, particularly for large development sites.

Flood Risk and Coastal Change management

- 4.10 New development should be located outside of areas of medium-high flood risk which should minimise the need for new flood risk infrastructure, but often drainage is an important issue and national policy requires that all major development should incorporate Sustainable Drainage Systems (SuDS), unless demonstrated to be inappropriate.¹⁷
- 4.11 Several organisations are involved in the provision of infrastructure relating to flood risk:
- the Environment Agency provides a strategic overview and has responsibility for 'main' rivers;
 - Devon County Council manage 'local' sources of flooding (surface water, groundwater, ordinary watercourses) and ensure that water which falls on the highway can drain away effectively;

¹⁵ National Planning Policy Framework, Annex 2: Glossary.

¹⁶ The South East Devon European Site Mitigation Strategy (June 2014) identifies a range of mitigation measures. 'Rebasing the SEDESM – the strategic response' (July 2017) updated the costs and funding gap, which includes both "infrastructure" and "non-infrastructure" projects.

¹⁷ Written Statement by Secretary of State for Communities and Local Government, 18 Dec 2014.

- East Devon District Council have powers to undertake flood risk management works to 'ordinary' watercourses; and
- South West Water cover sewerage flooding.

4.12 Beach Management Plans (BMPs) at Exmouth and Sidmouth have indicated schemes that are necessary to maintain the standard of protection against coastal erosion and flooding at these towns. A BMP for Seaton is due to be completed by autumn 2017.

Healthcare

4.13 Healthcare infrastructure constitutes *primary care*, generally the first point of contact in the healthcare system (GP surgery, dentist, pharmacist, optometrists); *secondary care* (specialist support in an emergency, surgery, complex tests); *community services* that support patients in their own homes; and *public health*, which promotes good health and well-being with a view to reducing the need for primary and secondary care. This infrastructure type also includes extra care housing schemes as these are considered to be social care facilities.¹⁸

4.14 As a general principle, the NHS seeks to improve existing infrastructure where required, rather than providing new, as this is usually more cost effective. Small, stand-alone GP practices are no longer sought, with new larger GP practices (minimum of 7-8,000 patients) considered where significant development is planned.¹⁹ The NHS has identified concerns relating to a developer providing a health centre and then charging full market rent for its occupation – the cost of GP buildings is actually fully funded by the NHS, meaning limited benefits from planning obligations in these circumstances as the NHS must then pay the full market rent.

4.15 East Devon has an older population than average, and this ageing nature is forecast to grow considerably. As the population ages there are an increasing number of patients living with multiple long term conditions, and the majority of patient contacts for long term conditions occur in primary care. These factors mean that there is a requirement for increased physical capacity in which to treat the patients.

Public services

4.16 This covers a wide range of community and cultural facilities, including libraries, community halls, youth facilities (including children's centres) and emergency services. These facilities all help to create socially inclusive, high quality, safe places in which to live and work.

Sport and Recreation

4.17 The provision of sport and recreation facilities is important for developing healthy communities, particularly given the healthcare issues identified above. This

¹⁸ Informed by evidence in the 'Extra Care Housing – Refresh of the Commissioning Strategy for Extra Care Housing (2009)', Devon County Council, August 2015.

¹⁹ Below this size, a model of branch surgery that is part of a larger practice is sought.

infrastructure includes sports halls, swimming pools, playing pitches, open space, and play spaces.

Transport

- 4.18 Transport infrastructure covers issues relating to roads, rail, buses, and walking/cycling. New development should provide safe and efficient transport infrastructure, making the fullest possible use of public transport, walking and cycling.
- 4.19 Various organisations are involved in the delivery of transport infrastructure, with Devon County Council having overall responsibility for local transport in the area. Highways England is responsible for the strategic road network, which in East Devon comprises the M5, A30 and A35. Network Rail owns the railway infrastructure, and South Western Railway is the Train Operating Company that runs services through East Devon and oversees the day-to-day management of the train stations. Local bus services are provided on a commercial and non-commercial basis. Devon County Council are responsible for cycle paths, whilst Sustrans, a national sustainable transport charity, works alongside local authorities and communities to encourage travel by foot, bike or public transport.

Funding and Delivery

- 4.20 The funding and delivery of infrastructure is generally through one of the following means:
- *Provided directly by statutory undertakers under their legal obligations and statutory functions* – this includes utilities and telecommunications companies which have investment budgets drawn from charges to customers; Environment Agency funds from Government to protect existing development from flooding;²⁰ and education providers who receive funding to ensure there are sufficient pupil places in all schools, with some capital funding also available.
 - *Funded by developers/landowners as part of mitigating the impacts of a development* – Section 106 planning obligations can be sought, subject to meeting certain tests;²¹ Section 278 agreements can be made between the Highway Authority (Devon County Council) and a developer who agrees to pay for highways works on or adjacent to an adopted highway.
 - *Grant and loan funding* – a number of different grants and loans may be available, from a range of organisations; for example from national Government (e.g. the Housing Infrastructure Fund²²), the Local Enterprise Partnership,²³ and

²⁰ New development is expected to fund its own flood risk mitigation.

²¹ Community Infrastructure Levy Regulation 122; National Planning Policy Framework paragraph 204.

²² This fund was announced in the 2017 Housing White Paper and is worth £2.3bn, available from 2017 for four years.

²³ In East Devon, Local Enterprise Partnership funding has helped deliver Exeter Science Park and is contributing towards delivering the Connecting Devon & Somerset broadband infrastructure.

Local Authority. A funding bid is usually required, and often projects should be 'shovel ready' to be successful.

- *Community Infrastructure Levy* – the Regulation 123 list identifies the infrastructure that can be funded in whole or in part by CIL. Developer contributions through planning obligations can no longer be sought for projects identified on the Regulation 123 list. Current estimates suggest that around £30.8m will be available to the district council to spend on infrastructure projects over the remaining Local Plan period; whilst a proportion (15% or 25%) will also be given to town/parish councils to spend.
- *A combination of the above* – often a variety of different funding sources is required to delivery infrastructure, incorporating several of the types above.

4.21 If delivery of an infrastructure project is uncertain, contingency planning is important to ensure that alternative arrangements can be made. The council will consider the following measures if it is difficult to secure the delivery of infrastructure projects:

- Investigate the potential for alternative funding options;
- Maximise contributions from development (without risking viability);
- Consider investing in infrastructure in some circumstances;
- Hold discussions with relevant organisations and developers/landowners.

4.22 The non-delivery of priority one infrastructure would have a high impact on delivering development as this infrastructure is seen as critical; whilst there would be a lesser impact if priority two or three infrastructure was not delivered. Similarly, the non-delivery of infrastructure that is needed in the first 5 years is more likely to have a high-medium impact on the delivery of growth than projects identified for later when there is more time to gather funding and/or make contingency plans.

Prioritisation

4.23 Whilst EDDC may wish to secure the delivery of all items identified in the Infrastructure Schedule, funding constraints mean that prioritisation is necessary depending upon the degree to which the infrastructure is required to deliver development. Therefore, each infrastructure project has been classed in one of the following categories:

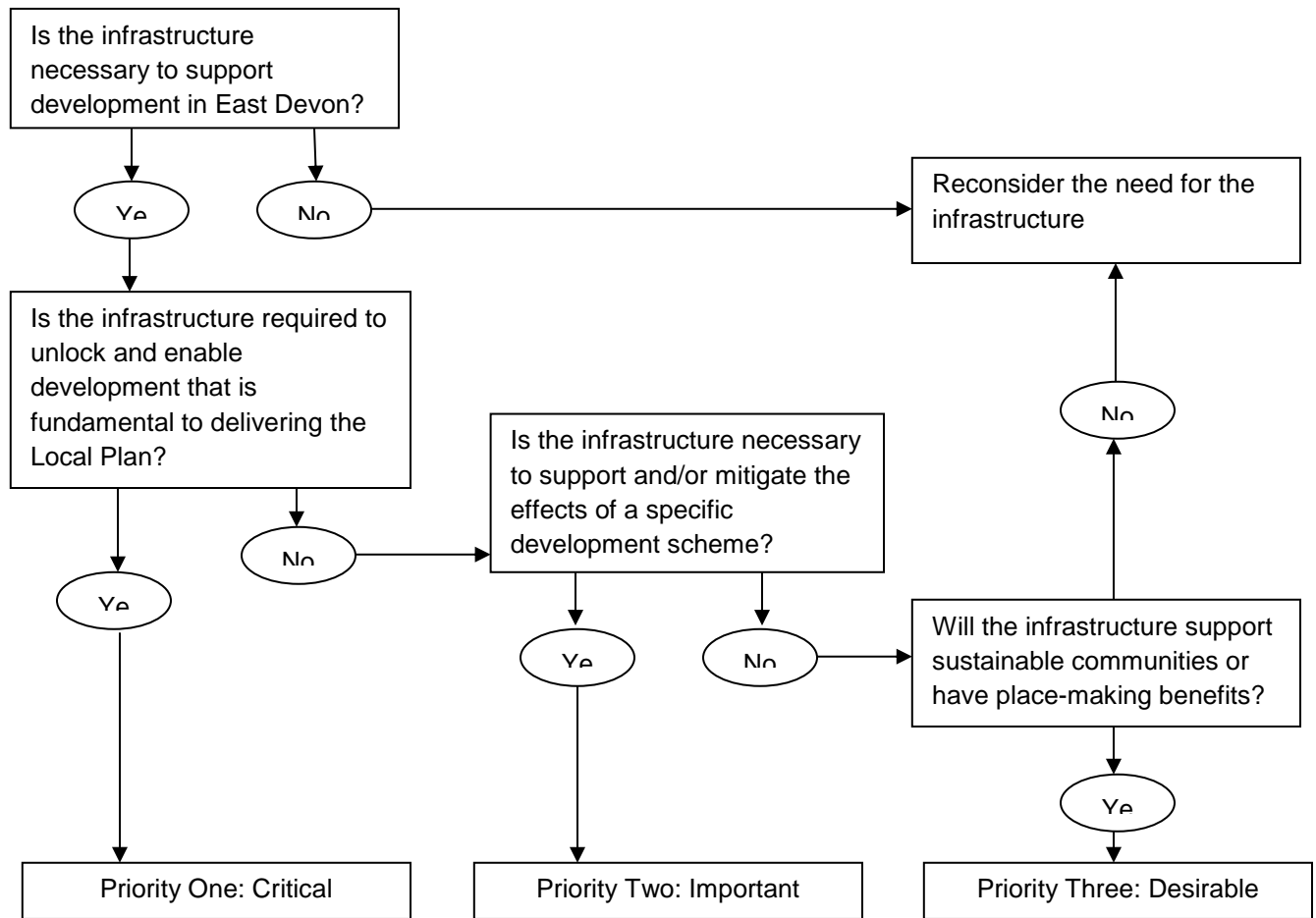
- **Priority One ('critical')**: infrastructure that is fundamental to the delivery of the vision, objectives and policies of the Local Plan. This infrastructure is critical, without which development may not be able to commence and the Local Plan is likely to fail.
- **Priority Two ('important')**: infrastructure that is important to deliver specific development schemes and meet the needs of new residents, but the precise timing is less critical.
- **Priority Three ('desirable')**: infrastructure that would enhance the effectiveness, efficiency, and quality of infrastructure. These projects create a better place to

live and work, and are generally desirable in order to build sustainable communities. Less detail may be available for these projects currently.

4.24 It should be noted that the prioritisation of an infrastructure project may change over time; for example, if its delivery becomes more imperative it may move from priority two to one.

4.25 In addition, “local priorities” have been identified from town and parish council’s consultation responses, as being desirable or beneficial to the local community. This part also includes those infrastructure projects in neighbourhood plans that have been ‘made’. Some of these projects are also reflected within priority one, two or three. The following diagram describes the process for considering the category for an infrastructure project.

Figure 4.1: Infrastructure Prioritisation Process Chart



5. West End

Cranbrook

- 5.1 Cranbrook is a new settlement that has developed rapidly over the last five years and now has around 1,500 new homes and over 3,000 residents. The Local Plan identifies that around 7,770 dwellings in total will be delivered at Cranbrook (3,487 of which have outline planning permission), along with 18.4 hectares of employment land, and a wide range of social/community facilities.
- 5.2 Many infrastructure projects at Cranbrook have either already been delivered, or are required from developer contributions (s.106) for the 3,487 dwellings that currently have approval. The emerging Cranbrook Plan DPD will provide further detail on the future development requirements and their location, particularly in the expansion areas. Alongside this, outline planning applications for 4,370 dwellings to the east, west and south of the extant permissions are currently pending a decision. Given this background, infrastructure projects are associated with either 'approved development' or 'expansion areas' where possible, although often requirements cover both.

Education

- 5.3 St. Martin's Primary School was opened early on in the development of Cranbrook, and has grown from fewer than 40 pupils in September 2012 to now approaching its 420 place capacity. Cranbrook Education campus, an 'all-through' school, providing education for nursery, primary and secondary, opened in September 2015. Two further primary schools are important (*priority two*) in the medium to longer term in the expansion areas: a 420 place primary school, costing £7.2m; and a 630 place primary school, costing £10.8m. Funding is yet to be secured towards these projects. Greater capacity will also be required for secondary education (*priority two*), to expand to around 1,125 places – this would cost £4.3m.
- 5.4 Other education/young person facilities are also needed in Cranbrook, with a children's centre site secured in the s.106 for the approved development (*priority two*). Special Educational Needs in the area should be met through a Special School in Cranbrook, costing £5.4m (*priority two*). Again, no funding has been secured as yet for this project.

Energy, Utilities and Waste

- 5.5 A district heating network, powered by the Combined Heat and Power plant operated by E.ON, is in operation at Cranbrook and the first commercial buildings on the neighbouring Skypark. This system should be expanded to connect with major new development at Cranbrook and the West End, in order to provide low-carbon energy (*priority one*). In order to deliver development proposed in the Cranbrook Plan eastern expansion area, it will be critical (*priority one*) to move some of the overhead electricity cables underground, at a cost of £6m.

Environment and Green Infrastructure

- 5.6 As Cranbrook is within 10km of the Exe Estuary and Pebblebed Heaths European Sites, financial contributions towards HRA non-infrastructure mitigation are sought from all new residential development at the town (*priority one*). As part of the mitigation measures, around 70 hectares of SANGs should be provided for the Cranbrook Expansion Areas (*priority one*).
- 5.7 Clyst Valley Regional Park (*priority one*) is 'landscape-scale' green infrastructure project, some 2,430 hectares in size, which is located in the western edge of East Devon, including links to Cranbrook. The estimated cost of £7m would deliver 36km of new recreational trails to link existing and new communities to the countryside. The project includes a 10km commuting and recreational Clyst Valley Trail which will form the backbone of the Park – £440,000 has been secured from s.106 towards this element of the project. Other than this, no other funding is secured as yet, meaning a current funding gap of £6.56m. Making the Park accessible is just one of several objectives, which include landscape and habitat restoration and creation (trees, hedges, parklands, orchards, and riverine wetlands), heritage conservation, interpretation, educational and visitor facilities.
- 5.8 Finally, the Country Park resource centre (*priority two*) has been agreed in the s.106 for the approved development.

Flood risk and Coastal Change management

- 5.9 The majority of the expansion areas have a low probability of flooding, but there are some areas of medium to high risk. The underlying geology means that infiltrating features may not be suitable for much of the site, so sustainable drainage systems (SuDS) should be integrated with streets, green corridors and open spaces to achieve at least 5% of attenuation on each development parcel, with the remainder discharging to attenuation ponds. These are basic principles at this stage, with no infrastructure project in the schedule.

Healthcare

- 5.10 Cranbrook Medical Practice opened at the Younghayes Community Centre in 2015, and now has a list size of some 1,700 patients. A site for a health and well being hub (0.7 ha) has been secured in the s.106 for the approved development, which will provide a range of primary and secondary care services (*priority two*). This hub building has an initial cost estimate of £10m, but this will be confirmed in due course.
- 5.11 In addition, an extra care housing scheme of 55 flats is important (*priority two*) to meet future demographic needs in the town, costing £10.3m with no funding currently secured.
- 5.12 In 2016, Cranbrook was selected by NHS England as one of ten Healthy New Town demonstrator sites, in order to trial ways of building in improved health and wellbeing outcomes through the design of the built environment, new ways of providing care, and though action within the community.

Public Services

- 5.13 The Younghayes Community Centre provides a range of public services, including the (temporary) Town Council offices, community hall, and (temporary) library. Other public services will be delivered as Cranbrook grows, with a blue light emergency facility (land in s.106 but funding required to construct), youth services facility, Town Council office, public conveniences, a library (building in s.106, but funding required to fit-out), and a place of worship, all to be delivered through s.106 developer contributions from the approved development (*all priority two*). Other public services are required to help deliver a more sustainable community, with town centre car and coach parking, a cemetery, and a multi-functional cultural space (*all priority three*) – the implementation of the car parking strategy is in the agreed s.106, but there is current uncertainty as to the cost and funding of these facilities.

Sport and Recreation

- 5.14 Several play spaces have already been delivered at Cranbrook, including two local equipped areas for play (LEAPs), and a neighbourhood equipped area for play (NEAP). Many other sports and recreation facilities are proposed as Cranbrook develops further, with further play spaces, sports pitches, a sports centre and swimming pool, allotments and open space (*all priority two*). Some of these projects will be delivered through developer contributions in the s.106 for the approved development; whilst others will be required for the expansion areas and therefore currently have a funding gap.

