

## Agenda for Strategic Planning Committee Tuesday, 26th March, 2019, 10.00 am

### Members of Strategic Planning Committee

Councillors: P Diviani (Chairman), M Allen (Vice-Chairman),  
S Bond, M Booth, C Brown, J Elson, G Godbeer, I Hall, M Howe,  
G Jung, R Longhurst, G Pook, E Rylance, P Skinner and  
M Williamson

**Venue:** Council Chamber Blackdown House

**Contact:** Wendy Harris;

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(or group number 01395 517546)

Friday, 15 March 2019



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#### 1 Public speaking

Information on [public speaking](#) is available online

#### 2 Minutes of the previous meeting (Pages 3 - 6)

#### 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

Information on [matters of urgency](#) is available online

#### 6 Confidential/exempt item(s)

To agree any items to be dealt with after the public (including the Press) have  
been excluded. There are no items which officers recommend should be dealt  
with in this way.

#### 7 Heritage Strategy (Pages 7 - 21)

#### 8 East Devon and Blackdown Hills Landscape Character Assessment (Pages 22 - 143)

#### 9 Action Plan for Production of a Revised East Devon Playing Pitch Strategy (Pages 144 - 155)

#### 10 Custom and Self-build Housing (Pages 156 - 161)

#### 11 Draft Affordable Housing Supplementary Planning Document (Pages 162 - 238)

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[Decision making and equalities](#)

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**EAST DEVON DISTRICT COUNCIL****Minutes of the meeting of Strategic Planning Committee held at Council Chamber Blackdown House on 20 February 2019****Attendance list at end of document**

The meeting started at 10.00 am and ended at 12.10 pm

**44 Public speaking**

Four members of the public commented on item 47, as follows:

Jeremy Wollen, speaking as a member of the public, raised concerns that the Cranbrook expansion was still included on Green Wedge surrounding Rockbeare which was contrary to the Rockbeare Neighbourhood Plan and to Strategy 12 of the Local Plan. Mr Wollen also raised concerns about the proposed expansion and said it would create unsafe areas with no benefit to Cranbrook. Mr Wollen advised his views were supported by Cranbrook Town Council.

Paul Smith, speaking as a resident of Cranbrook, asked why East Devon District Council's Planning Department had favoured their own plan which mirrored the Consortium's outline planning application submitted in 2015. He also asked why the planning officers considered it acceptable to misrepresent the number of dwellings proposed to influence the vote made by members to remove the Green Wedge development from the document. Mr Smith raised concerns about the final draft document and said it was insufficiently detailed to permit diligent scrutiny of the planning proposal which would be necessary for consideration by Full Council.

Nick Freer, speaking on behalf of the East Devon Community Partnership, made reference to the second recommendation of agenda item no. 6 and raised concerns if the Development Plan Document was forwarded to the Inspectorate without first addressing the consultation responses. Mr Freer said East Devon District Council would need to demonstrate that the consultation had taken place and that the responses had been taken into account. Mr Freer said the Consortium would like to work with East Devon District Council on the viability issues to avoid any disagreement at the examination stage to avoid a delay. Mr Freer said he did not want the Development Plan Document to be submitted to the Inspectorate without the Consortium's comments. Mr Freer asked members to reconsider recommendation no. 2 and asked for the Development Plan Document to come back to the Strategic Planning Committee before it is submitted to the Secretary of State.

Barry James speaking on behalf of the Consortium, shared Mr Freer's concerns and said the Development Plan Document had been rushed with no time to fully assess the documentation. Mr James said he would endorse the request to members to allow further scrutiny of the document.

**45 Minutes of the previous meeting**

The minutes of the Strategic Planning Committee meeting held on 29 January 2019 were confirmed and signed as a true record.

**46 Declarations of interest**

Councillor Geoff Pook – minute 49 – Personal interest – involved in the construction industry.

Councillor Eleanor Rylance – minute 49 – Personal interest – Ward member for Broadclyst Parish Council.

Councillor Geoff Pook – minute 50 – Personal interest – Chairman of a Community Land Trust

## 47 **Cranbrook Plan Development Plan Document**

The Chief Executive addressed the issues raised by the Consortium and East Devon Community Partnership and asked members to consider two amendments to the recommendations. Recommendation 2 to include 'subject to any necessary changes arising from consultation being approved by the Strategic Planning Committee' and recommendation 4 to replace 'prior to consultation' with 'up to the point of submission'.

The Service Lead, Planning Strategy and Development Management addressed the points raised by the Consortium and Persimmon Homes and acknowledged East Devon District Council had worked with the Consortium and Persimmon Homes throughout the process and in the development of policies in the Cranbrook Plan. He addressed the issues that had resulted from the late arrival of the viability work. The Service Lead, Planning Strategy and Development Management advised the consultation process would be part of the ongoing engagement with the Consortium and any concerns would be considered and addressed as appropriate.

The Cranbrook New Community Manager presented the report, which related to the publication of the proposed submission version of the Cranbrook Plan Development Plan Document and sought Member endorsement for consultation and recommendation to Full Council for submission to the Planning Inspectorate to allow the production of a Development Plan Document to guide the expansion of Cranbrook.

The Service Lead, Planning Strategy and Development Management addressed the confusion surrounding development in the Green Wedge and advised the Cranbrook Plan DPD does not propose any development in the Rockbeare Green Wedge area the subject of policy Rock06 of the Rockbeare Neighbourhood Plan.