Transport

- 5.15 Cranbrook is located close to the strategic road network, just a few minutes' drive from the A30 and the M5. New junctions on the B3174 (London Road) will be critical (*priority one*) in delivering the expansion areas, to ensure appropriate access to this development.
- 5.16 The town is located on the Exeter – London Waterloo main train line, and Cranbrook train station opened in December 2015. Either a second train station, or improvements to the existing station, are important (*priority two*) to promote sustainable travel in delivering the remaining approved development and the expansion areas. It is likely that only one of these options will be achievable due to cost – a second train station is estimated at £9m, whilst the detail and cost of improving the existing station is yet to be confirmed.
- 5.17 An additional passing loop on the train line would enable increased train frequency that will also mitigate road traffic impacts (*priority one*). This is estimated to cost £15m, with a current funding gap of £11m. Highway re-profiling of the Crannaford Crossing will address safety concerns relating to the grounding of HGVs here (*priority two*).
- 5.18 There is currently a half-hourly bus service from Cranbrook to Exeter city centre in one direction, and Honiton/Axminster in the other. From 2018 onwards, the second phase of this bus service (no. 4) will increase to a 15 minute service linking Cranbrook, Skypark and the Science Park into the city centre, or continued support for half hourly

service (depending upon the rate of development/commercial viability) – of the £1.7m cost, there is a funding gap of £780,000. A strategic cycle route connecting Cranbrook to surrounding areas, including to Exeter City Centre, is proposed in delivering the expansion areas. Both the bus service, and this cycle route, are considered to be critical (*priority one*) as they will provide sustainable travel alternatives to the car, and mitigate capacity issues at the M5, Junction 29. Cranbrook Town Council has identified a desire to construct a bridge over the railway line to access proposed homes near the former Broadclyst station, and improve the Station Road/London Road junction.

Pinhoe urban extension

- 5.19 The Local Plan allocates a mixed-use scheme comprising 800 homes (although permission now exists for 1,300 homes, 300 of which have been built), 3 hectares of employment land, and social/community facilities at Pinhoe. Given its location, it is in effect an urban extension to Exeter, so there are cross-boundary issues relating to infrastructure requirements.
- 5.20 A new 420 place primary school (*priority one*), including nursery, is critical to delivering this development and a planning application is currently pending a decision. This will cost £7.1m and should be fully funded through section 106 contributions. Secondary education provision is also sought for developments in the West End, excluding Cranbrook (*priority one*).
- 5.21 A district heating network, powered by an energy centre located on the Monkerton development, Exeter, will serve development at Pinhoe, along with the Science Park and North of Blackhorse/Redhayes (*priority one*).
- 5.22 Suitable alternative natural greenspace (SANGs) forms part of the Old Park Farm development (north of B3181), in the form of an on-site linear park and off-site restoration works to Poltimore Park (*priority one*).
- 5.23 Improvements along Langaton Lane (section east of M5 bridge to Tithebarn Lane) for all travel modes (walking/cycling/vehicles) are critical to delivering development in this area (*priority one*). This project will cost around £1m, of which £700,000 has been secured through section 106 contributions, and will link with the North of Blackhorse/Redhayes site discussed below. Enhancements to bus provision to encourage sustainable travel are important (*priority two*) in delivering this site, specifically through the extension of the number 1 service. These enhancements will cost £1.55m, fully funded through section 106 contributions. Improved access to rail connections at Pinhoe are also sought (*priority two*).

North of Blackhorse/Redhayes

- 5.24 This site is allocated for 1,500 homes, social/community facilities, and employment land; and now has planning permission. A new 420 place primary school is critical (*priority one*), but there is currently a £2.5m funding gap from the total cost of £7.1m. The additional capacity referenced above for secondary education from developments in the West End, excluding Cranbrook, also applies to this site (*priority one*).

- 5.25 As stated above, the Monkerton district heating network will provide heat for future occupiers of this development (*priority one*). An on-site Country Park will deliver the required SANGS for this development (*priority one*).
- 5.26 The section of the Tithebarn Link Road from Cumberland Way to Tithebarn Bridge is now complete, and the remaining section to Blackhorse is under construction. A separate foot/cycle bridge over the M5 (Tithebarn Lane Bridge) is seen as important (*priority two*) to delivering this site – this scheme will cost £1.4m, and is fully funded. Improvements to bus links to Exeter city centre, costing £1m, are also important (*priority two*) but no funding is committed as yet.

Skypark / Exeter Science Park / Exeter International Airport / Exeter Airport Business Park

- 5.27 These four employment sites are all integral to delivering economic growth at the West End. Significant improvements to transport infrastructure in the area have been completed over recent years, in order to ensure the proposed employment development can be delivered.
- 5.28 **Skypark** is a major high quality business park, some 40 hectares in size. It has outline planning permission and several buildings have been delivered and are occupied, although it will be some years before the site is complete. All buildings are committed to connect to E.ON's district heating network.²⁴ The replacement of Waterslade Park football pitch is proposed on the eastern edge of Skypark (*priority two*). There is a half-hourly bus service to Exeter city centre that can be accessed from stops nearby at Cranbrook or Clyst Honiton – the second phase of this service is referenced under Cranbrook above (*priority one*), but further improvements are sought to provide better links with the Airport and its Business Park, and the Science Park (*priority two*).
- 5.29 **Exeter Science Park** is a developing premier research and technology employment centre. As with Skypark, outline permission has been granted, and is partially occupied with further development underway following extensive transport infrastructure improvements in the vicinity. The Monkerton energy centre will provide a district heating network for this development (*priority one*). Other proposed transport improvements in the West End already referenced will also benefit the delivery of the Science Park.
- 5.30 **Exeter International Airport**, along with the adjacent **Exeter Airport Business Park**, are the other key employment sites in the West End. The Local Plan supports the growth of the airport, and allocates five hectares of employment land at the business park. Although there is a bus service to Exeter city centre, links to developments nearby (e.g. Cranbrook, Skypark, Science Park) are lacking, and a service to enable this is important (*priority two*) in delivering further growth in this location. This service is estimated to cost £1m, with no funding currently secured/identified. Widening improvements to Exeter Airport Business Park Link Road (Long Lane) to enable safer access and improved forward visibility are critical (*priority one*) – some widening works

²⁴ Heat Network Strategies for the West End of East Devon, December 2016.

along this road are proposed as part of the France-Alderney-Britain planning application for an electrical convertor station that is currently pending a decision.

6. Axminster

Background

- 6.1 Axminster is home to 5,800 people²⁵ and, as one of the seven 'Towns' identified in the Local Plan, will see significant housing and employment growth over the next 15 years or so. Indeed, Axminster has more housing growth over the Local Plan period than any of the seven Towns, with 1,500 homes alongside 9 hectares of employment land.

Key Infrastructure issues

Education

- 6.2 There are two primary schools – Axminster Community Primary with a current capacity of 238 pupils, and St Mary's Catholic Primary School with 140 pupil capacity. Although the number of children attending these schools is currently less than capacity, projected future growth will mean that the both schools will be over capacity in 2019/20. Given this pressing need, Devon County Council have acquired land to expand a primary school, identified as *priority one* in the infrastructure schedule, although there is still a funding gap of around £3.5m. The mixed-use Local Plan allocation to the north and east of the town makes provision for a 210 pupil primary school.
- 6.3 Axe Vale Community College provides secondary education for Axminster and the surrounding area. The current number of pupils is currently less than the capacity of 905, but future growth means that there is a project for a secondary education facility (*priority one*), currently with a £1.9m funding gap.

Energy, Utilities and Waste

- 6.4 Improvements to the sewerage drainage system are required to mitigate the environmental impact of development, particularly upon the River Axe Special Area of Conservation that runs along the western edge of the town. This is essential to delivering development (*priority one*), and will be funded by developers and South West Water.

Healthcare

- 6.5 The NHS has recently funded a substantial extension at Axminster Medical Practice, addressing previous issues of this primary care facility being under-sized. The list size at this practice is currently 11,700 patients; further increases in population would require further physical capacity. With regards to secondary care, Axminster Hospital provides a range of services for the town and wider rural hinterland that enable people to be cared for closer to home and in their own community, although it does not contain medical inpatient beds. The ageing nature of the population means that extra care housing will be required in Axminster in the period up to 2033, with a project for a 65 unit scheme costing £12.2m (*priority three*).

²⁵ All usual residents, Axminster Built-up Area, Census 2011.

Public Services

- 6.6 Public services in the town include a library, youth centre and Town Hall. Some relatively small-scale improvements to the library in order to respond to the growth of Axminster are considered a desirable (*priority three*).

Sport and Recreation

- 6.7 Axminster has a good range of sports and recreation facilities, including outdoor sports pitches, a swimming pool, and sports hall. Indeed, the only full size 3G pitch available for public hire in East Devon is located at Axminster Leisure Centre. However, there are some parking and access issues arising from the leisure centre sharing its facilities with Axe Valley Community College – improvements to address these issues are desirable (*priority three*), and should be considered alongside improvements to the swimming pool (*priority three*). A new fitness gym is included (*priority three*) that would also address these issues, although there is currently no funding committed to this project. Additional football pitches at Cloakham Lawn, Axminster Town Football Clubs' new site, and the north and east mixed-use allocation are all important (*priority two*), reflecting the Playing Pitch Strategy – the total cost of these projects is £273,000, with no funding secured as yet.

Transport

- 6.8 Axminster has good transport links, with the A358 travelling through the town providing access to the north towards Chard and south to Seaton and the south coast. The A35 (part of the strategic road network) gives east-west links. The town centre suffers from traffic congestion at peak times. Axminster has a train station, providing an hourly service in each direction along the Exeter – London Waterloo line.
- 6.9 The most significant transport infrastructure project is the north-south relief road (*priority one*), to be delivered as part of the large north and east Local Plan allocation. This project is costly at £16.7m, with funding yet to be confirmed. Several other transport projects are also proposed, including improved footpaths, cycle paths, and bus services to link Cloakham Lawns and the north/east allocation with the rest of the town (*priority two*). In addition, projects to improve the Stony Lane junction, town centre regeneration, and Weycroft bridge improvements are seen as desirable (*priority three*). Additional car/cycle parking to serve the train station is a local priority.

7. Budleigh Salterton

Background

- 7.1 Budleigh Salterton is a small coastal settlement with a population of 5,200 people.²⁶ Although it is identified as a 'Town' in the Local Plan, there are several important environmental constraints that limit its growth to around 140 dwellings. No future infrastructure projects have been identified for Budleigh Salterton currently, reflecting the limited proposed development, so the following text highlights some of the existing infrastructure issues in the town.

Education

- 7.2 St Peter's Church of England (CofE) is the only primary school in Budleigh Salterton, located in the north west of the town. The recent expansion of this school to 280 spaces has ensured sufficient capacity, but there is limited potential to expand further if required in the future. The secondary feeder school for St Peter's is Exmouth Community College, which does have capacity issues (see Exmouth chapter).

Environment and Green Infrastructure

- 7.3 As Budleigh Salterton is within 10km of the Exe Estuary and Pebblebed Heaths European Sites, financial contributions towards HRA non-infrastructure mitigation are sought from all new residential development at the town (*priority one*).

Healthcare

- 7.4 Budleigh Salterton Surgery currently has around 8,000 patients enrolled, and the building is slightly undersized for this level. Budleigh Hospital is being transformed into a modern health and well-being hub that will provide a wide range of services and activities for the local community to improve the quality of health and wellbeing in the area.

Public Services

- 7.5 Other public services in the town include a library, fire station, and public hall. With regards to sports and recreation, there are outdoor sports pitches, play areas, and recreation walking routes, but the town lacks indoor sports facilities.

Transport

- 7.6 Transport links to Budleigh Salterton are relatively poor, only being served by 'B' roads – the nearest 'A' roads being some five miles away at Exmouth and Newton Poppleford. There are regular bus services to the nearby Towns of Exmouth (half hourly) and Sidmouth (hourly).

²⁶ All usual residents, Budleigh Salterton Built-up Area, Census 2011.

8. Exmouth

Background

- 8.1 Exmouth is the largest settlement in East Devon, home to around 34,500 people.²⁷ Significant development is planned at this coastal town, with over 1,200 homes and 12.9 hectares of employment land proposed in the Local Plan.

Key Infrastructure issues

Education

- 8.2 There are eight primary schools in Exmouth, the largest of which is Withycombe Raleigh CofE Primary School with a capacity of 593 pupils. The planned growth of the town means that additional primary school capacity will be required later in the plan period. An additional 210 places are proposed (*priority two*) through either a new school at the Goodmores Farm Local Plan allocation, or the expansion of Brixington Community Nursery and Primary School to 630 places. A funding gap of nearly £2.9m currently exists for this project.
- 8.3 With a capacity of just over 2,400 pupils, Exmouth Community College is one of the largest secondary schools in the country. The planned growth of over 1,300 homes within the school catchment area means that the College will be over capacity. The expansion plans are seen as critical (*priority one*) and will cost £2.7m, of which only £750,000 is currently secured.

Environment and Green Infrastructure

- 8.4 As Exmouth is within 10km of the Exe Estuary and Pebblebed Heaths European Sites, financial contributions towards Habitats Regulations Assessment (HRA) non-infrastructure mitigation are sought from all new residential development at the town (*priority one*).

Flood Risk and Coastal Change Management

- 8.5 Exmouth is an important visitor destination, with its 3km long sandy beach a major draw for tourists. A Beach Management Scheme is anticipated to consist of beach recharge to maintain the standard of protection against flooding and coastal erosion. This will promote investment in the town, particularly the town centre, consistent with Local Plan Strategy 22 (*priority three*, cost £3.1m).
- 8.6 Funding has been secured to deliver a flood defence at the Estuarieside, with detailed designs underway (*priority three*, cost £19.6m). There is potential to add the Estuarieside Linear Park as part of this, although additional funding would be required.

²⁷ All usual residents, Exmouth Built-up Area, Census 2011.

Healthcare

- 8.7 There are five GP practices in Exmouth, with a total of 37,900 patients. Some of these premises are undersized for the current population and would benefit from being extended if the opportunity arose. Exmouth Hospital provides for secondary care in the town and wider local area that enable people to be cared for closer to home and in their own community, including a minor injuries unit and medical inpatient beds.
- 8.8 Due to future demographic changes, a large number of extra care housing units (189) are forecast to be required in Exmouth by 2033. It is likely that this provision will be across two or more sites, costing around £35.5m (*priority three*).

Public Services

- 8.9 As the largest settlement in the district, Exmouth has a wide range of public services. Many different shows, theatre productions and events take place at Exmouth Pavilion. There is an aspiration to replace the small and out-dated Exmouth Library, with a larger, modern facility in the town centre (cost £1.5m, *priority three*).

Sport and Recreation

- 8.10 Exmouth has a large range of sport and recreation facilities, with a swimming pool, indoor tennis centre, golf pitch and putt, and numerous other sports pitches and play spaces. Further sports playing pitches will be required to accommodate future development, including rugby and football pitches, a 3G artificial grass pitch, and improvements to existing playing fields at St Johns Road and Knapp Cross (*priority two*) – there is currently a large funding gap of nearly £3.4m for these projects. Improvements at the swimming pool through the provision of a ‘changing village’ for modern use have recently been completed.
- 8.11 In addition, East Devon District Council is seeking to create a modern, exciting and attractive new leisure area on the seafront. Known as the Queen’s Drive leisure area, it will include a water sports centre, mixed leisure use (*priority three*), and will involve moving the existing road and car park.

Transport

- 8.12 Transport links are constrained by the location of the town which, in effect, is on a promontory. Exmouth is served by a single ‘A’ road in the form of the A376 which travels north out of the town towards Exeter and the M5 – as the one main road route, traffic flow is perceived as heavy along here. However, the promontory location also means that the town does not suffer from heavy through traffic, and the overall level of traffic flow is low by comparison with other market towns of comparable size.²⁸ The “Avocet line” connects Exmouth by rail to Exeter, with a number of local stops in between. This is a busy line, popular with local people for commuting and shopping, and visitors on holiday and day trips.

²⁸ Exmouth Town Centre and Seafront Masterplan, December 2011.

- 8.13 A series of improvements to transport infrastructure are identified to deliver additional development. The completion of Dinan Way to the A376 (*priority one*) will help remove traffic from residential streets and ease access to the south eastern parts of town. This will cost £10m with a current funding gap of £8.5m.
- 8.14 Non-car transport measures will support sustainable communities in Exmouth, including the provision of walking/cycle links between development sites and key services and facilities (schools, town centre, employment sites, Exe Estuary Trail, Valley Parks); continuing support for bus services; and improvements to Avocet Line train stations such as lengthening platforms and improving facilities (*all priority three*).
- 8.15 Finally, some other transport infrastructure improvements are sought to deliver the Exmouth Masterplan, including at Foxholes Hub, Chapel Hill and along the Promenade (*all priority three*).

9. Honiton

Background

- 9.1 Honiton is the third largest settlement in East Devon, home to 11,500 people.²⁹ It is centrally located in the district, providing jobs, services and facilities for a wider rural hinterland. A moderate level of growth is planned at the Town, with some 630 dwellings and 18.2 hectares of employment land proposed in the Local Plan.

Key Infrastructure issues

Education

- 9.2 Honiton has two primary schools of similar size: Honiton Primary School (capacity: 420 pupils) and Littleton Primary Academy (capacity: 413 pupils); and one secondary school (Honiton Community College, capacity: 1058 pupils). Both primary schools are nearing capacity, and additional facilities are critical to address this issue (*priority one*). The cost of this is estimated to be £2.8m, but there is a funding gap of £850,000. Honiton Community College has capacity to accommodate additional pupils.

Healthcare

- 9.3 The NHS has recently funded a substantial expansion of the GP surgery, which ensures sufficient capacity for the 16,800 patients currently on the practice list. Honiton Hospital provides a range of secondary care services for the town and the surrounding rural area that enable people to be cared for closer to home and in their own community, including a minor injuries unit and maternity unit. A need has been identified for 72 units of extra care housing up to the year 2033 (*priority three*).

Public Services

- 9.4 There are a range of public services in the town, including a library, community centre (The Beehive), youth centre, and emergency services facilities (police, fire, and ambulance station).

Sport and Recreation

- 9.5 Honiton has several sports and recreation facilities, with a sports centre, swimming pool, sports pitches (football, cricket, rugby), outdoor tennis courts, and children's play areas. A range of playing pitch improvements are seen as important in delivering new development, including a new sand-based artificial grass pitch, new rugby pitches, additional youth football pitches, and improving the facilities and capacity on existing pitches (*all priority two*). There is currently a lack of funding for these projects. Refurbishment of the swimming pool changing rooms is sought to cope with increasing demand and to provide a modern service (priority three) – East Devon District Councils'

²⁹ All usual residents, Honiton Built-up Area, Census 2011.

capital programme includes £79,750 for this project, which is due to provide half of the total cost.