Members raised the following points during discussion of the Cranbrook Plan Development Plan Document:

- Concerns about how the approach taken would influence other Green Wedge areas. Members were advised that the proposed incursion into the Green Wedge in Clyst Honiton incorporated into the plan is considered to be in accordance with the Local Plan as it does not undermine the purpose of the Green Wedge. It was also noted that to date Clyst Honiton Parish Council had not raised concerns with this proposal;
- Clarification was sought about additional schools including a secondary school and special needs school. In response members were advised the plan included an infrastructure contribution of £1million and East Devon District Council were meeting the requirements set by Devon County Council's Education Infrastructure Plan;
- The lack of community centres. One community centre will be funded for its construction costs and other sites have been permitted;
- Clarification was sought about meeting the needs of health care provision. In response members were advised there were plans for a Health and Wellbeing



Hub to serve Cranbrook and a contribution of £8.7million would be made towards the full cost of the delivery of the hub;

- Clarification was sought about Green Wedges. Members were referred to Strategy 8 of the Local Plan;
- Issues with affordable housing delivery and CIL contributions;
- Members sought clarification on the application of Strategy 36 – Accessible and Adaptable Homes and Care/Extra Care Homes. Members were advised that Strategy 36 would be applicable at Cranbrook but it was not possible to put in place a stronger policy or amend Strategy 36 as sufficient evidence did not currently exist of the needs for such housing at Cranbrook. Officers committed to gathering the necessary evidence and addressing Members concerns through the new Local Plan;

**RESOLVED:**

1. That the Cranbrook Plan Development Plan Document consultation as detailed in this report and in accordance with the adopted Statement of Community Involvement be approved.
2. That the position in terms of the current planning applications for the expansion of the town be noted.
3. Delegated powers to the Service Lead, Planning Strategy and Development Management in consultation with the Chairman of the Strategic Planning Committee to make minor changes and address any typos and other errors to the document up to point of submission be approved. These to include additional wording to clarify the application of Strategy 36 at Cranbrook.

**RECOMMENDED TO COUNCIL:**

1. The Cranbrook Plan Development Plan Document for submission to the Planning Inspectorate for Examination in Public (subject to any necessary changes arising from consultation being approved by the Strategic Planning Committee).

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**Community Infrastructure Levy Preliminary Draft Charging Schedule**

The Service Lead, Planning Strategy and Development Management presented the Community Infrastructure Levy (CIL) and Preliminary Draft Charging Schedule to set out the context and to highlight the key findings from the viability evidence. The report highlighted the current Charging Schedule which contained three different charging zones for residential development and the revised Charging Schedule. Members' attention was also drawn to the proposed new instalments policy which had been designed to strike a better balance between spreading the burden of CIL payments over the build out of developments to aid development viability against the administrative burden on the Council.

Discussion covered:

- Concerns about how infrastructure would be delivered for Sheltered Housing;
- Clarification was sought about land being reduced to pay for CIL. Members were advised that in concept this was correct but reference was made to the restricted availability of good development land in the district and the high aspirations of land owners when it comes to values;
- Concerns about affordable housing viability;
- Concerns about leading retirement home developers making bigger profits if they are not required to pay CIL;

- Some members highlighted the need to ensure houses built in Cranbrook were sustainable for the future;

**RESOLVED:**

1. That the findings of the CIL Review and Cranbrook DPD Viability Report be noted.
2. That the Community Infrastructure Levy Preliminary Draft Charging Schedule be approved for public consultation over a period of four weeks.

**Attendance List**

**Councillors present:**

P Diviani (Chairman)  
M Allen (Vice-Chairman)  
S Bond  
C Brown  
J Elson  
G Godbeer  
G Jung  
G Pook  
E Rylance  
P Skinner

**Councillors also present (for some or all the meeting)**

D Barratt  
P Faithfull  
R Giles  
A Moulding  
H Parr

**Officers in attendance:**

Ed Freeman, Service Lead Strategic Planning and Development Management  
Mark Williams, Chief Executive  
Shirley Shaw, Planning Barrister  
Thea Billeter, Cranbrook New Community Manager  
Wendy Harris, Democratic Services Officer

**Councillor apologies:**

M Booth  
I Hall  
M Howe  
R Longhurst  
M Williamson

Chairman .....

Date: .....



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

**Date of Meeting:** 26 March 2019

**Public Document:** Yes

**Exemption:** None

**Review date for release** .

**Agenda item:** 7

**Subject:** **Heritage Strategy**

**Purpose of report:** To advise Members on the outcome of the public consultation on the Heritage Strategy and propose that it be adopted.

**Recommendation:**

1. The East Devon Heritage Strategy 2019 -2031 be adopted subject to amendments arising from the consultation as set out in this report.
2. That a pilot scheme for a Conservation Area review involving the community as described in the Heritage Strategy be agreed for East Budleigh including the Otter Valley Association.

**Reason for recommendation:** To gain formal approval for the amended Heritage Strategy 2019 – 2031 and to gain approval for a pilot scheme involving the community at East Budleigh.

**Officer:** Jacqui Best, Planning Policy Officer.

JBest @eastdevon.gov.uk; 01395 517483

**Financial implications:** The Heritage Strategy envisages utilisation of existing staff resources. As such, there are no specific financial implications

**Legal implications:** This strategy is not a local plan document but does set out the aspirational roadmap and is a central reference point for the conservation and enjoyment of the district's historic environment and identified heritage assets. The legal implications are set out within the report and strategy.

**Equalities impact:** Low Impact

**Risk:** Low Risk

The publication of a heritage strategy will help to protect, manage and enhance our historic environment and heritage assets, whilst encouraging social, economic and environmental benefits.

**Links to background information:** Consultation details  
<http://eastdevon.gov.uk/planning/planning-policy/heritage-strategy-and-draft-local-list/heritage-strategy/>

**Link to Council Plan:** Delivering and promoting our outstanding environment

## 1. Introduction

- 1.1. Members will recall that they agreed to a public consultation on the draft Heritage Strategy on 27<sup>th</sup> November 2018, for 8 weeks from 28<sup>th</sup> November 2018 in accordance with the adopted Statement of Community Involvement. The draft Heritage Strategy (2019 – 2031) brings together information on the heritage of East Devon and identifies the issues, challenges and opportunities for the future with a plan of recommended actions.
- 1.2. The consultation was publicised with a press release and on the East Devon DC website, whilst a wide range of statutory consultees, voluntary bodies, local history and amenity groups, Parish Councils, neighbourhood planning groups, adjoining authorities, agents and businesses who expressed an interest were contacted directly. There was a good response with 34 responses that are recorded, from statutory consultees, local history and amenity groups, neighbourhood planning groups, town and parish councils and two from individuals.
- 1.3. Following the consultation, and in accordance with paragraphs 3.1 and 3.4 of the draft strategy which recommended that a more detailed action plan was produced to incorporate feedback, a more detailed action plan has been agreed. The 12 year action plan presented in the last committee report has been updated and is presented within the revised document at Section 3 (after para.3.25), to include more detailed timescales and monitoring information where possible.
- 1.4. The draft Heritage Strategy was produced by the planning policy team in consultation with the conservation team and specialist organisations in the early stages. In particular Devon County Council, Historic England and the East Devon AONB at an earlier stage provided much valuable advice and information and offered congratulations on this being a comprehensive strategy.
- 1.5. Historic England has more recently offered the authority their “congratulations on the preparation of such a strategy and endorse it as an impressive example of its type and one of only a handful which exist in the south west.”