Transport

- 9.6 Honiton has excellent transport links, the best of all Towns in East Devon. A train station is located close to the town centre, providing services along the main Exeter – London Waterloo line. Two roads that form part of the strategic road network meet at Honiton: the A30 and the A35. The A30 provides a (dual carriageway) link westwards to Exeter (and the M5), and east towards the A303. The A35 travels to Axminster and to areas beyond along the south coast. There are regular (half hourly) bus links to Exeter city centre and other surrounding towns and villages.
- 9.7 Much needed improvements to Turks Head junction have now been completed. The widening and enhancement of Hayne Lane is important to deliver the large permitted housing site to the west of the town (*priority two*), to be delivered by the developer. Public transport enhancements should serve development in this part of town, also linking with the Local Plan employment allocations, at a cost of £1m (*priority two*). Improvements to walking and cycling networks to create links between existing employment, and proposed housing sites within the town and to the west, will mitigate the effects of these developments (*priority two*).

10. Ottery St Mary

Background

- 10.1 Ottery St Mary is a small, attractive town of some 4,900 people³⁰ located near to the centre of East Devon. Moderate growth of around 500 dwellings (all of which have either been built or now have planning permission) is proposed through the Local Plan. In addition, three parcels of land totalling 2.2 hectares are allocated for employment uses at Fennemore Industrial Estate. The Local Plan aspires for a more vibrant town, and this housing and employment growth should support this aim.

Key Infrastructure issues

Education

- 10.2 Ottery St Mary has one primary school (capacity of 417 pupils), located in the east of the town, and one secondary school (King's, capacity of 1,150 pupils), in the west. The Local Plan includes an allocation of land to the west of King's School for community and education uses, which Devon County Council consider should be for primary school provision.
- 10.3 The primary school is close to capacity, and a critical (*priority one*) project has been identified for additional primary provision (210 places) in the short term. Although some section 106 contributions are expected for this project, there is currently a funding gap of £2m.
- 10.4 The King's School is very near to capacity and is popular, meaning that a project for the improvement of secondary education facilities (*priority two*) has been identified. £1.3m has been secured from developer contributions towards this. King's has indicated that it has no land on which to expand and no finances to buy land or create the significant build to take more students.

Environment and Green Infrastructure

- 10.5 As Ottery St Mary is within 10km of the Pebblebed Heaths European Site, financial contributions towards Habitats Regulations Assessment non-infrastructure mitigation are sought from all new residential development at the town (*priority one*).

Healthcare

- 10.6 The Coleridge Medical Centre has just under 16,000 patients on its list, and the building is considered to be slightly undersized for the present number of patients. Further capacity would be required for additional population. Ottery St Mary Hospital provides a range of secondary care services for the town and the surrounding rural area that enable people to be cared for closer to home and in their own community. A need has

³⁰ All usual residents, Ottery St Mary Built-up Area, Census 2011.

been identified for 55 units of extra care housing up to the year 2033, costing £10.3m (*priority three*).

Public Services

- 10.7 Ottery St Mary has a library, town council offices, and fire station. The library is considered to be substandard, with difficult access for the disabled, although there are no current plans to replace it.³¹

Sport and Recreation

- 10.8 Sports and recreation facilities include the Leisure Centre adjacent to The King's School, where there is a sports hall, gym, artificial sports pitch, and outdoor tennis courts. A new fitness gym and studios are sought to address demand and access issues at King's School plus early Cranbrook growth, at a cost of £750,000 with no funding currently committed (*priority three*). Improvements to access and additional car parking capacity are desired at the Leisure Centre (*priority three*). Several football pitches are located on the north east edge of the town, and additional youth football pitches are proposed at Winter's Lane recreation ground (*priority two*).

Transport

- 10.9 Ottery is located some 3km south of the strategic road network (A30). Although roads travelling west towards Exeter are good, road links from elsewhere are relatively poor. Narrow roads and one way streets mean that there are pinch points which affect traffic flow across parts of the town. Ottery does not have a train station, but there are regular (half hourly) buses to Exeter city centre, although there is no service on Sundays or Bank Holidays.
- 10.10 Improvements to walking/cycling networks in order to create a link between the western development sites and town centre, employment areas (including Otter Nurseries) and schools, are desirable to support sustainable communities (*priority three*). In addition, the proposed Sidmouth to Feniton cycle route passes through Ottery St Mary (costing £1.4m, *priority three*).
- 10.11 Consultation with the local community has identified infrastructure issues relating to: the enhancement of the riverside area; the need for an additional car park for 80-100 vehicles; improving the street scene; re-siting the town centre bus stops and provision of a bus station with shelter/seating; and enhancing the town square and providing safer pedestrian access.

³¹ East Devon Local Plan 2013-2031, paragraph 12.3.

11. Seaton

Background

11.1 Seaton is a modest sized coastal town, home to around 8,400 people.³² Around 450 new homes are planned in the town, all of which have either been built or have planning permission. The Local Plan identifies 2.2 hectares of employment land east of Harepath Road adjacent to Fosseyway Industrial estate, on the northern edge of Seaton, as part of a mixed-use allocation employment and recreation uses. This housing and economic development should support the continued regeneration of the town.

Key Infrastructure issues

Education

11.2 Seaton Primary School has a capacity of just over 380 pupils, and the current number on the roll is approaching this capacity – as a result, expansion of the school through extending existing buildings may be needed (*priority two*). This is projected to cost £1.4m, with a current funding gap of £841,000.

11.3 Seaton does not have a secondary school, so the secondary feeder school is Axe Valley Community College in Axminster (see Axminster section).

Healthcare

11.4 There are two GP surgeries in Seaton: Townsend House Medical Centre (6,100 patients), and Seaton and Colyton Medical Practice (7,800 patients). Whilst Townsend House has sufficient space, Seaton and Colyton is in an undersized building and options for expansion are currently being considered – £93,500 has been secured from a section 106 agreement for this priority two project.

11.5 Seaton Hospital provides a range of secondary care services for the town and the surrounding rural area that enable people to be cared for closer to home and in their own community. Future demographic requirements indicate a need for 58 extra care beds (*priority three*) in Seaton up to the year 2033, at an estimated cost of £10.9m.

Public Services

11.6 Public services that are available in Seaton include a library and a community hall. There also several cultural facilities in Seaton associated with its role as tourist attraction, such as Seaton Jurassic and the Tramway.

Sport and Recreation

11.7 The Axe Valley wetlands provide a large area of recreation along the eastern edge of the town, but Seaton has fewer sports facilities compared to some of the other towns. It lacks a sports hall, and the swimming pool which is located at the primary school only

³² All usual residents, Seaton Built-up Area, Census 2011. Nb. Seaton BUA includes the village of Beer.

has limited public opening hours.³³ Nevertheless, a new fitness gym has opened in the town centre, and there are several outdoor playing pitches (football, tennis, cricket). The relocation of Seaton Town FC to the Harepath Road allocation site will include adult and youth pitches, a covered stand, clubhouse and car parking (*priority two*). The total cost is £910,000, with a current funding gap of £710,000.

- 11.8 Enhancements to the swimming pool parking, signage, changing, security, and landscaping are seen as desirable (*priority three*) – this project is estimated to cost £125,000, with no funding secured as yet.

Transport

- 11.9 The A3052 skirts the northern edge of the town, linking Seaton with other parts of the south coast. Seaton is located some distance from the strategic road network, being 6 miles south of the A35 and 12-13 miles from the A30 dual carriageway. There is no train station, but buses serve other surrounding towns and Exeter city centre. No transport related infrastructure improvements have been identified in order to deliver development at Seaton through this IDP.

³³ The swimming pool is open to the public during school holidays and weekends from April to September.

12. Sidmouth

Background

12.1 Sidmouth is nationally renowned as a Regency seaside town and is home to 12,500 people³⁴ although this is boosted by tourist numbers throughout the year, particularly during the summer. Limited housing growth is proposed through the Local Plan, totalling around 270 homes, of which 100 remain to be delivered on three brownfield site allocations within the town. Up to 5 hectares of employment land is allocated north of Sidford, with a further 0.5 hectares of employment land at Alexandria Trading Estate. The Port Royal mixed use allocation near the seafront includes housing, community, commercial, recreation and other uses.

Key Infrastructure issues

Education

12.2 Sidmouth Primary School (located across three sites) has a capacity of just over 620 pupils. Additional capacity is important (*priority two*) alongside the delivery of new housing growth, and will be delivered through the extension of existing buildings at a total cost of £500,000, with a current funding gap of £343,000.

12.3 Sidmouth College provides for secondary education needs at the town (capacity of nearly 960 pupils). Further capacity is to be provided through an extension to existing buildings (*priority two*). This project, costing £573,000, is fully funded from section 106 agreements.

Environment and Green Infrastructure

12.4 As Sidmouth is within 10km of the Pebblebed Heaths European Site, financial contributions towards Habitats Regulations Assessment non-infrastructure mitigation are sought from all new residential development at the town (*priority one*). The Byes is a particularly valued green infrastructure link in the town.

Flood Risk and Coastal Change Management

12.5 A Beach Management Scheme seeks to maintain the standard of protection against flooding and coastal erosion at Sidmouth. This scheme is estimated to cost £9m (with a funding gap of £3.3m) and is integral to the economic growth of the town, promoting business opportunities in the town centre consistent with the Local Plan. It will also help protect homes, including the 30 dwellings allocated at Port Royal³⁵ and is therefore considered to be *priority two*.

³⁴ All usual residents, Sidmouth Built-up Area, Census 2011.

³⁵ Plans for the development of this site are currently being worked up, which may result in additional infrastructure requirements in the future to help deliver the scheme.

Healthcare

- 12.6 GP services in Sidmouth are provided by the Sid Valley Practice, which has around 14,500 patients. The practice operates from two sites: Blackmore Health Centre in the town centre, and The Beacon Medical Centre located on the northern edge of Sidmouth. The Beacon Medical Centre was redeveloped a few years ago and is a modern facility that provides significant capacity. The Blackmore Health Centre site in the centre of town has functionality issues and further monies are required to modernise and improve the facility so that it can provide effective healthcare services.
- 12.7 Sidmouth Hospital provides a range of secondary care services for the town and the surrounding rural area that enable people to be cared for closer to home and in their own community, including medical inpatient beds, x-ray, and surgery. Future demographic requirements indicate a need for 83 extra care homes (*priority three*) up to the year 2033, at an estimated cost of £15.6m.

Public Services

- 12.8 There are a wide range of public services in Sidmouth, with a library, museum, community centre, youth centre, and emergency services facilities.

Sport and Recreation

- 12.9 Similarly, Sidmouth has a variety of sport and recreation facilities. The swimming pool, and outdoor sports pitches for cricket, rugby, and tennis are located near to the town centre. A sports hall with a gym is located at Sidmouth College, with football pitches nearby.
- 12.10 Additional youth football pitches are important to support new development, along with other improvements to facilities such as installation of floodlights at Sidmouth College artificial pitch, changing facilities at Byes Lane, and a floodlit rugby 3G training pad (*all priority two*). In order to address capacity, parking and access issues relating to the gym at Sidmouth College, a new fitness gym and studios is seen as desirable (*priority three*) – this project would cost around £750,000. Improved facilities, parking and access at the existing leisure centre are also sought (*priority three*). There is currently a lack of funding to deliver these sports and recreation projects.

Transport

- 12.11 Sidmouth is located adjacent to the A3052 which provides road links west to Exeter, and east along the coast towards Seaton and Lyme Regis. The A375 travels north to Honiton, where there is access to the strategic road network (A30 and A35). Sidmouth does not have a train station, but there are regular (half hourly) bus services to Exeter city centre, and an hourly service to Honiton (which provides a stop the train station there).
- 12.12 The provision of a new access into the Alexandria Trading Estate from the Bulverton Road (B3176) would provide a safer access and help relieve nearby residential roads from industrial traffic (*priority three*) – this is estimated to cost £1m. There is an existing

access off Bulverton Road, but if a new access is necessary to deliver the small employment allocations at the estate, then it is likely that this scheme would be considered as priority two.

- 12.13 Two cycle routes that would link to Sidmouth are seen as desirable (*priority three*): Sidmouth to Feniton, loosely following the old railway line, costing £1.4m; and Sidmouth to Sidbury, cost to be confirmed. Both projects require funding, although the Sidford employment allocation should contribute to the Sidmouth to Sidbury cycle path. Also, a 'park and change' facility close to the A3052 that could reduce the number of cars travelling into the town centre is seen as desirable (*priority three*).
- 12.14 In addition to the projects already highlighted, better management of road space in the town, updated/renewed youth facilities, and Alma Bridge have all been identified as local priorities in consultation with the Town Council and Neighbourhood Plan steering group. Devon County Council has indicated that Alma Bridge should be replaced in 2018, subject to securing appropriate consents.

13. Villages and Rural Areas

Background

- 13.1 Much of East Devon comprises villages and rural areas. The infrastructure serving these parts of the district is often poor in comparison with the Towns; and there is often less opportunity to access communications technology, education, utilities, healthcare facilities, and other public services.
- 13.2 The Local Plan identifies 15 settlements that will have Built-up Area Boundaries defined in the Villages Plan, which are considered appropriate for development subject to site-specific issues. Given the limited growth that is proposed at the (15) Villages, there is correspondingly few infrastructure projects that have been identified in these settlements.

Key infrastructure issues

Communications Technology

- 13.3 Broadband and mobile phone signals are often poorer in rural areas. The continued improvement of rural broadband and mobile phone signals is being rolled out through the Connecting Devon and Somerset programme, funded by central and local government, and the private sector. The target is superfast broadband for all by 2020. Funding from this programme has been awarded on the basis that it must be spent in areas that will not benefit from commercial investment, which are predominantly rural. This will support sustainable communities by assisting rural businesses and homes (*priority three*).

Education

- 13.4 The provision of primary schools across the Villages and rural areas is good compared to other infrastructure types, with all 15 Villages having a primary school, along with a large number of other settlements in rural areas. However, understandably, there are far fewer secondary schools, with Clyst Valley Community College in Broadclyst being the only secondary school located in a Village. Colyton Grammar School in Colyford (not one of the 15 settlements identified as a 'village' in the Local Plan), around 800m from the Village of Colyton, is a selective secondary school that draws in pupils from a wide catchment area.
- 13.5 Bickton College, located in a large area of parkland just north of the Village of East Budleigh, provides a range of education opportunities from pre-GCSE to Higher Education level. Bickton College focuses on horticulture, agriculture, land management, animals, and food production, with several other courses available. There are currently around 1,000 students at the College, including apprenticeships, although further capacity is available.
- 13.6 Although some primary schools in the Villages and rural areas are operating at or near to capacity, given the limited additional development that is expected in these areas,

few infrastructure improvements are required. An exception is the additional primary education facilities that are critical (*priority one*) at Clyst St Mary, as the primary school will be over capacity due to additional development in the village. The cost is estimated at £640,000, but there is currently a large funding gap of £514,000. An option for the relocation of Tipton St John Primary School to Ottery St Mary is being considered, due to flooding issues at its current site. There is also a desire for a pre-school located at West Hill Primary School (*priority three*).

Energy, Utilities and Waste

13.7 Although utilities infrastructure may be poorer in some rural parts of the district (e.g. some rural areas lack a mains gas supply), these issues are not considered to impact upon the future (limited) development of these areas.

Environment and Green Infrastructure

13.8 Financial contributions towards Habitats Regulations Assessment non-infrastructure mitigation are sought from all new residential development at Villages or rural areas within 10km of the Exe Estuary and Pebblebed Heaths European Sites (*priority one*).

Healthcare

13.9 Some of the Villages have GP services, albeit in most instances as part of a branch surgery, rather than the main surgery.³⁶ There is less opportunity to access to other primary and secondary healthcare facilities in the villages and rural areas. Improvements and expansion to the Broadclyst Surgery are required due to extensive housing development delivered and planned in the vicinity (*priority two*).

Public Services

13.10 Many Villages and other settlements in rural areas contain village/community halls, but access to other public services (e.g. libraries) is less good. Given the limited additional development that is expected in these areas, no infrastructure projects relating to public services have been identified as necessary to support development.

Sport and Recreation

13.11 As with other community facilities, in Villages and rural areas there is less opportunity to access indoor sport and recreation facilities such as sports halls swimming pools, and/or gyms. Of the 15 Villages, only Broadclyst has an indoor sports facility (sports hall), although Colyton Leisure Centre is located at the Grammar school in Colyford, around 800m from Colyton. Outdoor sport and recreation areas such as playing pitches and play spaces are more widely spread. The provision of a full size, sand-based artificial grass pitch at Broadclyst is important to support development (*priority two*), but there is currently a funding gap of just over £750,000. Additional football pitches are sought at Lypstone (*priority three*). A range of other projects identified in the Playing

³⁶ Woodbury and Broadclyst are the only Villages to have a GP Practice main surgery, whilst Beer, Colyton, Newton Poppleford, and Whimple have branch surgeries.

Pitch Strategy located across rural areas are desirable (*priority three*). Other, local priorities for sport and recreation infrastructure are: regeneration of children's play area, tennis court and recreation field in Branscombe; and leisure facilities at Newton Poppleford.

Transport

- 13.12 Transport links vary considerably amongst the Villages and rural areas. For those Villages that are located on 'A' roads, or have a train station (Feniton, Whimple), transport connections are relatively good. However, those other Villages and rural areas typically have poor road and public transport access.
- 13.13 Improvements are sought to Clyst St Mary roundabout (A3052/A376) to address congestion issues at this junction (*priority two*). The cost of these improvements is estimated to be £1m, with no funding committed as yet. Transport infrastructure that has been identified as local priorities are: improve national and local cycle routes between Clyst St Mary and Clyst St George, Topsham and the Exe Estuary Trail; upgrade Pinhoe-Broadclyst cycleway; new footpaths/cycleway, better traffic management, and off-road section of the Exe Estuary Trail through Lymptone.

14. Conclusion

- 14.1 This report has highlighted a number of important infrastructure issues relating to the delivery of new housing and economic development in East Devon. As one would expect, the vast majority of infrastructure requirements are located in Cranbrook and elsewhere in the West End, along with the seven Towns (except Budleigh Salterton where limited growth is proposed).
- 14.2 Several settlements are relying on infrastructure projects that are critical (*priority one*) to delivering the Local Plan and emerging Cranbrook Plan DPD – these relate to:
- Education facilities at Axminster, Clyst St Mary, Exmouth, Honiton, Ottery St Mary, and the West End (north of Blackhorse/Redhayes and Pinhoe);
 - Energy/utilities/waste improvements at Axminster, Cranbrook, and elsewhere in the West End;
 - Environment and Green Infrastructure relating to mitigation requirements for the Exe Estuary and Pebblebed Heaths (including SANGS at Cranbrook and elsewhere in the West End), and delivery of the Clyst Valley Regional Park;
 - Transport improvements at Axminster, Cranbrook, elsewhere in the West End, and Exmouth.
- 14.3 Although funding is identified for many of these critical (*priority one*) projects, in most instances this is not sufficient to cover the total cost. There are also funding gaps for much of the infrastructure which is considered as priority two and three.
- 14.4 The estimated cost of each infrastructure type, by priority, along with identified funding and funding gap, is summarised in figure 14.1 below.

Figure 14.1: Overall estimated cost of Infrastructure projects

	Infrastructure type	Cost	Funding secured	Funding gap
Priority One	Education	£34,548,272	£20,717,910	£13,830,362
	Energy, Utilities and Waste	£6,000,000	£0	£6,000,000
	Environment and Green Infrastructure	£19,914,510	£10,667,107	£9,247,403
	Transport	£49,775,000	£7,120,000	£42,655,000
Priority Two	Education	£35,890,870	£5,725,355	£30,165,505
	Environment and Green Infrastructure	TBC	TBC	£0

	Flood Risk and Coastal Change Management	£9,000,000	£5,700,000	£3,300,000
	Healthcare	£20,400,000	£0	£20,400,000
	Public Services	£1,779,656	£0	£1,779,656
	Sport and Recreation	£28,855,735	£4,651,190	£24,204,545
	Transport	£9,000,000	£3,700,000	£5,300,000
Priority Three	Communications and Technology	Not specified for East Devon	Not specified for East Devon	£0
	Education	£500,000	£0	£500,000
	Flood Risk and Coastal Change Management	£22,700,000	£19,600,000	£3,100,000
	Healthcare	£98,136,000	£0	£98,136,000
	Public Services	£1,525,000	£0	£1,525,000
	Sport and Recreation	£3,453,423	£547,000	£2,906,423
	Transport	£8,600,000	£700,000	£7,900,000
	TOTAL COSTS/ FUNDING	£350,078,466	£79,128,562	£270,949,894

- 14.5 As the table shows, the infrastructure costs associated with delivering the adopted Local Plan, and the emerging Cranbrook Plan, are significant. Out of a total cost of some £350m, around £79.1m has been secured, leaving a total funding gap of some £270.9m. It should be noted that some of the projects have not yet been costed so this is likely to be an underestimate. For critical (*priority one*) and important (*priority two*) infrastructure, the costs are particularly high for transport and education;³⁷ although the highest total cost is for healthcare infrastructure mainly due to several extra care housing schemes.
- 14.6 A key risk for infrastructure delivery is the current funding gap, particularly in relation to critical (*priority one*) projects. As discussed in chapter 4, funding can be sought from a range of sources, including planning obligations; Community Infrastructure Levy; and grant/loan funding from the district council, national Government, and other bodies such

³⁷ This is reflected in national research which identified consensus that the principle expenditure items for CIL are transport and education – “The value, impact and delivery of the Community Infrastructure Levy, DCLG, February 2017”.

as the LEP. The CIL income that will be available to the council to spend on infrastructure projects is currently estimated to be £30.8m, so it is clear that this range of other sources of funding will need to be levered in. It may be that town/parish councils will contribute to some of the projects through the “neighbourhood proportion” of CIL that they receive; and the district council will work with them to discuss their priorities.

- 14.7 The council will continue to monitor infrastructure issues in relation to the delivery of new housing and economic development proposed in the adopted Local Plan, and the emerging Cranbrook Plan. The Infrastructure Delivery Plan will be subject to regular review to ensure that it responds to changes relating to the completion of infrastructure projects, opportunities/requirements from new development and the emerging Cranbrook Plan, and as pressures change over time.

Appendix One – Infrastructure Schedule

The infrastructure schedule, categorised by priority order (one, two, and three), is set out below. Local priorities are also identified, as identified by town and parish councils in consultation on the IDP and Planning Obligations SPD, and Neighbourhood Plans that have been 'Made'. Infrastructure projects from the previous IDP (March 2015) that have been complete or are under construction have been removed from the schedule – these are also listed below.

It should be noted that the costs of the infrastructure projects are estimates, and may change following more detailed assessment as and when the projects are developed. In addition, some of the projects are yet to be costed. Funding secured (S) means that money has been agreed for the project e.g. in an agreed s.106, from a local authority capital programme, or grant/loan funding; whilst funding potential (P) refers to ongoing considerations/discussions for funding options, including through CIL. The timescale has been informed by consultation responses and development projections in the latest Housing Monitoring Update (March 2017).

PRIORITY 1: fundamental to the delivery of the vision, objectives and policies of the Local Plan. This infrastructure is critical, without which development may not be able to commence and the Local Plan is likely to fail.								
Location	Type	Project	Cost	Funding Secured (S) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
Axminster	Education	New/Expanded Primary Provision	£4,000,000	Existing s.106: 10/0816/MOUT (Cloakham Lawn) £388,734, 11/0718/MFUL £43,320. DCC, CIL (P)	£3,567,946	2019-2027	Developer, Devon County Council	Current primary schools are nearing capacity. LP Strategy 20 identifies need for an additional 210 pupil places plus early years at mixed-used allocation. School size may need to increase to accommodate additional houses if more is permitted than allocated in Local Plan.
Axminster	Education	Secondary education facility	£2,500,000	£279,590 received in s.106 (S) plus commitments of 13/1401/MOUT £4,223, 10/0816/MOUT £295,504, 11/0718/MOUT	£1,870,807	2017-2031	Developer, Devon County Council	By 2031 due to the additional development set out in the Local Plan further developer contributions will be required.

PRIORITY 1: fundamental to the delivery of the vision, objectives and policies of the Local Plan. This infrastructure is critical, without which development may not be able to commence and the Local Plan is likely to fail.								
Location	Type	Project	Cost	Funding Secured (S) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
				£35,569, 13/1091/MOUT £14,307. DCC, CIL (P)				
Clyst St Mary	Education	Primary education facilities	£640,000	s106 - £22,983 (009/1486/MFUL), £36,924 (10/1242/MFUL), £35,000 (13/0365/MOUT) (S). Plus 10/1591/MOUT £31,244 (P). DCC, CIL (P)	£513,849	2017-2022	Developer, Devon County Council	Clyst St Mary Primary School will be over capacity by 2031. Additional educational facilities are needed to support development which is currently being built. Need discussed in Bishops Clyst Neighbourhood Plan.
Exmouth	Education	Expansion of Exmouth Community College	£2,700,000	Plumb Park 13/0297/MOUT £750,000 (resubmitted under CIL) (S). DCC, CIL (P)	£1,950,000	2017-2021	Devon County Council, Developer	With the potential for over 1300 dwellings within the school catchment area, the college will be over capacity within the plan period. Phase 1 expansion has been completed, phase 2 is planned at a cost of £2.7m. In addition, £150k is notionally committed to support bid for additional schools/community sports provision.
Honiton	Education	Additional Primary School facilities	£2,800,000	s.106 Land West of Hayne Lane (13/2744/MOUT) £852,112. Basic Need £1,100,000 (S). DCC, CIL (P)	£847,888	2021-2023	Devon County Council, Developer	Required to meet the needs of development allocated within the plan period.
Ottery St Mary	Education	Additional 210 place primary provision to serve additional pupils in Ottery (option for the potential relocation of Tipton St	£4,700,000	S.106 expected includes: 14/1227/MOUT £127,817; 14/2419/FUL	£2,000,000	2019-20	Developer, Devon County Council	LP Strategy 24 states further development will require additional primary school provision. Potential Tipton relocation is

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		John Primary School to Ottery due to flooding issues at its current site)		£88,820; 12/2341/MOUT £173,262. CIL, Basic Need/ Section 106 & LCVAP (for Tipton) (P)				subject to consultation - the funding gap would reduce to £1m if Tipton relocates.
West End - North of Blackhorse/Redhayes	Education	New Primary School up to 420 places at land North of Blackhorse/Redhayes (Tithebarn Green / Mosshayne)	£7,100,000	S106 of £1,566,000 agreed on basis of 522 dwellings - taking into account 1 bed units (12/1291/MOUT), and additional £3m s106 from Mosshayne development (S). DCC, CIL (P)	£2,534,000	2017-2026	Developer, Devon County Council	LP Strategy 13. New school plus 1.6 ha site to serve development. Alternative provision may also be made at Monkerton in Exeter. Excludes cost of land (0.86ha to be provided by Mosshayne development). Mosshayne planning application re-submitted - will now be considered under CIL system, which could mean the potential contribution may not be secured.
West End - Pinhoe	Education	New 420 place Primary provision including nursery	£7,100,000	s106 (£1m 10/0641/MOUT, £1.29m 12/0795/MOUT, £105k 13/0215/MOUT, and future S106s including potential £1.05m from 13/0001/MOUT) (A)	£0	2017-2021	Devon County Council, Developer	LP Strategy 14. Planning application 17/0372/MFUL for primary school pending a decision. To deliver scheme part facilitated by existing commitments. Land costs are not included in the cost. Project being delivered through Free School Programme
West End	Education	Secondary education provision to accommodate development at the West	£3,008,272	S106, EFA, Mosshayne Section 106 – (900 @ £2,736	£545,872	2017 onwards	Developer, Devon County Council	LP Strategy 11. Mosshayne planning application re-submitted - will now be considered under CIL system, which

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		End (excluding Cranbrook).		per dwelling) (S). DCC, CIL (P)				could mean the potential contribution may not be secured.
Axminster	Energy, Utilities and Waste	Secure drainage improvements for the town to mitigate likely environmental impact of new dwellings.	No Data Available	South West Water, Developers	No Data Available	2017-2031	Developers, South West Water	LP Strategy 20. Sewerage improvements for Axminster where necessary will/have been secured through the imposition of planning conditions and subsequently funded jointly by Developers/ South West Water under the terms of S98 of the Water Act (Sewer Requisitions).
Cranbrook - Expansion Areas and West End	Energy, Utilities and Waste	Expand existing Skypark Combined Heat and Power system to connect with major new development at Cranbrook and Skypark	Not known	E.ON, reimbursed by requiring development to connect to system (P)	Not known	2017- 2031	Developer, E.ON	LP Strategy 11, 12, 13. Seek to expand existing Combined Heat and Power district heating system into new development at Cranbrook, Skypark and other major schemes in the West End. See Heat Network Strategies for the West End of East Devon, Dec 2016.
Cranbrook - Expansion Areas	Energy, Utilities and Waste	Underground high voltage electricity power lines	£6,000,000	Western Power Distribution, Developers (P)	£6,000,000	2020-2031	National Grid, Western Power Distribution, Developers	Required to deliver Cranbrook Plan DPD 'preferred approach'. Cost may potentially be recovered through compensatory arrangement for overhead lines.

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West End - Pinhoe, Science Park, North of Blackhorse/Redhayes	Energy, Utilities and Waste	Extension of Monkerton District Heating network to serve Pinhoe, Science Park, north of Blackhorse/Redhayes	Not known	E.ON, reimbursed by requiring development to connect to system (P)	Not known	2017-2032	Developer, E.ON	Formally announced in December 2015. LP Strategy 11, 13, 14.
East Devon (Exe Estuary)	Environment and Green Infrastructure	Exe Estuary Habitats Mitigation	£3,406,189	£2,483,668 (S); CIL, s.111 (P)	£922,521	2017-2031 and beyond	East Devon District Council, Natural England, Developers, Landowners	The SE Devon European Site Mitigation Strategy (June 2014) identifies a range of mitigation measures. Costs and funding gap from 'Rebasing the SEDESM – the strategic response' (July 2017), split across East Devon, Exeter and Teignbridge local planning authorities, which includes both "infrastructure" and "non-infrastructure" projects - the infrastructure elements will be delivered from CIL receipts, whilst non-infrastructure through s.111.
East Devon (Pebblebed Heaths)	Environment and Green Infrastructure	Pebblebed Heaths Habitats Mitigation	£3,127,067	£2,271,686 (S); CIL, s.111 (P)	£855,381	2017-2031 and beyond	East Devon District Council, Natural England, Developers, Landowners	The SE Devon European Site Mitigation Strategy (June 2014) identifies a range of mitigation measures. A Pebblebed Heaths Visitor Management Plan was published in July 2017. Costs and funding gap from 'Rebasing the SEDESM – the strategic response' (July 2017), split across East Devon, Exeter and Teignbridge

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								local planning authorities, which includes both "infrastructure" and "non-infrastructure" projects - the infrastructure elements will be delivered from CIL receipts, whilst non-infrastructure through s.111.
East Devon	Environment and Green Infrastructure	Suitable Alternative Natural Greenspace (SANGs)	£6,381,254	£5,471,753 (S). S.111 (P)	£909,501	2016-2031 and beyond	Developer, East Devon District Council	Costs taken from 'Rebasing the SEDESMS – the strategic response' (July 2017), split across East Devon, Exeter and Teignbridge local planning authorities. This cost does not include on-site SANGS being at some large developments (e.g. Cranbrook Expansion Areas, Pinhoe urban extension, N. of Blackhorse/ Redhayes).
West End	Environment and Green Infrastructure	Clyst Valley Regional Park	£7,000,000	£440,000 s.106 for Clyst Valley Trail (S). CIL, Enterprise Zone, Environmental Stewardship, Catchment Restoration Fund, HLF (P)	£6,560,000	2017-2031	East Devon District Council, Devon County Council, Natural England, Environment Agency, Developers, Landowners	LP Strategy 10 identifies an area of 2,430 ha to form the Clyst Valley Regional Park. The National Trust is a significant land owner - the Killerton Estate covers 42% of the proposed Park and is already a major recreational, heritage, and landscape asset which will be respected. The initial cost of £6.72m would deliver 36km of new recreational trails to link existing and new

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								communities to the countryside. A further £0.28m will deliver "minor" improvements to the existing network. Cost includes a 10km commuting and recreational Clyst Valley Trail which will form the backbone of the Park, with an estimated cost of £5m. However, making the Park accessible is one of several objectives, which include landscape and habitat restoration and creation, heritage conservation, interpretation, educational and visitor facilities e.g. visitor centres, café, toilets. The full cost of the new Park will be set out in a 25 year vision and 5 year action plan to be produced in 2019 from a programme of public consultation. Only some parts of the overall park will be considered as SANGS.
Axminster	Transport	North - South Relief Road	£16,700,000	DCC, s.106/278, CIL (P)	£16,700,000	2020 - 2030	Developer, Devon County Council	LP Strategy 20 includes provision for a relief road in conjunction with development sites to the east of the town, linking the A358 to the B261. Road required to access site. Land safeguarded by

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								Policy TC8. Work in relation to the detailed route of the road is ongoing at this stage. A bid of £10m has been made to the Governments' Housing Infrastructure Fund.
Cranbrook - Expansion Areas	Transport	New junctions required on the B3174 (London Road) to serve Cranbrook Expansion Areas	TBC	s.106/278 (P)	£0	2021 - 2031	Devon County Council, Developer	LP Strategy 12. Required to deliver the emerging Cranbrook Plan DPD.
Cranbrook - approved development and Expansion Areas	Transport	Second Phase of new bus service (no. 4) for Cranbrook, Skypark, Science Park and Exeter City Centre	£1,700,000	£106 - £920,000 (£660,000 from Skypark, £260,000 from Science Park) (S). DCC, Cranbrook, Science Park and other local developments (P)	£780,000	From 2018 onwards	Network Rail, Devon County Council	LP Strategy 11. Increase to a 15 minute service linking Cranbrook, Skypark & Science Park into city centre; or continued support for half hourly service (depending on rate of development/commercial viability)
West End	Transport	Additional passing loop on Waterloo train line and associated signalling infrastructure	£15,000,000	£3.998m identified as potential contribution in Mosshayne HoT (P). £7.15m requested from Cranbrook expansion areas (P); CIL, DCC, Network Rail / external grants (including major scheme), LEP (P)	£11,000,000	2021 - 2031	Network Rail, Devon County Council	This project would form part of an extension of the Devon Metro structure, and will enable a half hourly service between Axminster and Exeter. It provides mitigation against the road traffic impacts from the Cranbrook expansion areas. Potential location near Feniton. The additional passing loop can enhance capacity through enabling greater train service frequency, making rail a more attractive and effective

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Location	Type	Project	Cost	Funding Secured (S) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
								travel option. Cost is DCC estimate, Network Rail have not yet determined the cost. Mosshayne planning application re-submitted - will now be considered under CIL system, which could mean the potential contribution may not be secured.
Cranbrook - Expansion Areas	Transport	West End cycle routes connecting Cranbrook to nearest settlements and employment and leisure facilities	£3,975,000	S. 106 from Cranbrook Expansions (P)	£3,975,000	2021-2026	Devon County Council, Developers, East Devon	Required to deliver emerging Cranbrook Plan DPD and LP Strategy 11, 12.
Exmouth	Transport	Road extension – The completion of Dinan Way to the A376	£10,000,000	S106, CIL, DCC, bid being made to Local Growth Fund of approx. £3m (P)	£8,500,000	2021-2024	Devon County Council, Developer	This scheme is in Local Plan Strategy 22 to help remove traffic from residential streets and ease access to the south east parts of the town. Land required is safeguarded by Policy TC8. DCC currently considering a planning application for this scheme, so project planning is advanced.
West End - Pinhoe	Transport	Improved pedestrian/cycle/vehicular facilities on Langaton Lane (section east of M5 bridge to Tithebarn Lane)	£1,000,000	£700,000 s.106 (S) Developers (Pinn Court), s.106/s.278 (P). DCC (P)	£300,000	2017-2021	Devon County Council, Developer	This project is required in order to reflect the Pinhoe Access Strategy.