## 2. Responses to the consultation and amendments to document

- 2.1. The vast majority of responses were very supportive of the draft strategy, with further information provided on our heritage and many constructive comments and suggestions. The consultation suggested 12 questions to consider covering the whole document and responses were mainly structured around those questions. All comments have been considered in detail and the draft strategy amended where appropriate.
- 2.2. **Table 1** to this report summarises the issues raised and the proposed changes to the Heritage Strategy, structured by the 12 questions. Comments submitted are summarised as many are lengthy, however full comments are published on the Council website [here](#).
- 2.3. The draft Heritage Strategy with amendments can be viewed on the Council website, as well as the final version. Amendments to the document are highlighted in red, however amendments that constitute minor editing and formatting are not marked up, for ease of reading.

### 3. Summary of responses

**General:** The vast majority of respondents found the document clear and easy to read, well written, well-structured and agreed with the aims.

#### **Theme A: Understanding and appreciating our historic environment**

Respondents are generally happy with a description of our historic environment and heritage assets, but with one wanting much more information on the history of the district, one much less and others considering it a balanced approach.

#### **Theme B: Positively managing our historic environment**

The majority of comments relate to the local list guide being strongly supported and welcomed, as well as the engagement of local communities. There were many suggestions relating to the engagement of museums, schools and other educational establishments. Suggestions were also made in relation to prevention of heritage at risk and other specific management duties.

#### **Theme C: Enhancing and benefitting from our heritage**

This section was much welcomed by all apart from one respondent who found it unnecessary. The role of museums and schools in engaging with local people was again highlighted. A number of organisations would like to become partners, including the National Trust, the Jurassic Coast Trust, Devon and Cornwall Police and the Devon Gardens Trust.

**Action Plan:** There was much agreement on the action plan actions, but a request for more detail especially on timing and monitoring. It was set out in the draft document that a more detailed action plan would be provided following the public consultation. This 12 year action plan is presented within the amended draft Heritage Strategy and as **Table 2** to this report.

As the first heritage strategy for East Devon, many of the actions relate to setting up systems and developing programmes, but the action plan also includes broad estimates for the delivery of these programmes over the 12 years. It must also be appreciated that there are many variables which may affect the long term action plan including Brexit, changes to funding providers and training availability, staff resources and government structures and it is not possible or appropriate to give exact timings for the delivery of programmes in this document. Any pilot schemes will be monitored in detail which will help in the programming of future projects.

### 4. Recommendations

- 4.1 That the draft Heritage Strategy is adopted subject to amendments as set out in Table 1.
- 4.2 That a pilot scheme is agreed for East Budleigh involving the community, including the Otter Valley Association, within the East Budleigh with Bicton Neighbourhood Plan area. Research by the planning policy team, in consultation with the conservation team, has been carried out to assess a suitable scheme for a pilot study. This is to involve a community group in a Conservation Area review, including a Grade II Listed Buildings survey and establishing a local list of undesignated assets. The criteria used for this included:

- The presence of an active specialist amenity / historic group, in particular where items for a local list have been submitted
- A neighbourhood planning group, especially where there is a made neighbourhood plan.
- A compact Conservation Area suitable for review and possible Grade II condition survey
- A Built up Area Boundary (BUAB) of a manageable size including items proposed as undesignated heritage assets for a local list.

Two associations have submitted work prepared for local lists, firstly the Otter Valley Association and following this the Sid Vale Association, completed in 2015 /16. The work submitted by the Otter Valley Association has followed a particularly robust procedure which included:

- Creation of a team and training of local volunteers
- Research including engagement with specialists
- Public consultation including local exhibitions and engaging with owners
- A comprehensive survey of items for local listing, each assessed using Historic England criteria and categorised and documented into areas of interest
- The mapping of proposed undesignated assets and publication on the Association's website

East Budleigh is proposed as a pilot scheme as it meets all of the criteria outlined above, including a compact Conservation Area and BUAB. The scheme, if approved, will be monitored in detail which will inform development of a programme extended to other areas.

<b>TABLE 1</b>		
<b>Consultation Question</b>	<b>Feedback summary:</b>	<b>Response to Feedback:</b>
<b><i>Q1 Are you happy with the design and layout of the strategy? Is it clear and easy to read or do you or have any suggestions for improvement?</i></b>	<p>The majority (14 of 17 responses on this question) found the strategy clear and easy to read, balanced and well drafted with many further complimentary comments and congratulations on this being a comprehensive document.</p> <p>Two suggestions were made that the text be shortened, and one to take out repeat of undesignated assets (now 2.49 and 2.88).</p> <p>Another suggested that signposting may help readers with limited time to focus sections to concentrate on.</p> <p>One requested a clear statement of the strategy and longer term strategy, whilst another thought that information was confused with strategy.</p> <p>A bigger map / maps were suggested.</p>	<p>Ways to shorten the text have been considered and minor editing completed, including para. 2.49 explanatory text which has been taken out.</p> <p>Some repetitions are necessary, whichever way the strategy is structured as the document is intended to be 'dipped into' and does not need to be read in its entirety, to meet a range of needs and interests. The introduction, for example, introduces topics which later appear in the document more fully, and again in the summaries and action plan where they are again relevant.</p> <p>There is signposting within the text which is intended to help navigation of the document, and it has been improved further to make it clearer, for example in (paragraph 1.15). This includes formatting of the contents page, which was not possible in the draft format.</p> <p>It is felt that there is a clear statement of the strategy in both the introduction and action plan. This has been made clearer (paragraph 1.14). The provision of information is clearly part of the strategy and set out as an aim ('to widen knowledge and understanding'), and within the objectives and action plan.</p> <p>The maps can be zoomed into on-line, or printed as A3 to make bigger. Text has been added to the document to make this clearer.</p>
<b><i>Q2 Do you have any comments on the structure of the strategy, including the three themes?</i></b>	<p>The majority (7 of the 8 respondents) were happy with the structure apart from one organisation who wished to restructure the document significantly, to include deleting much information.</p> <p>Most respondents found the themes helpful but one disliked the concept of themes and suggested shorter titles.</p> <p>Another suggested putting the summaries of the 3 themes into one section.</p>	<p>Although the suggested structure may be an acceptable alternative for some, it is not considered an improvement to that existing and warranting a major rewrite, especially as most respondents are happy with the structure as it is.</p> <p>The current structure, with colour coding, is intended to appeal to a wide audience, and will be enhanced in the final document.</p> <p>Theme names were not changed as felt the suggested titles would not adequately describe their meaning and content.</p> <p>The summary objectives and actions are in the action plan: this has been made clearer (para. 1.15). The summaries could also be used together to provide a leaflet at some stage in the future.</p>