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West End - Exeter Airport Business Park	Transport	Widening improvements to Exeter Airport Business Park Link Road (Long Lane) enabling safer access and improved forward visibility for increased traffic	£1,400,000	Developer (FAB link), DCC, CIL (P)	£1,400,000	2017-2031. To be delivered in phases, dependent on 5 ha Employment site plans.	Devon County Council	LP Strategy 18. Land safeguarded in LP TC8. Widening works along the Airport Business Park Link Road are proposed within the FAB link building application (16/2997/OUT), currently pending a decision.

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Location	Type	Project	Cost	Funding Secured (S) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
Cranbrook - approved development and Expansion Areas	Education	Children's Centre	£432,000	s106 (either direct provision or £432k agreed) (S). DCC, s.106, CIL (P)	£0	2018-2031	Developer, Devon County Council	A site of 0.1 Ha has been agreed in the s106 for Cranbrook phase 1 at 3500 dwellings (as amended by Deed of Variation)- identifies direct provision of a facility of 250 sq m or contribution of £432k. In future s106 agreements, DCC will require additional space at the primary schools to facilitate children's centre services delivery - the cost of this will be included in the school specification and may be around £50,000 per school (this cost has been added to West and East primary schools). Also, potential future s.106 for fit out costs.
Cranbrook - Expansion Areas	Education	West Primary school of 420 places plus early years (including for 2 year olds) and community room	£7,198,000	£0. DCC, CIL(P)	£7,198,000	2021 - 2025	Developer, Devon County Council	Project cost includes £50,000 for provision of a community room but does not include the requisite 2.0 Ha of land. One of the new primary schools at Cranbrook will be required prior to occupation of the 3501st dwelling at the town.
Cranbrook - Expansion Areas	Education	East primary school of 630 places plus early years including for 2 year olds, children's centre services etc.	£10,772,000	£0. DCC, CIL(P)	£10,772,000	2026 - 2031	Developer, Devon County Council	Project cost includes £50,000 for provision of a community room but does not include the requisite 2.9 Ha of land, One of the new primary schools at Cranbrook will be required prior to the occupation of the 3501st dwelling at the town.
Cranbrook - Expansion Areas	Education	Enhanced Secondary education provision – expansion to around 1125 places.	£4,275,000	£1,534,985 s.106 (S); DCC, CIL, s.106 (P)	£2,740,015	2021 - 2031	Developer, Devon County Council	The funding gap is based upon the dwelling numbers in the original three expansion areas applications which

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								generate 125 spaces over 1,000, so the stated funding gap may reduce if total dwelling numbers are lower – TBC in due course.
Cranbrook - Expansion Areas	Education	Special Educational Needs (SEN) provision	£5,400,000	£0. DCC, s.106, CIL (P)	£5,400,000	2019-2031	Devon County Council	Special School proposed to be located at Cranbrook (DCC Education Infrastructure Plan 2016-2033).
Exmouth	Education	New 210 Primary provision with nursery, at the Goodmores Farm allocation site or expansion of Brixington to 630 places (additional 210 places).	£4,000,000	s106 (s106 - £299,881 (09/2331/MFUL)) CIL, 13/0297/MOUT £750,000 (resubmitted under CIL), 14/1542/MFUL £61,341, 01/P0218 £5,666, 08/0245/FUL £11,871 (S). DCC, CIL (P)	£2,871,241	2025-2027	Devon County Council, Developer	LP Strategy 22. Expanded schools will provide some additional capacity, but additional provision required later in the plan period. The cost does not include land purchase.
Ottery St Mary	Education	Secondary education facilities	£1,340,423	s106 - £73,291 (11/2481/MFUL), £355,699 (12/0277/MOUT) or £451,464 (12/2341/MOUT), S.106: 12/2648/MOUT £328,320, 14/1227/MOUT £123,120, 14/2419/FUL £84,820	£0	2017-2031	Devon County Council, Developer	The Kings School will be over capacity due to additional dwellings in catchment area. Kings has indicated that it currently has no land on which to expand (DCC consider adjacent LP allocation should be for primary provision) and no finances to buy land or create the significant build to take more students. Cost does not include additional land costs or contributions towards home to school transport.

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Location	Type	Project	Cost	Funding Secured (S) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
Seaton	Education	Seaton Primary School education facilities - expansion	£1,400,000	09/0022/MOUT est. £400,000, 13/1091/MOUT £102,253, 15/1195/MOUT £56,807. DCC, CIL (P)	£840,940	2017-2021	Devon County Council, Developer	LP Strategy 25. Seaton Primary School is predicted to be over its current capacity during planning period and will potentially need to be expanded. Additional capacity to be provided through an extension to existing buildings.
Sidmouth	Education	Sidmouth College Secondary education facilities - expansion	£573,447	£158,574 comprised of s106: £77,181 (09/1820/MFUL) £5,556 (06/1760) £17,837 (10/0905/MFUL), £58,000 (11/0953/MFUL).	£0	2017-2021	Devon County Council, Developer	LP Strategy 26(4). Additional capacity to be provided through an extension to existing buildings.
Sidmouth	Education	Primary education facilities	£500,000	09/1820/MFUL) £22,723 CIL/EFA/DCC. £125,620 (09/2093/MFUL) 06/116//FUL £8,148. DCC, CIL (P)	£343,309	2017-2021	Devon County Council, Developer	LP Strategy 26(4). Sidmouth Primary School is anticipated to be over capacity in the plan period based on current capacity.
Cranbrook - approved development	Environment and Green Infrastructure	Country Park Resource Centre	TBC	s.106 Schedule 10 (S)	£0	2017-2019	East Devon District Council, Developers	Prior to first occupation of 1,500 dwellings the location should be identified, and the Resource Centre completed within 18 months of this being agreed.

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Location	Type	Project	Cost	Funding Secured (S) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
Sidmouth	Flood risk and Coastal Change management	Beach Management Scheme	£9,000,000	EDDC Capital, DCC Capital, RFCC Local Levy, FCRMGiA, Sidmouth Town Council Capital, Residents, Businesses (all P)	£3,300,000	2019 onwards	East Devon District Council	To maintain the standard of protection against flooding and coastal erosion for Sidmouth, and reduce the rate of erosion on East Beach. Economic benefit of reduced damages to homes and businesses, and amenity and economic benefit of beach to the district. Area which will benefit includes LP allocation of Land at Port Royal Site, and other aspects of LP Strategy 26 for enhancing the town centre.
Broadclyst	Healthcare	Expansion of GP practice	£60,000	£0. CIL (P)	£60,000	2017-2031	Clinical Commissioning Group, NHS England	Required due to extensive housing development both delivered, and planned, in the vicinity. Extension to provide first floor accommodation that will accommodate 2 GP consulting rooms, Nurse treatment room, small sub-waiting area and admin/storage space.
Cranbrook - approved development and Expansion Areas	Healthcare	Health and Well-being Hub building	£10,000,000	£0. S.106 Schedule 21 secures 0.7 ha of land, to be shown on a location plan prior to the first occupation of 1250 dwellings (S), CIL (P)	£10,000,000	2017-2031	Clinical Commissioning Group, NHS England	LP Strategy 12. In the s106 Deed of Variation for the 587 dwelling application, the Complex has been separated into individual uses and the health and wellbeing land has a land take of 0.7 Ha. Building will be home to a range of primary and secondary care services, with the floor area TBC. The cost comprises build and fit out, but is an estimate that needs to be confirmed.

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Location	Type	Project	Cost	Funding Secured (S) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
Cranbrook - approved development and Expansion Areas	Healthcare	Extra Care Housing Scheme of 55 flats	£10,340,000	Serviced land for Extra Care prior to first occupation of 2500 dwellings in s.106 (S). s.106 (P)	£10,340,000	2020-2033	Developer, Devon County Council, Care Provider	Requirement for 0.5 ha of land agreed in s.106, but extra 0.1 ha required for Expansion Areas. See Extra Care Housing- Refresh of the Commissioning Strategy for Extra Care Housing, Devon CC, 2015. Previous evidence is reflected in LP Strategy 36.
Seaton	Healthcare	Expansion of GP practice	TBC	£93,500 from 09/0022/MOUT (S). CIL (P)	TBC	2017-2031	Clinical Commissioning Group, NHS England	Seaton and Colyton GP practice is undersized and options for expansion are currently being considered.
Sidmouth	Public Service	Infrastructure associated with the delivery of Port Royal allocation	TBC	TBC	TBC	TBC	TBC	Site allocated for 30 dwellings and other mixed-uses in Local Plan Strategy 26. Scoping study for Port Royal began in February 2017 - due to be complete in summer 2017.
Cranbrook - approved development and Expansion Areas	Public Service	"Blue Light" Emergency services facility	£1,300,000	£0. Serviced land delivery obligation is for delivery at 2,500 occupations (S); s.106, CIL (P)	£1,300,000	2020-2031	Devon and Somerset Fire and Rescue Service, Devon and Cornwall Police, South Western Ambulance Service	Requirement for a combined "blue light" facility for the three emergency services, sited on a 0.25 hectare site (the land take allocation for Devon & Cornwall police) located on the Eastern periphery of Cranbrook development with good links to the main arterial road network. Indicative layout plans indicate a two storey building of 394 m2 would be required with a cost (4Q 2015) of circa £1.3m (excludes land purchase as it is anticipated that the facility would be built on the land allocated to DCP).

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Location	Type	Project	Cost	Funding Secured (S) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
Cranbrook - approved development	Public Service	Youth services facility (build)	TBC	s.106 (S)	£0	To be complete prior to first occupation of 3450 dwellings, likely to be 2023 onwards	Developer, Devon County Council, Cranbrook Town Council	Size of 480 m2, to be provided by the developer to agreed specification. 0.2 Ha of land has already been agreed in the permission for 2900 dw. The deed of variation for the 587 dwelling application identifies a floorspace of 480 sq m.
Cranbrook – Expansion Areas	Public Service	Youth services facility (fit-out)	TBC	CIL, s.106 (P)	TBC	As above.	Developer, Devon County Council, Cranbrook Town Council	Required to fit out the building detailed above.
Cranbrook - approved development	Public Service	Town Council Office	TBC	s.106 (S)	£0	To be complete prior to first occupation of 3450 dwellings, likely to be 2023 onwards	Developer, Cranbrook Town Council	230 sq m in size
Cranbrook - approved development	Public Service	Library facilities (build)	TBC	s.106 Schedule 19 makes provision for library space and parking (S);	£0	Library to be complete prior to first occupation of 3450 dwellings, likely to be 2023 onwards	Developer, Devon County Council, East Devon District Council	Annual payments of £10,000 due to DCC as the “annual mobile library contribution” from 2013 for ten years or until the permanent library facility is completed and available for use. Temporary library provision currently in the Younghayes Centre. Completion of library required by 3450th dwelling occupation - fit out costs to be sought from expansion areas. Preference for co-location with Town Council offices.

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Location	Type	Project	Cost	Funding Secured (S) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
Cranbrook - Expansion Areas	Public Service	Library facilities (fit-out)	£479,656	s.106 to fit out the library (P)	£479,656	As above	Developer, Devon County Council, East Devon District Council	Required to fit out the building detailed above.
Cranbrook - approved development	Public Service	Public Convenience buildings	TBC	s.106 Schedule 13 (S)	£0	Prior to occupation of more than 2000 dwellings, likely to 2018-2019	Developer, East Devon District Council	Public convenience building to be provided either within a commercially provided building, or prior to first occupation of 2000 dwellings.
Cranbrook - approved development	Public Service	Place of Worship	TBC	s.106 Schedule 22 (S)	TBC	2020-2022	Developer	In the s106 for 2900 dwellings 0.2 Ha of serviced land has been agreed. Floorspace requirements, build costs and future occupier of the Place of Worship to be confirmed.
Axminster	Sport and Recreation	Provision of additional mini 7v7 football pitch at Cloakham Lawn	£55,000	S106 (including provision through Cloakham Lawn), CIL, external funding / grants (P)	TBC	2017 - 2025	Developer, East Devon District Council, local town council	Strategic priority action plans highlighted in Playing Pitch Strategy (adopted 2015).
Axminster	Sport and Recreation	Provision of additional mini 7v7 football pitch at Axminster Town FC new site	£55,000	S106, CIL, external funding / grants (P)	£55,000	2017 - 2025	Developer, East Devon District Council, local town council	Strategic priority action plans highlighted in Playing Pitch Strategy (adopted 2015).
Axminster	Sport and Recreation	Requirement for additional youth 11v11 and 2x mini 5v5 football pitches from Eastern allocation site	£163,000	S106, CIL, external funding / grants (P)	£163,000	2017 - 2025	Developer, East Devon District Council, local town council	Strategic priority action plans highlighted in Playing Pitch Strategy (adopted 2015).
Broadclyst	Sport and Recreation	Provision of full size, sand based artificial grass pitch	£825,000	£68,807 (S) - 14/2761/MOUT (Mosshayne); S106, CIL, external funding / grants (P)	£756,913	2017 - 2025	Developer, East Devon District Council, local town council	Strategic priority action plans highlighted in Playing Pitch Strategy (adopted 2015). Mosshayne planning application re-submitted - will now be considered under CIL system, which could mean

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Location	Type	Project	Cost	Funding Secured (S) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
								this contribution may not be secured.
Cranbrook - approved development and Expansion Areas	Sport and Recreation	Sports Centre and Swimming Pool including 6x lane 25m swimming pool, learner pool, 60x station gym, dance/exercise studio, 4x court sports hall and 2x squash courts, together with wet and dry changing.	£8,000,000	£315,126 (S) - 14/2761/MOUT (Mosshayne); Operator; S106, CIL, EDDC capital for pools (P)	£7,684,874	When population reaches 5,000, likely to be from 2019	Developer, Operator	Sport England "Affordable Sports Centres with Community 25m Pool" Guidance suggests cost of between £5.44m-£7.89m (2015). Should be located on the edge of the town centre with good accessibility by foot, cycle and public transport and link with other associated facilities such as Health and Wellbeing Centre and youth provision. Leisure centre should include family linked, multi-functional activity spaces, where all family members regardless of age can participate in physical activity. Swimming pool will need to be cross subsidised by sports centre. In addition to this project, a sports hall is also located at the nearby secondary school, so consider a different "offer" for each. Mosshayne planning application re-submitted - will now be considered under CIL system, which could mean this contribution may not be secured.

PRIORITY 2: important to deliver specific development schemes and meet the needs of new residents, but the precise timing is less critical.								
Location	Type	Project	Cost	Funding Secured (S) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
Cranbrook - approved development and Expansion Areas	Sport and Recreation	Allotments 0.8ha within the extant permitted area (in 2x clusters); 2.43ha within the expansion areas (in 6x clusters);	£969,000	S106 - 0.8ha (£241,395) (S); s.106 (P)	£727,605	Aim for allotments to be complete by first occupation of 2000th dwelling, likely to be from 2019	Developer, Cranbrook Town Council	In the deed of variation for the 587 planning application 0.8 ha of the sports pitch land (7.3 ha) will be used as allotment provision. Using the Open Space Calculator for an additional 4,370 dwellings (using a 2-4 bed dwelling range) Cranbrook would need approximately 2.43 ha of land for allotments giving a total for 7,857 dwellings of 3.23 ha. In the deed of variation an Allotment Specification and Delivery Programme prior to first occupation of 1500 dwellings will identify the location, layout, specification, delivery programme and future maintenance of the allotments.
Cranbrook - approved development and Expansion Areas	Sport and Recreation	Play Spaces 0.48ha (7x LEAPs, 2 of which have been delivered; 2x NEAP, 1 of which has been delivered) plus 1x skateboard park within the extant permitted area; 0.97ha (1x destination play space incorporating LEAP and NEAP, 7x LEAP, 4x NEAP) within the expansion areas.	£2,465,000	S106 (Schedule 8) - 0.48ha (£815,762) plus skatepark (S); s.106 (P)	£1,649,238	Play area delivery based on occupation of dwellings (See S106) 2017 - 2031	Developer	A land take of 0.48 ha (excluding skatepark) has already been secured through the deed of variation for the 587 dwelling application and the original s.106 for 2900 dwellings. Will be delivered through these permissions. One of the NEAPs with a MUGA has been delivered. Two LEAPs have been delivered. 0.97 ha of play space to be provided in the expansion areas to serve 4,370 dwellings.

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Location	Type	Project	Cost	Funding Secured (S) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
Cranbrook - approved development and Expansion Areas	Sport and Recreation	<p>Natural Grass Sports Pitches organised into two sports hubs</p> <p>7.3ha sports pitch land to serve extant permitted area, comprising of:</p> <ul style="list-style-type: none"> - 0.98ha of land to the rear of St Martin's Primary School; - 0.8ha of land now to be delivered as allotments instead; - 3.11ha (2x adult 11v11 football overmarking 8x wicket cricket ground plus youth 7v7 football) to serve the extant permitted area at Ingram's Land within extant permitted area; - 2.41ha (2x youth 11v11 football plus 1x senior rugby) to serve the extant permitted area to be delivered within the expansion areas. <p>5.29ha (3x adult 11v11 football, 1x youth 11v11 football, 2x youth 9v9 football, 1x senior rugby and 2x midi rugby) to serve the expansion areas to be delivered in the expansion areas.</p> <p>£294,000 off-site contribution towards local cricket club(s) to serve expansion areas.</p>	£2,937,900	S106 (Schedule 9) - 7.3ha of sports pitch land (£1,533,000) (S); CIL, s.106 (P)	£1,404,900	<p>Temporary sports pitch prior to first occupation of 1500th dwelling, approved sports pitches at 2500th dwelling and 3000th dwelling.</p> <p>Trigger points for expansion areas (5.29 ha) and contributions to be agreed.</p> <p>2017 - 2031</p>	Developer, East Devon District Council	For justification and detail see the agreed s.106, the Playing Pitch Strategy, the Sports, Leisure and Recreation at Cranbrook Report, policy response to the expansion area planning applications and further work in support of Heads of Terms for expansion areas.

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Location	Type	Project	Cost	Funding Secured (S) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
Cranbrook - approved development and Expansion Areas	Sport and Recreation	<p>Artificial Grass Sports Pitches</p> <p>3G floodlit Football Turf Pitch (FTP) to at least FIFA 1* performance standard available for full community use to be delivered either within the extant permitted area or at one of the sports hubs.</p> <p>£330,000 off-site contribution towards Clyst Vale Community College sand-based AGP (hockey provision) to serve expansion areas.</p>	£980,000	S106 (Schedule 9) - Floodlit artificial grass pitch (£650,000) (S); s.106 (P)	£330,000	<p>2017 - 2031. See S106 for trigger point for on-site artificial grass pitch</p> <p>Trigger point for contribution from expansion areas to be agreed.</p>	Developer, East Devon District Council	For justification and detail see the Playing Pitch Strategy, the Sports, Leisure and Recreation at Cranbrook Report, policy response to the expansion area planning applications and further work in support of Heads of Terms for expansion areas.
Cranbrook - approved development and Expansion Areas	Sport and Recreation	<p>Changing/clubhouse facilities and car parking for sports pitches</p> <p>Basic sports pavillion with changing rooms and associated car parking at Ingram's Land.</p> <p>Changing/clubhouse facilities (to include changing facilities sufficient to meet the number and type of pitches provided at each hub, sufficient bar/social space, kitchen, dedicated medical room, toilets (separate for players, match officials and spectators), showers (in</p>	£800,000	S106 (Schedule 9) - Sports pavillion with changing rooms and car parking (£250,000) (S); s.106 (P)	£550,000	<p>See S106 for trigger points.</p> <p>Trigger points for expansion area requirements to be agreed.</p> <p>2017-2031</p>	Developer	For justification and detail see the Playing Pitch Strategy, the Sports, Leisure and Recreation at Cranbrook Report, policy response to the expansion area planning applications and further work in support of Heads of Terms for expansion areas.

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Location	Type	Project	Cost	Funding Secured (S) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
		<p>each changing room including the match officials), kit lockers, maintenance storage) and associated car parking to serve additional pitches and sports hubs in the expansion areas.</p> <p>Upgrade of basic sports pavillion at Ingram's Land to meet ECB standards.</p>						
Cranbrook - Expansion Areas	Sport and Recreation	<p>Tennis Courts</p> <p>4x floodlit tennis courts co-located at one of the sports hubs (£350,000)</p> <p>2x tennis courts co-located within residential areas (£60,000)</p>	£410,000	S106, External funding/grants (P)	£410,000	2021-2024	Developer	For justification and detail see the Sports, Leisure and Recreation at Cranbrook Report, policy response to the expansion area planning applications and further work in support of Heads of Terms for expansion areas.
Cranbrook - Expansion Areas	Sport and Recreation	<p>Bowls</p> <p>Provision of 4x indoor mat bowling rinks.</p> <p>Off-site contribution of up to £46,666 towards Broadclyst Bowls Club.</p>	£60,000	s.106 (P)	£60,000	2021-2024	Developer	For justification and detail see the Sports, Leisure and Recreation at Cranbrook Report, policy response to the expansion area planning applications and further work in support of Heads of Terms for expansion areas.
Cranbrook - Expansion Areas	Sport and Recreation	<p>Other open space</p> <p>In addition to the specific open space typologies listed separately above, the expansion areas should also include the following to meet 4,370 dwellings: 3.40ha Amenity open space;</p>	£2,983,181	s.106 (P)	£2,983,181	<p>Trigger points for expansion area requirements to be agreed.</p> <p>2019-2031</p>	Developer	For justification and detail see the Sports, Leisure and Recreation at Cranbrook Report, policy response to the expansion area planning applications and further work in support of Heads of Terms for expansion areas.

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Location	Type	Project	Cost	Funding Secured (S) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
		9.70ha Parks and Recreation Grounds; 9.70ha Natural and semi-natural greenspace						
Exmouth	Sport and Recreation	Strategic priority action plans highlighted in Playing Pitch Strategy: - 1. Provision of additional minimum of 3x senior rugby pitches and 2x midi rugby pitches; 2. Provision of additional 3x youth 11v11, 1x youth 9v9, 2x mini 7v7, 1x mini 5v5 football pitches; 3. Provision of full size, floodlit, World Rugby 22 compliant 3G artificial grass pitch; 4. Improvement of existing playing fields at St Johns Road and Knapp Cross; 5. Improvement of capacity on existing pitches	£3,400,000	£16,873 s.106 (S); CIL, external funding/grants (P)	£3,383,000	2017 - 2025	Clubs, NGBs, EDDC, Sport England, others	Strategic priority action plans highlighted in Playing Pitch Strategy. Costs based on costings in draft Exmouth Sports Pitch Strategy, however this is liable for changes in coming months. Once final version of Exmouth Sports Pitch Strategy is adopted then individual projects will be listed and costed separately.
Honiton	Sport and Recreation	Install drainage to increase pitch capacity at Mountbatten Park	£45,000	CIL, external funding/grants (P)	£45,000	2018 - 2019	Clubs, NGBs, EDDC, Sport England, others	Strategic priority project identified by adopted Honiton Sports Pitch Strategy
Honiton	Sport and Recreation	Enhance/extend/replace existing clubhouse with up to 2 storey building to serve all proposed pitches in this vicinity and explore options for additional car parking at Mountbatten Park	£280,000	CIL, external funding/grants (P)	£280,000	2020 - 2021	Clubs, NGBs, EDDC, Sport England, others	Strategic priority project identified by adopted Honiton Sports Pitch Strategy
Honiton	Sport and Recreation	Install drainage to increase pitch capacity at	£61,000	CIL, external funding/grants (P)	£61,000	2018 - 2019	Clubs, NGBs, EDDC, Sport England, others	Strategic priority project identified by adopted Honiton Sports Pitch Strategy

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		existing St. Rita's sports pitches						
Honiton	Sport and Recreation	Improve accessibility to existing St. Rita's sports pitches, Honiton along Turks Head Lane.	£75,000	CIL, external funding/grants (P)	£75,000	2020 - 2021	Clubs, NGBs, EDDC, Sport England, others	Strategic priority project identified by adopted Honiton Sports Pitch Strategy
Honiton	Sport and Recreation	Install drainage to increase pitch capacity at Allhallows Recreation Ground	£100,000	CIL, external funding/grants (P)	£100,000	2017 - 2018	Clubs, NGBs, EDDC, Sport England, others	Strategic priority project identified by adopted Honiton Sports Pitch Strategy
Honiton	Sport and Recreation	Install floodlights at Allhallows Recreation Ground	£50,000	CIL, external funding/grants (P)	£50,000	2021 - 2022	Clubs, NGBs, EDDC, Sport England, others	Strategic priority project identified by adopted Honiton Sports Pitch Strategy
Honiton	Sport and Recreation	Install floodlit sand-based Artificial Grass Pitch at Honiton Community College	£720,000	CIL, external funding/grants (P)	£720,000	2018 - 2019	School, DCC, Clubs, NGBs, EDDC, Sport England, others	Strategic priority project identified by adopted Honiton Sports Pitch Strategy
Honiton	Sport and Recreation	Deliver new sports pitches as an extension to the existing pitches site at St. Rita's, Honiton. Site to comprise of <i>either</i> : 2x youth 11v11 and 2x mini 5v5 football pitches; <i>or</i> Relocated cricket ground and small cricket pavilion; and explore options for additional car parking	£187,000	CIL, external funding/grants (P)	£187,000	2020 - 2021	Clubs, NGBs, EDDC, Sport England, others	Strategic priority project identified by adopted Honiton Sports Pitch Strategy. Cost excludes land cost.
Honiton	Sport and Recreation	Deliver new sports pitches at the Former Showground, Honiton. Site to comprise of: 2x senior rugby pitches; 3x midi rugby pitches; Changing facilities and car parking	£1,125,000	CIL, external funding/grants (P)	£1,125,000	2020 - 2021	Clubs, NGBs, EDDC, Sport England, others	Strategic priority project identified by adopted Honiton Sports Pitch Strategy. Cost excludes land cost.

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Location	Type	Project	Cost	Funding Secured (S) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
Ottery St Mary	Sport and Recreation	Provision of youth 9v9 football pitch at Winter's Lane recreation ground	TBC	£0. CIL, external funding/grants (P)	TBC	2017 - 2025	Clubs, NGBs, EDDC, Sport England, others	Strategic priority action plans highlighted in Playing Pitch Strategy
Seaton	Sport and Recreation	Relocation of Seaton Town FC to Harepath Road allocation site and provision of additional football pitches. Site to comprise of: 2x adult 11v11 football pitches; 1x youth 9v9 football pitch; Covered stand; Clubhouse; and Car parking	£910,000	£200,000 (S106 - 09/0022/MOUT) (S); CIL, EDDC, external funding/grants (P)	£710,000	2017 - 2025	Developer, Clubs, NGBs, EDDC, Sport England, others	LP Strategy 25. Strategic priority action plans highlighted in Playing Pitch Strategy.
Sidmouth	Sport and Recreation	Installation of floodlights at Sidmouth College artificial grass pitch	£50,000	CIL, external funding/grants (P)	£50,000	2017 - 2025	Clubs, NGBs, EDDC, Sport England, others	Strategic priority action plans highlighted in Playing Pitch Strategy
Sidmouth	Sport and Recreation	Additional / extended changing facilities at Byes Lane	£250,000	CIL, external funding/grants (P)	£250,000	2017 - 2025	Clubs, NGBs, EDDC, Sport England, others	Strategic priority action plans highlighted in Playing Pitch Strategy
Sidmouth	Sport and Recreation	Provision of a floodlit World Rugby 22 compliant 3G training pad	£197,400	CIL, external funding/grants (P)	£197,400	2017 - 2025	Clubs, NGBs, EDDC, Sport England, others	Strategic priority action plans highlighted in Playing Pitch Strategy
Sidmouth	Sport and Recreation	Provision of 1x youth 9v9 and 2x mini 7v7 football pitches	£196,434	CIL, external funding/grants (P)	£196,434	2017 - 2025	Clubs, NGBs, EDDC, Sport England, others	Strategic priority action plans highlighted in Playing Pitch Strategy
West End - Skypark	Sport and Recreation	Replacement of Waterslade Park football pitch (including adult 11v11 football pitch, floodlights, car parking, clubhouse and covered stand).	£505,820	S106 (06/3300/MOUT) - £505,820 (S)	£0	2017 - 2025	Developer	Strategic priority action plans highlighted in Playing Pitch Strategy. Football pitch shown on Skypark Marketing masterplan.
Axminster	Transport	Improved footpath and cycleway within the town linking the Cloakham Lawns and the north and east strategic site with the	£500,000	Investing In Devon funding secured but additional funding required.	Not known	2017-2031	Developer, Devon County Council	LP Strategy 20. Includes Stop Line Way to Seaton and Chard. Also includes improving existing routes and the creation of new –

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Location	Type	Project	Cost	Funding Secured (S) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
		town centre and secondary school and linking to neighbouring settlements						specification should cover for horses and bicycles where possible.
Axminster	Transport	Extend and enhance bus services to serve the new developments around Cloakham Lawns and the north and east strategic site	£500,000	DCC, s.106, external funding/grants (P)	£500,000	2017-2031	Developer, Devon County Council, Bus operator	This includes new bus stops and pedestrian/cycle access where provision has not been previously secured. Aspiration for intra-town service.
Clyst St Mary	Transport	Alterations/ Improvements to Clyst St Mary Roundabout (A3052/A376 junction).	£1,000,000	s.106, CIL, DCC (P)	£1,000,000	2017-2031	Developer, Devon County Council	
Cranbrook - approved development	Transport	Crannaford Level Crossing highway reprofiling	£250,000	s.106 (S)	£0	2017-2021	Network Rail, Devon County Council	Required to address safety risk of potential grounding of HGVs on the level crossing. Scheme has now been approved at East Devon Highways and Traffic Orders Committee (30 Nov 2016). Any further enhancements would most likely be considered alongside the passing loop scheme.
Cranbrook - Expansion Areas	Transport	Second train station; or improvements to existing station	TBC	s.106 being requested through expansion area applications (P); CIL, DCC, Network Rail / external grants (including major scheme), LEP (P)	TBC	2019-2031	Developer, Devon County Council	It is likely that only one of these options will be achievable due to cost. The cost of a second train station is estimated to be £9m, but the detail and cost of improving the existing station are to be confirmed. If a second station is developed, additional track infrastructure would be required to accommodate an increase in service level to meet demand from Cranbrook. Lengthened

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								platforms may also be required.
Honiton	Transport	Improvements to walking and cycling networks - creating links between existing employment and proposed housing sites within the town and to the west, and to primary schools	£500,000	s.106, DCC (P)	£500,000	2017-2019	Devon County Council, Developer	Linked with LP policy TC8. Such links required to deliver s.106 relating to 13/02744/MOUT.
Honiton	Transport	Public transport improvements to serve development to the west of Honiton	£1,000,000	s.106, DCC (P)	£1,000,000	2017-2019	Devon County Council, Bus operator	To serve LP strategic employment site and Hayne Lane housing site. The provision of a new bus stop is required to deliver s.106 relating to 13/2744/MOUT.
Honiton	Transport	Widening and enhancement of Hayne Lane	Not known	Developer funded (in s.106) (S)	£0	2017-2019	Devon County Council, Developer	Required to deliver s.106 relating to 13/2744/MOUT.
West End - Other	Transport	Measures to improve public transport links between Exeter and Exeter Airport Business Park	£1,000,000	s.106, DCC (P)	£1,000,000	Depends on expansion plans: 2017-31	Developer, Devon County Council, Bus operator	LP Strategy 9 and 11. Service would link the Airport, Airport Business Park, Skypark, Cranbrook and Science Park
West End - Pinhoe	Transport	Improved access to rail connections	£300,000	s.106, DCC LTP (P)	£300,000	2017-2018	Devon County Council, Developer, Network Rail, Train Operating Company	This may be through improvements to frequency and/ or improved transport links to the station including the creation of a car park. The station is not located in East Devon but is improving access for Pinhoe allocations in the Local Plan.
West End - Pinhoe	Transport	Enhancement to existing bus services (extension of 1 service)	£1,550,000	s106 (Old Park Farm 1 – 550K, Old Park Farm 2 520K, Pinn Court Farm 440K) (S)	£0	2017-2021	Devon County Council, Bus operator	This is not located in East Devon but is improving access to Pinhoe station for Pinhoe allocations in the Local Plan. To encourage sustainable travel and

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								reduced reliance on private car. LP Strategy 14.
West End - Redhayes	Transport	Tithebarn Lane Bridge - separate foot/cyclebridge to provide additional vehicular capacity	£1,400,000	Fully funded from Housing and Growth Fund bid relating to Tithebarn Link Road (S)	£0	2021-2026	Devon County Council, Developer	Project will support sustainable travel connections to Exeter city centre and mitigate impacts at Junction 29 of the M5. LP Strategy 9 and 11.
West End	Transport	Public Transport enhancements to improve bus priority between Exeter City Centre and West End development	£1,000,000	s106, CIL, DCC (P)	£1,000,000	2021-2026	Devon County Council, Developer, Bus operator	Could include bus priority measures through Science Park / SkyPark. LP Strategy 9 and 11.