<b>Section 1 Introduction</b>	<p>The summary of organisations and policies was regarded as useful</p> <p>Request to add The Jurassic Coast Trust</p> <p>Request to add a link for the Devon Historic Environment Records (HERS)</p> <p>The role of the Lead Councillor for Design and Heritage was highlighted as important</p>	<p>Details of the Jurassic Coast Trust added (para.1.41)</p> <p>The Historic Environment Records link is already provided – but has been made more clear (para. 1.33). All links have been checked and updated where needed</p> <p>Museums, heritage centres &amp; libraries have been added as sources of information (para.1.42)</p>
<b>Q3 Do you agree with the aims of the strategy? Would you change anything, and if so why?</b>	<p>All 8 respondents to this question agreed with the aims. One suggested that the term ‘purpose’ was confusing and that the aims should be upfront in the document.</p> <p>Another wished to see more mention of supporting national policy and neighbourhood plans</p>	<p>Purpose changed to ‘aims’ as the heading.</p> <p>Aim 4 relates to supporting the local plan: this complies with national policy (NPPF) and neighbourhood plans comply with both – this has been made more explicit in a footnote (para 1.23)</p>
<b>Q4 Does this summary reflect our historic environment? Would you like to add anything?</b>	<p>Most respondents found this section informative / well balanced. However one found information provided “unnecessarily descriptive as it is already ‘understood’ and ‘appreciated’ by residents and visitors”.</p> <p>Another would like to see much more, including on map, of what is important about the heritage of the district, including the Prayer Book Rebellion and links to former and present inhabitants of the district and to its economic history.</p> <p>Suggestion that the summary should mention each class of asset</p> <p>Amendments requested by the Dorset and East Devon Coast World Heritage Site (known as the Jurassic Coast)</p>	<p>It is felt that the information included on East Devon introduces one of the strategy objectives to ‘widen knowledge of the historic environment of East Devon and its assets’, for those resident and visitors who do not already have this depth of understanding or appreciation of our heritage, and being as inclusive as possible whilst promoting our heritage assets.</p> <p>Information has been provided with input from the Devon County Council Archaeologist / Historic Environment Record team and the AONBs however there is not scope here for an in-depth analysis of the history of the district, which can be accessed better through local specialist organisations, museums and libraries.</p> <p>Text / maps have therefore been limited to heritage evidenced in our built environment and landscape but some of the suggested information offered on the built environment has been added. (para. 2.1)</p> <p>Theme A summary updated</p> <p>Amendments made on World heritage Site text (2.48) and information noted.</p>



<p><b><i>Q5 Do you have any comments on the way heritage assets are described in this theme?</i></b></p>	<p>One respondent found the approach works very well, due to the 'broad spectrum of assets that exist', whilst another thought it should be cut drastically.</p> <p>Request for parks and gardens of local interest to be added, and that the titles of 2.59 – 2.62, and 2.51 be changed.</p>	<p>As the majority of respondents found this section informative, it has not been cut.</p> <p>The suggested amendments have been changed at paragraphs 2.36 and 2.53, 2.51 and 2.61 /2.64</p>
<p><b><i>Section 2, Theme B: Positively managing our historic environment</i></b></p>	<p>Proposals for a list of undesignated assets and guide are strongly supported and welcomed, as are proposals to work with and facilitate training for communities.</p> <p>Suggestions are made for Conservation Area reviews, extension and new designations, for example at Uplyme</p> <p>Greater recognition of Design Statements is requested as is greater protection of thatch and hedgerows - and trees in Conservation Areas.</p>	<p>All comments are noted and an action relating to the designation of new Conservation Areas has been added to the action plan.</p> <p>Other specific suggestions for Conservation Areas are noted for consideration.</p> <p>These are noted for consideration. Design statements will be considered in the emerging East Devon Design Guide.</p>
<p><b><i>Q6 Do you have any thoughts on our plans to involve communities more? What may be the opportunities or challenges?</i></b></p>	<p>Proposals to involve communities are very much welcomed, including younger members. Opportunities suggested include resources through Exeter Museums and University and greater power at Parish Council level.</p> <p>The need for funding / resources to involve communities was highlighted.</p> <p>A comment was made that some smaller parishes may have vested interests which influence local listed items</p>	<p>Suggestions are welcomed and noted</p> <p>The document and action plan consider the need for funding. Discussions with external partners have been initiated and will be resumed on adoption of the strategy.</p> <p>Establishing strict criteria for assessment in the Local List guide will make the process fair for all. Consultation on the draft guide has recently been completed.</p>