PRIORITY 3: enhance the effectiveness, efficiency, and quality of infrastructure. These projects create a better place to live and work, and are generally desirable in order to build sustainable communities. Less detail may be currently available for these projects.								
Location	Type	Project	Cost	Funding Secured (\$) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
East Devon	Communications Technology	Improve rural broadband to ensure superfast broadband for all by 2020	Not specified for East Devon	National and Local Government; private sector (S)	£0	2017- 2020	BDUK, Devon County Council	The Connecting Devon and Somerset programme aims to provide superfast broadband for all by 2020. Growth Deal 3 funding (announced Feb 2017) will help deliver superfast broadband targeting premises within the 'final 5%' not currently served or likely to get served via the private sector, over the next 4 years, to ensure superfast coverage to 100% by 2020. Also 4G rollout to additional 10% coverage (HotSW LEP).
West Hill	Education	Pre-school located at West Hill Primary School	£500,000	£0. CIL, DCC (P)	£500,000	2017-2031	Developer, Devon County Council	
Exmouth	Flood risk and Coastal Change management	Estuarieside flood defence (and potentially Linear Park)	£19,600,000	EA Flood and Coastal Risk Management Grant in Aid (S), EDDC (S)	£0	2017-2020	East Devon District Council, Environment Agency	Funding has been secured for flood defence, with detailed design to start March/April 2017. Potential to also deliver the Linear Park, which is part of Estuarieside Transformation project (Exmouth Town Centre and Seafront Regeneration Masterplan, Dec 2011), although current funding gap.
Exmouth	Flood risk and Coastal Change management	Beach Management Scheme	£3,100,000	EDDC Capital, DCC Capital, RFCC Local Levy, FCRMGiA, Exmouth Town Council Capital (all P)	£3,100,000	2021-2026	East Devon District Council	Beach recharge anticipated to maintain the standard of protection against flooding and coastal erosion for Exmouth. Economic benefit of reduced damage to homes and businesses, and amenity and economic benefit of retaining a beach, related to the delivery of LP Strategy 22 to promote investment in the town centre. Scheme would

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Location	Type	Project	Cost	Funding Secured (S) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
								ensure that beach is maintained which could help reduce visitor impact on SPA.
Axminster	Healthcare	65 unit Extra Care Housing Scheme	£12,220,000	£0. s.106 (P)	£12,220,000	2017-2021	Developer	See Extra Care Housing-Refresh of the Commissioning Strategy for Extra Care Housing, Devon CC, 2015. Previous evidence is reflected in LP Strategy 36.
Exmouth	Healthcare	189 units of Extra Care Housing (likely to be provided across 2 or more schemes)	£35,532,000	£0. s.106 (P)	£35,532,000	2017-2033	Developer, Devon County Council, Care Provider	See Extra Care Housing-Refresh of the Commissioning Strategy for Extra Care Housing, Devon CC, 2015. Previous evidence is reflected in LP Strategy 36.
Honiton	Healthcare	72 bed extra care housing scheme	£13,536,000	£0. s.106 (P)	£13,536,000	2017-2033	Developer, Devon County Council, Care Provider	See Extra Care Housing-Refresh of the Commissioning Strategy for Extra Care Housing, Devon CC, 2015. Previous evidence is reflected in LP Strategy 36.
Ottery St Mary	Healthcare	55 bed extra care housing scheme	£10,340,000	£0. s.106 (P)	£10,340,000	2017-2033	Developer, Devon County Council, Care Provider	See Extra Care Housing-Refresh of the Commissioning Strategy for Extra Care Housing, Devon CC, 2015. Previous evidence is reflected in LP Strategy 36.
Seaton	Healthcare	58 bed Extra Care Housing Scheme	£10,904,000	£0. s.106 (P)	£10,904,000	2017-2033	Developer, Devon County Council, Care Provider	See Extra Care Housing-Refresh of the Commissioning Strategy for Extra Care Housing, Devon CC, 2015. Previous evidence is reflected in LP Strategy 36.
Sidmouth	Healthcare	83 units of Extra Care Housing, likely to be delivered in one scheme.	£15,604,000	£0. s.106 (P)	£15,604,000	2017-2033	Developer, Devon County Council, Care Provider	See Extra Care Housing-Refresh of the Commissioning Strategy for Extra Care Housing, Devon CC, 2015. Previous evidence is reflected in LP Strategy 36.

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Location	Type	Project	Cost	Funding Secured (\$) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
Axminster	Public Service	Library improvements – including the installation of self service.	£25,000	£0	£25,000	2017-2031	Our Libraries Unlimited	No longer proposed by DCC, but library run by "Our Libraries Unlimited". To respond to growth within the town.
Cranbrook - approved development	Public Service	Car, cycle and coach parking in the town centre	TBC	Schedule 24 in s.106 requires implementation of the car parking strategy in the town centre (S)	TBC	2019-2020	Developer, East Devon District Council, Devon County Council	Town centre car, coach and cycle parking facilities will be needed for visitors accessing the amenities and facilities at Cranbrook, including sports and recreation. The space will be part of the town centre land take and should be informed by the car parking strategy and reflected in the master planning exercise.
Cranbrook - Expansion Areas	Public Service	Multi-functional cultural space	TBC	s.106, CIL (P)	TBC	2019-2031	Developer, East Devon District Council	Cultural Development Strategy (June 2016) recommends allocation of flexible space for meanwhile use, and cultural provision.
Cranbrook - Expansion Areas	Public Service	Cemetery	TBC	£0; s.106 (P)	TBC	2019-2031	Developer, East Devon District Council	It is anticipated that a town of 7500 dwellings will require a burial site. The size and location are to be determined through future work and agreed between the Council and developer.
Exmouth	Public Service	Replacement library	£1,500,000	£0. CIL (P)	£1,500,000	2017-2031	Devon County Council	Replace current facility which is too small with poor access. Potential to be a 'Devon Centre' format, providing range of services for town, aspire for a town centre location. Project included in Exmouth Town and Seafrost Masterplan (Dec 2011).
Axminster	Sport and Recreation	New skate park	£250,000	TBC	TBC	2017-2031	EDDC, Axminster TC	Aspiration. Land obtained in Cloakham proposal (17/0384/FUL).

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Location	Type	Project	Cost	Funding Secured (\$) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
Axminster	Sport and Recreation	New Fitness Gym and Studios in Axminster Town	£750,000	£0. LED/commercial funding plus possible S106/CIL/Prudential Borrowing to reduce overall annual revenue cost of leisure (P)	£750,000	2017-2020	LED, Developer	To address capacity, parking and access issues at the School site. Improved infrastructure required to remedy pre-existing deficiencies made more severe by new development; cost can be met or supplemented by commercial funding from LED/private sector
Axminster	Sport and Recreation	Swimming Pool - improve parking, access and changing	TBC	Owned and operated by local charity (Flamingo Pool) (P)	TBC	2017 - 2026	Flamingo Pool	In conjunction with Axminster Leisure Centre and Flamingo Pool. Improved infrastructure required to remedy pre-existing deficiencies made more severe by new development
Axminster	Sport and Recreation	Add parking and improve access at Axminster Leisure Centre	TBC	LED/commercial funding plus possible S106/CIL/Prudential Borrowing to reduce overall annual revenue cost of leisure (P)	TBC	2017-2026	LED	Existing Dual Use leisure facility has insufficient parking and access to meet current & new demand
East Devon	Sport and Recreation	Delivery of all other Playing Pitch Strategy projects not otherwise identified in Priority 2 of the IDP	TBC	S106, CIL, external funding / grants (P)	TBC	2017-2025	Clubs, NGBs, EDDC, Sport England, others	Numerous additional projects are listed as priority 2 or 3 in the adopted Playing Pitch Strategy - this item covers these.
Exmouth	Sport and Recreation	Queen's Drive leisure area - watersports centre and mixed leisure use (including realignment of Queen's Drive)	TBC	Bid submitted to Coastal Communities Fund for £1.3m, DCC (P)	TBC	From 2018	East Devon District Council, Devon County Council, Developer	Included in Exmouth Town Centre and Seafront Masterplan (Dec 2011). Reserved matters planning application submitted in Dec 2016. Road realignment to cost £2.2m.

PRIORITY 3: enhance the effectiveness, efficiency, and quality of infrastructure. These projects create a better place to live and work, and are generally desirable in order to build sustainable communities. Less detail may be currently available for these projects.								
Location	Type	Project	Cost	Funding Secured (\$) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
Honiton	Sport and Recreation	Swimming pool changing rooms refurbishment	£159,500	£79,750 in EDDC Capital programme (S); remainder to come from CIL, LED or Sport England (P)	£79,750	2017-2018	LED, East Devon District Council	Need modernisation to cope with increasing demand from growth and social (family) requirements. Assumption that EDDC provide 50% of cost. Potential for cost to rise when it reaches tender stage.
Lympstone	Sport and Recreation	Provision of additional football pitches	TBC	CIL, external funding/grants (P)	TBC	2017 - 2025	Clubs, NGBs, EDDC, Sport England, others	Strategic priority action plans highlighted in Playing Pitch Strategy.
Ottery St Mary	Sport and Recreation	New Fitness Gym and Studios in Ottery Town	£750,000	£0. LED/commercial funding plus possible CIL/Prudential Borrowing to reduce overall annual revenue cost of leisure (P)	£750,000	2017-2018 or during early Cranbrook growth phase	LED, East Devon District Council	To address demand and access issues at The Kings School plus early Cranbrook growth. Improved infrastructure required to remedy pre-existing deficiencies made more severe by new development.
Ottery St Mary	Sport and Recreation	Improve access and add car parking at Ottery St Mary Leisure Centre	TBC	TBC. LED/commercial funding plus possible CIL/Prudential Borrowing to reduce overall annual revenue cost of leisure (P)	TBC	2017 -2031	LED, East Devon District Council	LED - Existing Dual Use leisure facility has insufficient parking and access to meet current & new demand
Seaton	Sport and Recreation	Swimming Pool enhancements	£125,000	£0. CIL, EDDC Capital (P)	£125,000	2017-2020	LED, East Devon District Council	Additional investment to improve parking, signage, changing, security, landscaping. Required to remedy pre-existing deficiencies made more severe by new development.
Sidmouth	Sport and Recreation	New Fitness Gym and Studios in Sidmouth Town	£750,000	£0. LED/commercial funding plus possible CIL/Prudential Borrowing to reduce overall annual revenue cost of leisure (P)	£750,000	2017-2020	LED, East Devon District Council	To address capacity, parking and access issues at the School site. Required to remedy pre-existing deficiencies made more severe by new development

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Location	Type	Project	Cost	Funding Secured (S) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
Sidmouth	Sport and Recreation	Improved parking and access at Sidmouth Leisure Centre	TBC	TBC. LED/commercial funding plus possible CIL/Prudential Borrowing to reduce overall annual revenue cost of leisure (P)	TBC	2017 - 2031	LED, East Devon District Council	Required to meet current & new demand.
Sidmouth	Sport and Recreation	Swimming pool refurbishment	£434,500	£217,250 in EDDC Capital programme (S); remainder to come from LED or Sport England (P)	£217,250	2018-2019	LED, East Devon District Council	Assumption that EDDC provide 50% of cost. Potential for cost to rise when it reaches tender stage.
West Hill	Sport and Recreation	Provision of additional 1x youth 11v11 and 2x mini 7v7 football pitches preferably in West Hill	£234,423	CIL, external funding/grants (P)	£234,423	2017 - 2025	Clubs, NGBs, EDDC, Sport England, others	Strategic priority action plans highlighted in Playing Pitch Strategy
Axminster	Transport	Stony Lane junction improvements	TBC	£40,000 s.106 (S); s.106, CIL, DCC (P)	TBC	2017-2031	Devon County Council	
Axminster	Transport	Regeneration of town centre - pedestrianisation, one way street system	TBC	TBC	TBC	2017-2031		Linked with LP Strategy 20(3), including regeneration of Webster's Garage site. Town centre congestion issues referenced in LP para 8.7(h).
Axminster	Transport	Weycroft bridge improvements	Not known	s.106, CIL, DCC (P)	Not known	2017-2031	Devon County Council	This includes cycle provision associated with the stop line way. Feasibility and costing is being worked up by DCC.
Exmouth	Transport	Cycle/walking links between development sites and schools, employment sites, town centre (including bus and train station), Exe Estuary Trail and Valley Parks	£700,000	DCC and s.106 - £100,000 identified for improvements following a town wide survey (S)	£600,000	2017-2031	Devon County Council, Developer	LP Strategy 22, 5e). A full site survey and remedial works to instigate the intended connections is required. Included in Exmouth Town Centre and Seafront Masterplan (Dec 2011).

PRIORITY 3: enhance the effectiveness, efficiency, and quality of infrastructure. These projects create a better place to live and work, and are generally desirable in order to build sustainable communities. Less detail may be currently available for these projects.								
Location	Type	Project	Cost	Funding Secured (\$) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
Exmouth	Transport	Continuation of support for public transport, potentially including bus services and rail provision within the town.	£1,000,000	£0. s.106, DCC (P)	£1,000,000	Post 2014/15 for Monday to Friday Service; immediately for Saturday service.	Developer, Devon County Council, Bus operator	LP Strategy 22, 5a).
Exmouth	Transport	Foxholes redevelopment including road alignment	£2,000,000	£500,000 (S); s.106, DCC (P)	£1,500,000	2017-2020	East Devon District Council, Devon County Council, Developer	Included in Exmouth Town Centre and Seafront Masterplan (Dec 2011).
Exmouth	Transport	Improvements to existing Avocet Line stations, including lengthening platforms and improving facilities.	£1,000,000	£100,000 secured from s.106 (S); Train operating Company, DfT, DCC. Network Rail, CIL (P)	£900,000	2021-22 (Dependent upon cascading of rolling stock)	Devon County Council, Network Rail, Train Operating Company	LP Strategy 22, 5a).
Exmouth	Transport	Chapel Hill Enhancements	£300,000		£300,000	2017-2020		Reconfiguration and public realm enhancement works. Included in Exmouth Town Centre and Seafront Masterplan (Dec 2011).
Exmouth	Transport	The Promenade - Esplanade and Queen's Drive enhancements	£200,000	£0; s.106, DCC (P)	£200,000	2017-2020		Included in Exmouth Town Centre and Seafront Masterplan (Dec 2011).
Ottery St Mary	Transport	Improvements to walking/cycling networks – creating centre link between the western development sites and town centre, employment areas and schools.	TBC	CIL, Bids/S106/278, DCC (P)	TBC	2017 - 2031	Devon County Council, Developer	LP Strategy 24(5). The scheme involves creating shared use paths alongside the existing highway, Toucan crossings and some areas of new route requiring land negotiation. Where routes pass through development sites they will need to form part of the masterplan. Some

PRIORITY 3: enhance the effectiveness, efficiency, and quality of infrastructure. These projects create a better place to live and work, and are generally desirable in order to build sustainable communities. Less detail may be currently available for these projects.								
Location	Type	Project	Cost	Funding Secured (S) / Potential (P)	Funding gap	Timescale	Delivery Organisation(s)	Notes/additional justification
								in part delivered through BOVIS on site measure Irelands Farm.
Sidmouth	Transport	Provision of new access into the Alexandria Trading Estate from the Bulverton Road (B3176)	£1,000,000	s106, CIL, DCC (P)	£1,000,000	2017 - 2031	East Devon District Council, Devon County Council, Developer	This access would relieve Alexandria Road and Pathwhorlands from industrial traffic and provide a safer access, and would be supported by EDDC (LP para 14.4). There may be potential to link delivery of road with LP employment allocations at Industrial Estate (Strategy 26) which would mean priority 2.
Sidmouth	Transport	Sidmouth to Feniton cycle route	£1,400,000	s.106, CIL, DCC (P)	£1,400,000	2017-2031	East Devon District Council, Devon County Council, Developer	16km route that loosely follows the old railway line. Cost taken from 'Feniton to Sidmouth (Otter Valley) Trail, Feasibility study - draft report', Sustrans, 2014. Cost includes at-grade crossing of the A3052 - a bridge would add £1.5m.
Sidmouth	Transport	Sidmouth to Sidbury cycle route	TBC	s106 £12,000 (12/2222/MOUT) (S)	TBC	2017-2031	East Devon District Council, Devon County Council, Developer	Project is referenced in LP Strategy 26. Policy TC8 protects route from future development. Sidford employment allocation should contribute a section.
Sidmouth	Transport	Park and Change facility close to A3052 and existing bus routes	£1,000,000	£0. CIL, DCC (P)	£1,000,000	2017 - 2031	EDDC, Devon County Council, Developer	Project is referenced in LP para 14.3 (h).

Local Priority: projects identified through consultation responses from town and parish councils on the IDP and Planning Obligations SPD; and Neighbourhood Plans that have been 'Made'

Location	Project / Comment
Axminster TC	<ul style="list-style-type: none"> Consider additional car/cycle parking to serve Axminster Railway Station, accessed from Trafalgar Square with a pedestrian link to the station itself.
Bishops Clyst Neighbourhood Plan	<ul style="list-style-type: none"> Proposals to improve and extend existing national and local cycle routes and facilities with particular reference to routes between Clyst St Mary and Clyst St George, Topsham and the Exe Estuary Trail will be supported.
Branscombe PC	<ul style="list-style-type: none"> Suggest inclusion of regeneration of children's play area, tennis court and recreation field.
Broadclyst PC	<ul style="list-style-type: none"> Should review Crannaford Crossing alternative to close the road and build a pedestrian/cycle bridge instead; Need improvements to junction of Station Rd and London Rd; Provide bridge over railway near Broadclyst/Cranbrook station; Upgrade cycleway Pinhoe-Broadclyst (could be part of CVRP delivery); Community centre/hub needed for West Clyst; New bus shelters in Blackhorse area; West End is lacking sports provision.
Chardstock Neighbourhood Plan	<ul style="list-style-type: none"> Policy CPNP 01 states that development should place minimal additional stress on the infrastructure in the parish, particularly roads and drainage.
Cranbrook TC	<ul style="list-style-type: none"> Improve junction of Station Rd and London Rd Bridge over railway line
East Budleigh and Bicton Neighbourhood Plan	<ul style="list-style-type: none"> Policy N4 supports the provision of a green wildlife corridor in the village.
Lympstone PC	<ul style="list-style-type: none"> The provision of an off-road section of the Exe Estuary Trail, through Lympstone should be included as a Priority 1 scheme to meet road safety needs and to meet commuter targets for the Exe Estuary Trail which are currently well below DCC aims.
Lympstone Neighbourhood Plan	<ul style="list-style-type: none"> The Parish Council will support Section 106/CIL funding being made available for robust and objective improvements to crossing places, off-road footpaths and bridle ways, specifically footpaths linking Dinan Way to Hulham Road and a bridle way parallel to Hulham Road from the Exe View junction up to The Common. Seek additional car parking capacity in the village centre. Follow up approach from EDDC to take over the operation of the Underhill Car Park. Examine its viability and potential to improve its effective use. Work with DCC to provide better traffic management on The Strand, Cox's Hill and at Sowden End. Establish a footpath between Jackson Meadow and the village (near to the church). Explore the practicality of and pursue the development of a footpath from Dinan Way to Kings Garden Centre, and a bridle way adjacent to Hulham Road. In line with sustainable transport policy, include a cycle way/bridle way alongside the new road (Dinan Way). Retain and develop Lympstone@play and Lympstone Youth Club. Provision of a new Football/Cricket field with attendant facilities.