<p><b>Q7 Are there any further opportunities or resources that could help us to manage the districts heritage assets, for example our heritage at risk or conservation areas?</b></p>	<p>A few respondents request greater protection of the curtilage and setting of heritage assets, and that earlier legal action is taken to prevent heritage at risk.</p> <p>Greater co-operation between the agencies to protect and conserve listed buildings is also suggested.</p> <p>The National Trust, for example, has offered help to deliver programmes such as reviewing Conservation Areas. Engagement with large landowners and estates may reveal unrecognised assets.</p>	<p>These points relate to the statutory duties of the conservation team, which are noted.</p> <p>There are actions relating to partnership development in the action plan, and partners have been added.</p> <p>Comments are otherwise welcomed and noted.</p>
<p><b>Section 2, Theme C: Enhancing and benefitting from our heritage</b></p>	<p>7 of the 8 respondents welcomed this section, especially on town centre regeneration.</p>	
<p><b>Q8 Can you suggest any more ways that our heritage benefits our economy, health and wellbeing or our environment?</b></p>	<p>Suggestions were made relating to education on the value of heritage to shape the future and on the importance of using local heritage in schools.</p> <p>It is mentioned that public footpaths, the remnants of the routes labourers use, are beneficial to wellbeing.</p> <p>A report details how the World Heritage Status of the 'Jurassic Coast' coastline influences around £100m of economic activity each year.</p>	<p>The Council has limited resources to directly engage with schools, but an action has been added to encourage local groups to engage with local schools (action 5).</p> <p>Comments welcomed and noted</p> <p>Noted – and text updated (para. 2.138)</p>

<p><b>Q9 Working with communities and partners, can you suggest any other ways that our heritage can be enhanced?</b></p>	<p>Suggestions were made to: include the role of museums libraries and schools and a network through social media.</p> <p>Also, using activities and events similar to those the countryside team use to promote heritage, and to make it easier to use buildings for a positive range of heritage uses</p>	<p>The role of museums and libraries included (para. 1.42)</p> <p>Use of social media added to action plan (action 6)</p> <p>Comments otherwise noted</p>
<p><b>Section 3: Implementation / Action Plan</b>  <b>Q10 Do you agree with the recommended actions? If not, what are your reasons?</b></p>	<p>Respondents agreed with and are in support of the actions, especially the improved web pages and heritage themed event.</p> <p>Actions were suggested relating to conservation areas, publicity for assets at risk, the use of design statements in decision making, engagement with schools, greater protection of assets in the AONB, adopting design statements and local lists, the use of early enforcement action, the use of data and GIS, and working closely with communities and partners including the World Heritage Site Plan.</p> <p>There were many requests for more detailed timeframes and monitoring to be included, which have been addressed in the 12 year action plan as planned, to follow this consultation.</p>	<p>The action plan has been updated to reflect or emphasise many of these actions where possible, or are otherwise noted.</p> <p>Some are already part of current activities, including statutory duties delivered by the conservation team and the use of databases and GIS systems within the Council and Devon County Council to record heritage assets.</p> <p>Others actions are already covered in the action plan, for example working with partners more.</p>

<p><b>Q11 Have you any suggestions for other projects, or more efficient ways that the strategy objectives could be put into action?</b></p>	<p>Suggestions included integrating heritage and landscape strategies, engaging with tourism providers to encourage awareness, wider promotion in easy to understand language, making use of local knowledge, and use of locals to help manage heritage, promotion of Heritage Open Days / Weekends</p>	<p>All suggestions are noted for consideration.</p> <p>Promotion of Heritage Weekends added to action plan as well as the East Devon AONB annual Heritage Conference</p>
<p><b>Section 4: Appendices</b>  <b>Q12 Is there anything you would like to amend or add to the appendices?</b></p>	<p>Suggestions were to:            Include details of heritage at risk in Conservation Areas</p> <p>Add list of museums and heritage centres, other partners and groups</p> <p>An update was requested on the Seaton heritage page.</p>	<p>Heritage at risk has not been added by Conservation Area in Appendix 2 as details change regularly, but this can be illustrated on the improved webpages</p> <p>The list of partners and local history and amenity organisations updated and a Link to a list of museums added</p> <p>Seaton heritage page updated.</p>

**TABLE 2: Action Plan 2019 – 2031**

**Timescales: S = Short term 2019 – 2020**

**M = Medium term 2021 – 2024**

**L = Long term 2025 – 2031**

Objectives Theme A	Actions and tasks	Stat. duty	Indicative resources	Delivery: Staff and Partners	Timescale			Notes	Indicative monitoring
					S	M	L		
<b>Enhance understanding of heritage assets and their significance</b>	Provide information and guidance in the Heritage Strategy.		Produced in-house	Policy team in consultation with conservation team and external partners	X			Most tasks completed	Monitor readership on-line
	Review Heritage Strategy		Moderate staff resources	Policy team			X	Delivery plan monitored annually	
	Provide links to further guidance through the Council's website		Minimal staff resources	Policy and conservation staff	X	X		Ongoing	
<b>Widen knowledge of the heritage of East Devon and its assets</b>	Develop improved web pages for the provision of information on heritage issues relevant to East Devon, including the Heritage Strategy		To be developed in-house, moderate staff resources with ongoing updates	Regular updates from policy and conservation staff. Links to, and input from partners	X	X		Initiate 2019-20, complete 2020-21, with regular updates	Survey on use of website and other programmes
	Encourage local groups / museums to engage with local schools		Moderate staff resources	Policy staff to circulate information		X			
<b>Celebrate and promote the heritage of East Devon (raise the profile)</b>	Promote strategy and web pages; develop a publicity plan to include press and social media		Moderate staff resources	East Devon staff, press office and Heritage Champion	X	X			No. of local groups / partners engaged
	Support events such as the annual Heritage Open Days and the East Devon AONB Heritage Conference. Promote heritage strategy and website at heritage events.		Moderate staff resources	Staff and Lead Councillor for Heritage presence at heritage events	X	X	X		Number of events attended; outcomes recorded
	Host an occasional heritage themed event / workshop for members and community representatives		Use of Council chambers and catering	East Devon staff, Lead Councillor for Heritage and Community Officer. Help from partner organisations		X		First event following first year's delivery plan report	Event feedback survey
Objectives Theme B	Actions and tasks	Stat. duty	Indicative resources	Delivery: Staff and Partners	Timescale			Notes	Indicative monitoring
					S	M	L		