Newton Poppleford and Harford	Leisure facilities, improvements to footpaths and traffic management measures to improve safety on School Lane and Four Elms Hill should be included in the list of CIL projects.
Ottery St Mary	<ul style="list-style-type: none"> • Enhancement of the towns riverside area i.e. riverside walk from Tumbling Weir to Millenium Green; • Provide at least one additional car park for approximately 80-100 vehicles; • Improve Street Scene: e.g. signage,street furniture, plantings; • Re-site Town Centre bus stops and provide bus station with shelter and seating; • Enhance the Town Square and deal with Traffic Hot-spots and provide safer pedestrian access.
Sid Valley NP Steering Group	<ul style="list-style-type: none"> • New access road into the Alexandria Road estate should be Priority 1; • "Park and Change facility" - where will this be sited?; • Add project associated with better management of road space in the town; • Add project associated with the provision of a mixed use redevelopment of the East End site; • Add reference to a project related to a Sidmouth to Sidbury cycle route.
Sidmouth TC	<ul style="list-style-type: none"> • Alma Bridge, which is a vital link for the east of the town, should be included in the plan. The future of the link and associated pathways and access infrastructure should be recognised formally within the document. • The Beach Management Plan and an associated boat jetty/pier should be included in the plan. The BMP and resulting protection scheme will be the largest single piece of infrastructure in the Sidmouth area and should be at the very least noted within the plan. The Council's wish to see a boat jetty/pier for the enhancement of day trips and the associated benefits to tourism should be mentioned. • The need for updated/renewed Youth Facilities should be included as the existing Youth Centre is outdated and in need of renewal. • The Sidmouth to Feniton (Sidmouth Junction) cycle track is fully supported by the Town Council and should be a higher priority. It will encourage more cycling tourism and healthy activity for residents and visitors. More detail on how the proposed route will be reopened together with an expected delivery timetable should be included. • Redevelopment at Port Royal should be made a higher priority and recognise the existing work of both Councils to achieve this important improvement to this area of the town. • Although a Park and Change facility is mentioned it included no detail. Parking and traffic management in general should be given high priority as a vital part of the infrastructure for a tourism based economy. • The Council suggests that the improvement of buildings at Sidmouth College should be a higher priority than increasing capacity.
Stockland Neighbourhood Plan	<ul style="list-style-type: none"> • Support improving facilities are Primary Academy, where need is proven and no adverse impacts.
Yarcombe Neighbourhood Plan	<ul style="list-style-type: none"> • No specific infrastructure projects identified.

Projects removed from IDP 2015

Location	Item Type	Infrastructure Need	Cost (£)	Potential Funding Source	Funding Gap (£)	Timescale	Change and reason
PRIORITY 1							
Cranbrook Phase 1 and Expansion	Education, Children/ Young People	Education Campus – creating a minimum 525 place secondary and a second 420 place primary school (plus early years including 2 year olds)	£14,000,000	S106, Loan (Part of £14m for Primary and Secondary provision)	£ -	2015	Remove as project delivered.
East Devon	Environment and Green Infrastructure	Habitat Regulations - Cross Site Measures for Delivery Officer (5 year post)	£213,500	s106 (until CIL is adopted), CIL	£213,500	2015 - 2031	Remove as does not fall within definition of infrastructure - relates to an Officer
East Devon	Environment and Green Infrastructure	European Site Mitigation Strategy – Cross site measures	£459,167	CIL	£459,167	2015-2031	Remove as the three items that constitute these measures (delivery officer, two wardens, dog walking project) are not "infrastructure".
Exmouth	Environment and Green Infrastructure	Exe Estuary Mitigation - Modification of slipway at Mamhead to encourage users not to enter the estuary	£7,500				Remove as Mamhead slipway improvements have been delivered.
Feniton	Education	Primary education facilities	£1,250,000	Various S.106	£845,915	2015-2026	Remove as capacity issues now to be addressed through relocation of Tipton primary school.
Cranbrook Phase 1 and Expansion	Transport	Train Station and Car Park and associated access, flood mitigation and landscaping works	£4,500,000	s106 (£3m) S106 (signed), £1.5m to be funded from DCC LTP3 / LPSA	£ -	2015-2016	Remove as project delivered.
Cranbrook Phase 1 and Expansion	Transport	M5 Junction 30 Improvements (Southbound off slip widening) to provide congestion reduction benefits	£900,000	Highway Agency (£900,000 from Pinchpoint Programme)	£ -	Complete	Remove as project delivered.

Location	Item Type	Infrastructure Need	Cost (£)	Potential Funding Source	Funding Gap (£)	Timescale	Change and reason
Cranbrook Phase 1	Transport	New bus service (service 4) - for Cranbrook, Skypark, Science Park and Exeter City Centre.	£1,650,000	S106 (Schedule 5) - Year 1)£250k 2)£350k 3)£300k 4)£300k 5)£200k 6)£250k	£0	2012 -2018 Contributions start from occupation of 50th dwelling	Remove as project delivered.
Honiton	Transport	Improvement of Turks Head Junction	£565,000	S106 agreed for £224,000, balance of £341,000 from LTP	£ -	-	Remove as project delivered.
West End - Other	Transport	Improvements to B3184 from A30 junction to airport, supporting expansion of the airport and Exeter Airport Business Park	£1,400,000	Fully funded by RGF	£ -	Complete	Remove as project delivered.
West End - Pinhoe	Transport	Exhibition Way Link Road to help minimise vehicular impacts at double mini roundabouts and other constrained local routes (Harrington Lane / Chancel Lane) and also improve local bus access	£2,000,000	Developers (£1.5m already secured from ECC developments at Ibstock / Quarry) LTP of 500,000	£0	2016 - 2021	Remove. The scheme is unlikely given the outcome of the Village Green application.
West End - Redhayes	Transport	Phase 3 Link Road – Part 1 - Cumberland Way to Tithebarn Bridge. This is anticipated to cost £3.6m and is likely to be part funded through Local Pinch Point funding and Regional Growth Fund. Part 2: Tithebarn bridge to Blackhorse.	£9,100,000	Local Pinchpoint Fund of £1.758m, RGF of £1.798m, s106 - Redhayes (£2.5m), Cranbrook (£1.75m), , Science Park (£1.055m) and Mosshayne anticipated (£1.5m). HGF funding up to £4.5 million confirmed. Otherwise, balance by LTP	£0		Remove Part 1 as completed in 2015, and Part 2 under construction
Ottery St Mary	Energy, Utilities and Waste	Measures to Increase sewerage capacity. Upgrade of Fluxton sewerage works to cater for an additional 300 homes	£192,000	SWW	£0	2015-2031	Remove as additional capacity provided by SWW through its capital works programme.

Location	Item Type	Infrastructure Need	Cost (£)	Potential Funding Source	Funding Gap (£)	Timescale	Change and reason
Cranbrook Phase 1 and Expansion	Energy, Utilities and Waste	Foul sewer connections to public sewer systems	No Data Available	South West Water	<i>No Data Available</i>	2015-2031	Remove as SWW state no outstanding foul drainage requirements at Cranbrook.
PRIORITY 2							
Cranbrook Phase 1 and Expansion	Commercial	Town and Neighbourhood Centre Retail facilities	<i>Not known</i>	s106 (Schedule 24)	<i>Not known</i>	2015 onwards	Remove as does not fall within the scope of the IDP (see NPPF, para 162)
Cranbrook Phase 1 and Expansion	Commercial	Business Ladder approach	£3,023,400	s106 (until CIL is adopted), CIL, HCA (recycled funds)	£3,023,400	2015-2031	Remove as does not fall within the scope of the IDP (see NPPF, para 162)
Cranbrook Phase 1 and Expansion	Commercial	Local Centres - expansion areas	<i>Not Known</i>	S106, CIL, Investment Company	<i>Not Known</i>	2021-2031	Remove as does not fall within the scope of the IDP (see NPPF, para 162)
Budleigh Salterton	Education, Children/ Young People	Primary education facilities - expansion of St Peters Cof E school will be required within the plan period.	£460,000	£210,000 s106 and remainder from Diocese of Exeter	£0	2015	Remove as project delivered.
Cranbrook Phase 1 and Expansion	Environment and Green Infrastructure	Cranbrook Country Park Expansion	£1,000,000	£0	£1,000,000	2021 to 2031	Remove as no longer appropriate.
Cranbrook Phase 1 and Expansion	Health	Primary Medical Care Services - The NHS has not decided whether this new facility would replace the provision at the Younghayes centre or that there may be a requirement for both. The NHS has a preference to utilise part of the 1.3 Ha site already agreed for the health and wellbeing complex. They have identified floorspace for primary care facilities of 1,104 sqm GIA for Cranbrook up to 7500	£2,296,320	s106, NHS, CIL	£2,296,320	2018-2021	Remove as CCG do not consider that it is required, as primary care will be delivered through the health and well being hub.

Location	Item Type	Infrastructure Need	Cost (£)	Potential Funding Source	Funding Gap (£)	Timescale	Change and reason
		new dwellings. Currently the Younghayes Centre has 167 sqm of space for primary care facilities.					
Cranbrook Phase 1 and Expansion	Public Service	Street Scene compound	No Data Available	s.106	No Data Available	2015-2017	Delete as removed from s.106.
Cranbrook Phase 1 and Expansion	Transport	Improvements to Station Road (Broadclyst) - Calming measures to reduce speeds and offer children a safe route to school between B3181 and Clyst Vale Community College is being delivered using Investing in Devon funding and part S106. Alternative quiet lane &/or off-road cycle routes through National Trust land are being investigated to improve wider walking/cycling linkages with Cranbrook and the Clyst Valley Way proposals.	£700,000	s106 (Skypark £50k, Cranbrook £140k), Invest in Devon (£128K), CIL	£500,000	Wider linkages 2018-2024	Safer Route to School delivered 2015. The remaining elements are better linked to the Clyst Valley Way, part of the Clyst Valley Regional Park, and S278
Exmouth	Transport	Public transport interchange improvements - including improved walking and cycling links to the town centre, revised entrance to train station and rationalisation of bus station facility included as part of this work. This scheme does not include the new/replacement depot facility but is dependent upon it.	£2,000,000	Network Rail, Train Operating Company, Stagecoach, DCC, EDDC. Network rail anticipated to provide £500,000 towards station building enhancements S106 £30,000 (13/0494/MFUL),	£0		Revision to Station entrance and Marine Way completed. NSIP station works on site in 2016. Further changes through Masterplan work

Location	Item Type	Infrastructure Need	Cost (£)	Potential Funding Source	Funding Gap (£)	Timescale	Change and reason
Exmouth	Transport	Junction improvements, including; Littleham cross junction; Modifications to Imperial Road/The Royal Avenue Junction and; Marine Way and Imperial Road.	£1,000,000	s106, CIL, DCC (P)	£1,000,000	2021-2031	Remove as improvements no longer being sought from Plumb Park development (Littleham cross junction), and lack of evidence for other schemes.
West End - Other	Transport	Rail head to enable multi modal freight transfer. This infrastructure is relevant on a Grip 4 Study first being completed.	£5,000,000	Delivered by Exeter Gateway Developer (>50,000 sq m) / External grants, s.106	£5,000,000	2015-2026	Remove as not currently being pursued.
West End - Pinhoe	Transport	Pinhoe Village enhancements, to provide an enhanced public realm / pedestrian environment to promote sustainable travel & mitigate traffic impacts at the double mini roundabouts (in safety and capacity terms)	£500,000	Developers (Pinn Court / Old Park Fm), s106/S278	£0	2016-2018. Designs agreed, expected to commence in 2016/17	Remove as under construction.
PRIORITY 3							
Axminster	Commercial	Cloakham Lawn, Work hub - managed workspace facility	£1,500,000	TBC	£1,500,000	2015-2018	Remove as does not fall within the scope of the IDP (see NPPF, para 162)
Seaton	Commercial	Enhanced and increased provision of workspace for small to medium size businesses at Colyford Road and Harepath Road (Fosseway Site)	£2,500,000	TBC	£400,000	2015-2017	Remove as does not fall within the scope of the IDP (see NPPF, para 162)
Ottery St Mary	Public Service	Replacement library to be co-located with other services; existing library has poor access. Approx 330spm required.	£1,000,000	CIL, DCC	£1,000,000	2015-2031	Remove as project is underway and nearing completion.
Cranbrook - Expansion Areas	Environment and Green Infrastructure	Outdoor Field Classroom	£100,000	£0; s.106, CIL (P)	£100,000	2021-2031	Remove as can be incorporated within Country Park Resource Centre.

Location	Item Type	Infrastructure Need	Cost (£)	Potential Funding Source	Funding Gap (£)	Timescale	Change and reason
Cranbrook - approved development and Expansion Areas	Environment and Green Infrastructure	Country Park Car Park	£40,000	£0; s.106, CIL (P)	£40,000	2021-2031	Remove as located near town centre where car parking will be available; and to promote walking and cycling.
Cranbrook Phase 1 and Expansion	Environment and Green Infrastructure	Education Ranger for the Country Park - The existing s106 agreement for 3500 dwellings provides for the Country Park Officer post (£20,000 for five years) and the expectation would be to secure an education ranger through the future 4000 application.	£100,000	£0	£100,000	2021-2031	Remove as does not fall within definition of infrastructure - relates to an Officer
Axminster	Health	Health Centre	£1,008,800	£0	£1,008,800	2017 - 2026	Remove as project delivered.
Cranbrook Phase 1 and Expansion	Public Service	Theatre - The provision of a theatre is to provide a community facility that encompasses use by primary and secondary schools as well as community groups.	<i>Not known</i>	S.106, CIL, Arts Council	<i>Not known</i>	2026-2027	Remove as replaced with multi-functional cultural space
Cranbrook Phase 1 and Expansion	Public Service	Cinema - The provision of a cinema is to provide a community facility for the town centre.	<i>Not known</i>	S.106, CIL, Commercial provider	<i>Not known</i>	2026-2027	Remove as replaced with multi-functional cultural space
Exmouth	Public Service	Contribution to Marine Youth facilities at Camperdown (Services and access as part of Estuaryside Transformation project)	£800,000		£800,000	2015- 2017	Remove as project delivered.
West End - Other	Other	New Royal Mail Delivery Office. Requirement for an office of c.937 sqm on a site of 0.6 Ha	£1,920,000	Royal Mail (internal capital expenditure),	£1,920,000	Required between 2500 & 5000 new delivery points being in place across the two LA's	Remove as does not fall within the scope of the IDP (see NPPF, para 162)

Location	Item Type	Infrastructure Need	Cost (£)	Potential Funding Source	Funding Gap (£)	Timescale	Change and reason
Axminster	Public Realm	Town Centre enhancement - establishment of masterplan	£100,000		£70,000	2014-2015	Remove as does not fall within the scope of the IDP as it relates to drafting a masterplan.
Sidmouth	Public Realm	Port Royal - Masterplan	£600,000		£600,000	2015-2017	Remove as does not fall within the scope of the IDP as it relates to drafting a masterplan.
Exmouth	Public Realm	Magnolia Centre Enhancement - public realm enhancements and a more permeable high quality town centre	£1,000,000	£0	£1,000,000	2016-2018	Remove as it does not fall within the scope of the IDP as it relates to a regeneration project, rather than an infrastructure project.
Seaton	Public Realm	Public realm enhancement between LSE1/ Regeneration site, the town centre and Axe Wetlands Nature Reserve	£1,200,000	£0	£1,200,000	2016-2018	Remove as it does not fall within the scope of the IDP as it relates to a regeneration project, rather than an infrastructure project.
Exmouth	Sport, Recreation and Culture	Swimming Pool - Changing 'village' for modern use	£1,500,000	£0	£1,500,000	Phase 2 (2017/18?) after phase 1	Remove as project completed in March 2017.
Exmouth	Sport, Recreation and Culture	Redevelop Leisure Centre To incorporate 60 station gym to accommodate additional 800 members; incorporate children's play, spa, cafe and new changing facilities.	£4,500,000		£3,000,000		Remove as project delivered.
Exmouth	Sport, Recreation and Culture	Rolle College Playing Fields - to include improved sporting facilities and new pitches in the town (related to Estuaryside Transformation Project)	£1,000,000	TBC	£1,000,000	2016-2018	Remove as planning permission has been granted for partial development of the site for housing, which includes retaining and enhancing the rest of the site as playing fields.

Location	Item Type	Infrastructure Need	Cost (£)	Potential Funding Source	Funding Gap (£)	Timescale	Change and reason
Exmouth	Sport, Recreation and Culture	Exmouth Pavilion refurbishment	£400,000	TBC	£400,000	2016-2018	Remove as project delivered.
Exmouth	Sport, Recreation and Culture	Mamhead slipway replacement. This scheme should include modifications noted in the Exe estuary mitigation section	£1,000,000	£0	£1,000,000	2014-2015	Remove as project delivered.
Exmouth	Sport, Recreation and Culture	Orcombe Point Hub - Facilitate the delivery of a café on the small platform on the walkway	£50,000	TBC	£0	TBC	Remove as it does not fall within the scope of the IDP as it relates to a regeneration project, rather than an infrastructure project.
Honiton	Sport, Recreation and Culture	Extended Gym to meet existing latent demand in Honiton + short term Cranbrook demand. Also improve parking. Cost can be met or supplemented by commercial funding from LED/private sector	£250,000	LED/commercial funding plus possible S106/CIL/Prudential Borrowing to reduce overall annual revenue cost of leisure	£250,000	2014-2015 or during early Cranbrook growth phase	Remove as project delivered, although more car parking spaces are required to meet growing demand.
Honiton	Sport, Recreation and Culture	Improved parking, access, changing and spectating.	£1,000,000	£0	£1,000,000		Remove as superseded by Honiton Sports Pitch Strategy and PPS.
Honiton	Sport, Recreation and Culture	Install new cricket training nets at Mountbatten Park, Honiton	£35,000	£35,000	£0	2016	Remove as project delivered.
Seaton	Sport, Recreation and Culture	New Fitness Gym and Studios in Seaton Town -	£750,000	LED/commercial funding plus possible S106/CIL/Prudential Borrowing to reduce overall annual revenue cost of leisure	£750,000	2015-2020	Remove as project delivered.
Sidmouth	Sport, Recreation and Culture	Installation of rabbit proof fencing at Byes Lane rugby pitches	Unknown	£0	Unknown	2015	Remove as project delivered.
Honiton	Transport	Upgrade of Ottery Moor Lane, from its junction with the High Street	Not known	£0. s.106/278, DCC (P)	Not known	2017-2019	Lack of justification.