<b>Positively manage the heritage assets of East Devon:</b>  <b>Conservation Areas</b>  <div>Agenda page 18</div>	<b>Undertake a programme of Conservation Area review:</b>	<b>YES</b>							
	Prepare internal procedural guidance for Conservation Area review and management plans.		Staff resources, policy team.	Policy officer, in consultation with conservation team	X			This work is programmed for 2019 - 20	Completion of guidance
	Develop a process for communities to help deliver reviews, including training and monitoring. Propose a suitable pilot scheme.		Staff resources, policy team	Policy officer, in consultation with conservation team and local amenity group.	X	X			Completion of guidance
	Deliver a pilot scheme Conservation Area review involving community group/s to include local listed items. Monitor input, output, outcomes and estimate impact to inform future programme.		Considerable input from staff and community group initially but potential to improve long term resources. Possible external funding / grant.	EDDC staff with assistance from community groups and in consultation with partners		X		Pilot scheme proposed 2020-21	Full criteria to be developed, including impact of community involvement.
	Develop a programme to prioritise reviews over 12 years. Consider priorities in Conservation Areas within towns and other Built Up Area Boundaries most subject to change and those with active Neighbourhood Planning and Historic Interest Groups.		Staff resources, policy and conservation tem	Policy officer, in consultation with conservation team and other planning staff	X			This work is programmed for 2019-20	Completion of report
	Undertake the programme of reviews, to include full and interim reviews and other methods where appropriate, some involving neighbourhood planning and local history / amenity groups. Prepare appraisals and management plans.		Much input from community and staff initially but potential long term investment. Possible funding, see Theme C	Programme managed by policy staff working with communities with input and sign-off by conservation team. Assistance from partners, especially if able to secure funding for training.		X	X	Long term protection of assets and benefits for the community.	Numbers of reviews and management plans. Other Indicators developed for pilot scheme
	Complete Lymptone C A review boundary extension		Staff resources	Consultation and adoption may be managed by policy staff		X			Adoption
<b>Objectives Theme B</b>	<b>Actions and tasks</b>	<b>Stat. duty</b>	<b>Indicative resources</b>	<b>Delivery: Staff and Partners</b>	<b>Timescale</b> S M L			<b>Notes</b>	<b>Indicative monitoring</b>

Conservation Areas	Determine if any parts of the district merit designation as a Conservation Area and if so designate new areas:	Yes							
	Conduct annual review of areas that may merit designation		Staff resources	Annual review by staff	X	X	X		
Heritage at Risk	Provide information and a link to the Historic England register of heritage assets at risk on the Council webpage	Yes	Minimal staff input complete and update	Information supplied by Historic England	X	X		Minimal input with annual updates	
	Liaise with partners and organisations including Building Control, Estate Agents and communities to enable reporting on assets at risk where possible and start a list.		Staff resources, to provide information on website	Policy staff to facilitate in consultation with conservation team		X		Awareness of assets at risk can help to inform programmes and focus action.	Numbers of heritage assets at risk, numbers reported, surveyed or monitored
	Include Grade II condition survey within pilot scheme Conservation Area review, where there is a community desire to do so.		Current Grade II condition survey training material is available through Historic England website. Policy staff to help facilitate.	Policy staff to help facilitate Historic England training for community pilot scheme, if group wish to proceed with this.		X		Potential for long term impact on protection of assets	No. of surveys completed, residents trained, HAR improved
Local List	Establish a local list of non-designated assets:	No							
	Produce a document advising communities on procedures for a Local List, with guidance on selection criteria. Public consultation and adoption.		Policy officer (most work completed)	Document under consultation March 219	X				
	Following adoption of guide, receive submissions from communities and historic groups.		Otter Valley and Sid Vale Associations have submitted items for consideration	Submissions from town or parish councils, ward members, neighbourhood planning groups and local amenity groups.	X			Ongoing subject to available resources	Number of groups submitting items consideration
Objectives Theme B	Actions and tasks	Stat. duty	Indicative resources	Delivery: Staff and Partners	Timescale S M L			Notes	Indicative monitoring

Local List	Set up procedures within the Council for assessing, recording and publishing a list of non-designated heritage assets		Policy staff resources	Policy officer in consultation with conservation team	X				
	Develop and deliver a programme based on items submitted, starting with a pilot scheme. Roll out to other areas subject to available resources.		Staff resources; considerable input to set up list but less time needed for annual maintenance	Policy officer working with local group and with input from conservation team.	X			Positive impact on planning process and benefits for local communities	Number of items approved for local list, other pilot scheme criteria
Encourage development which enhances distinctiveness	Provide links to further guidance which address the most common issues, on website, much from Historic England.		Minimal staff resources to provide links on webpages	Policy officer in consultation with conservation team		X			Feedback survey on information provided
Agenda page 20	Build in heritage and local distinctiveness themes in emerging Design Guide Supplementary Planning Document, with link to Heritage Strategy		Moderate staff resources	Policy officer with Design Guide working group, followed by public consultation	X			This Guide will carry weight in planning decisions	
	Provide information on the website on sourcing of local materials, in particular a stone quarry guide		Moderate staff resources	Conservation and policy team, available through new webpages		X			Completion of guides, number of guides requested; feedback
	Update and publish shopfront and any other relevant guides relating to heritage		Moderate staff resources	Conservation and policy team, available through new webpages		X			Completion of guides, no. requested; feedback



Objectives Theme C	Actions and tasks	Stat. duty	Indicative resources	Delivery: Staff and Partners	Timescale S M L			Notes	Indicative monitoring
<b>Work with partners and corporately to identify joint projects and maximise funding</b>	Increase attendance at meetings or events with partner organisations to work towards common goals		Staff resources, potential to pool resources with partners for maximum benefit	Policy and/or conservation officer working with external partners such as the East Devon and Blackdown Hills AONBs	X	X	X	Ongoing	Meetings attended, outcomes recorded
	Create Council working group to work towards joint objectives and co-ordinate projects and programmes. Provide website links to regeneration, economy and tourism sectors.		Moderate staff resources	Policy and conservation team staff working with other sections such as private sector housing, building control and regeneration.		X		Set up regular meetings and continue according to outcomes	Meetings attended, outcomes recorded
	Work with others to identify projects and sources of funding		Potential to attract grant funding for heritage projects or programmes, especially those involving the community	Policy staff working with external partners and EDDC departments	X	X	X		Projects and funds identified
<b>Work with communities</b>	Facilitate, or advise on, a range of training opportunities especially for neighbourhood planning / community groups with an interest in heritage.		Moderate staff resources to develop training opportunities for pilot scheme. Capacity building within community can provide a valuable long term resource of trained residents.	Policy staff working with external partners and local community groups.	X	X			Criteria to be developed, along with pilot scheme
	Produce a template to guide neighbourhood planning groups in site assessments in relation to heritage		Minimal staff resources	Policy staff	X				



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

**Date of Meeting:** 26 March 2019

**Public Document:** Yes

**Exemption:** None

**Review date for release** No document review is planned.

**Agenda item:** 8

**Subject:** **East Devon and Blackdown Hills Landscape Character Assessment**

**Purpose of report:** This report advises of the consultation on the draft East Devon and Blackdown Hills Landscape Character Assessment and it summarises and comments on responses received. The report seeks formal approval for endorsement of the revised Landscape Character Assessment that has been amended, where appropriate, taking comments into account.

**Recommendation:** **Strategic Planning Committee is recommended to note the comments received on the Draft document and to adopt the revised (2019) East Devon and Blackdown Hills Landscape Character Assessment for use in decision making.**

**Reason for recommendation:** To gain formal approval for the amended Landscape Character Assessment.

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

**Financial implications:** There are no specific financial implications.

**Legal implications:** To be completed by Legal.

**Equalities impact:** Low Impact

**Risk:** Low Risk

There is a low risk identified and associated with securing approval for this document.

**Links to background information:** • Links are provided in the body of the report.

**Link to Council Plan:** The Landscape Character Assessment has direct links with – [“Delivering and Promoting our Outstanding Environment”](#).

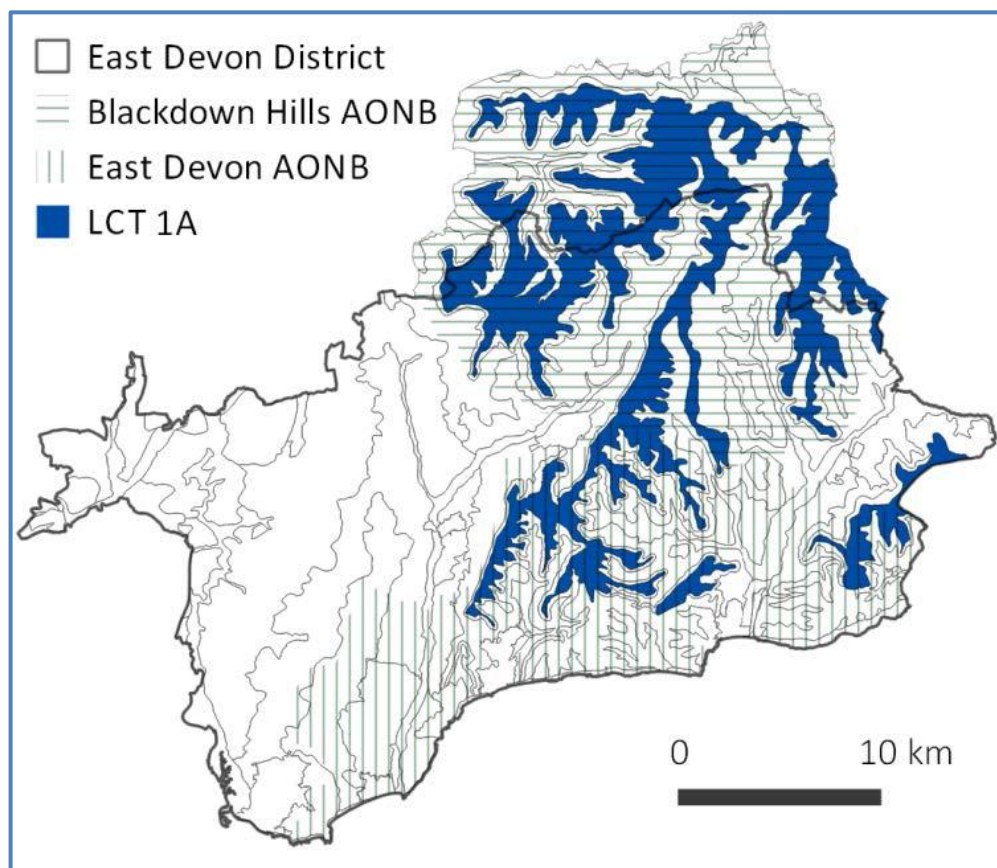
## 1 Introduction

- 1.1 A Landscape Character Assessment (LCA) seeks to characterise and describe features, landform and land uses that make up the landscape. Through having a thorough understanding of landscape character it becomes easier to plan and manage potential changes in a more consistent and robust manner. Natural England have produced guidance on LCA production - An Approach to Landscape Character Assessment - October 2014 which can be viewed at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/691184/landscape-character-assessment.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/691184/landscape-character-assessment.pdf)
- 1.2 East Devon District Council, working in partnership with Devon County Council and the East Devon Area of Outstanding Natural Beauty (AONB) partnership and the Blackdown Hills AONB partnership, commissioned the assessment work in 2018 and, following Strategic Planning Committee approval on 27 November 2018, the draft was subject to public consultation that concluded in February 2019.
- 1.3 The LCA covers the whole of East Devon district, which means that it explicitly covers the whole of the East Devon AONB. The assessment also, however, covers the whole of the Blackdown Hills AONB and whilst most of this designated area falls in East Devon parts are also located in Mid Devon, South Somerset and Taunton Deane.
- 1.4 This Landscape Character Assessment is not a brand new piece of work, rather it is an update of an assessment that was completed in 2008. The update responds to changes that have occurred both in the landscape and also in approaches and methodology of assessment since the original work was undertaken.
- 1.5 The now amended LCA (the document that we seek endorsement of), and information on the consultation draft and responses received, can be/will be available to view on the Council web site at: <http://eastdevon.gov.uk/planning/planning-policy/environment-and-green-infrastructure/landscape/>
- 1.6 The LCA is intended to have a wide range of end users – the list is not exhaustive but it includes planners, developers, farmers and foresters and land users and managers, those involved in conservation and more generally the public and local communities. The document therefore offers commentary, advice and recommendations relevant to these and other users and user groups.

## 2 The Format and Structure of the Draft Landscape Character Assessment

- 2.1 The bulk of the LCA is based around 18 different landscape character types (abbreviated to LCT) that are identified, categorised and found in East Devon. For example area LCT 1A is defined as “*Open Inland Planned Plateaux*” and the assessment advises that:  
*“This LCT occurs in the eastern half of the Study Area, and contains some of the highest land. It comprises a series of elevated fingers of land which are flat or gently undulating. The boundaries of the LCT are generally clearly marked by the transition to steep scarp slopes below (LCT 2A). This is a relatively simple landscape, with strong horizontal elements: flat horizons, straight roads and regular field boundaries.....”*

- 2.2 The map reproduced below, taken from the draft assessment, defines the extent of this 1A character type. For this and the other 17 defined landscape character types the assessment describes the key characteristics that define and establish the landscape type, what past and current potential forces or factors exist that have or may produce changes (these are changes potentially for the worse, though could be for the better) and what changes may arise in the future. For each landscape character type the assessment also identifies a strategy for managing potential forces for change along with more detailed guidelines.



- 2.3 For a complete picture of all document content, and specifically all area types, the LCA, both the consultation draft and now the amended version, should be read in their entirety.

### 3 Consultation Response

- 3.1 In total there were responses received from 21 individuals or organisations on the consultation. Most were supportive of the LCA and its content and approach. Appendix 1 to this report provides more details of who responded and the comments they made as well as an officer response and recommended changes arising from comments. A very succinct commentary on responses received is, as well, provided below. It is stressed, however, that for a complete picture all responses should be read in their entirety, web links to comments are provided in Appendix 1.

- 3.2 Four of the responses that were received were from agents acting for land owners or businesses with an interest in land, with a view to possible potential for development; these were:

- Barton Wilmore – for land to the east of Honiton;
- David Lock Associates – land at Cranbrook;
- Lichfields – land at Devon Cliffs Holiday Park near Exmouth; and

- Savills – land at Uplyme west of Lyme Regis.

- 3.3 Of these agent responses Barton Wilmore considered the LCA to be insufficiently detailed to be of specific relevance to land that their client has an interest in. The other three respondents questioned the degree to which the LCA sought to define an appropriate strategy and means for managing potential change in defined areas. There was a view that the LCA should set an approach that was more accommodating of development and also that the LCA seeks, inappropriately, to establish policy rather than provide evidence.
- 3.4 In broad response to these agent comments it is considered that the LCA is pitched at an appropriate level that strikes an appropriate balance between giving a broad brush overview of landscape types (and avoiding excessive levels of detailed assessment) whilst also giving a steer on key factors that are relevant to and may inform future decision making. An objective being to support the integrity of and the positive characteristics that help define the separate landscape character types. There are, however, some recommended changes made to the proposed LCA for adoption to clarify that it does not constitute formal planning policy (rather it is evidence to assist with application of policy and future policy making) and that in arriving at decisions (for example determining planning applications) a full range of material considerations, across social, economic and environmental fields, may be relevant and need to be taken into account. The recommended changes are set out in Appendix 2. Also in Appendix 2 there is commentary on inclusion of a new section in the LCA called “Forces for Change” that comments on potential matters that could impact on the landscape in the future.
- 3.4 There were a limited number of comments from public bodies and some individuals that gave either general support or neutral comment for or on the LCA without highlighting need for change. In one case it was not considered that the comment received really related to the LCA but were concerned with past planning decisions.
- 3.5 The bulk of comments received were, however, supportive of the principles behind the assessment, the approach taken, conclusions reached and the general form and content. A number of respondents falling into this broad category made comments on matters of detail that were seen as beneficial in respect of improving and refining the LCA and in most cases comments received have informed text amendments in the proposed final LCA.

#### **4 The Revised Draft of the LCA and Recommendation of Document Endorsement**

- 4.1 In light of the comments received on the consultation, and recommendations for change by officers set out in Appendix 1, the draft LCA has been amended to form a final document on which approval is sought. It is stressed that Appendix 1 does not include full details of all changes made in the proposed draft of the document, rather it concentrates on the more significant matters or issues. Minor changes have not been explicitly logged or recorded and for a complete picture of changes the old version and the new version of the LCA need to be read alongside one-another.
- 4.2 The revised LCA, that is recommended for approval, will be on the planning policy web pages at: <http://eastdevon.gov.uk/planning/planning-policy/environment-and-green-infrastructure/landscape/>

- 4.3 On assumption of endorsement the LCA will provide a key landscape evidence document to support planning decision making in East Devon, including in respect of determining planning applications and future policy making. It will, as well, help inform much wider decision making, plans and management regimes as may be undertaken by this council, its many partners (specifically including the AONB partnerships and Devon county Council) and other organisations.

## Appendix 1 - Comments Received on the Draft Landscape Character Assessment Along With Officer Response and Recommendations

In total there were response received from 21 individuals or organisations on the consultation. Over the page there is a table that, by column heading, sets out details of;

1. **Respondent** - Identifies the person or organisation making the response – it is highlighted that the text in this column also forms a web link to the submission received (though with appropriate contact details redacted). In some cases responses received relate in part or whole to specific areas of land that the respondent has an interest in – where this is the case summary text is also provided to explain where the land is;
2. **Officer Summary of Issues Raised** - Provides an officer summary of key points raised (or in some cases the text or extracts are reproduced), relevant to the LCA report, in comments made – it is stressed that this is an officer summary only and for a complete picture (specifically as made by the respondent) representations should be viewed in their entirety;
3. **Officer Commentary on issues Raised** - An officer commentary on the issues raised in consultation response and comment on appropriateness of changes to the LCA; and
4. **Summary of Recommend Changes to the LCA** - Details of any changes made to the Draft LCA in response to comments made.



Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
<p><a href="#">Barton Willmore</a></p> <p>It should be noted that in their response Barton Wilmore highlight an interest in land to the east of Honiton.</p>	<p>In their response Barton Wilmore (their paragraph 2) advise that: <i>“The Consultation Draft focuses on the Landscape Character Types which, as noted within the report are generic types of landscape which can occur in different places” (p.9). For this reason, the absence of geographically-specific distinctive characteristics is noted. This undermines the robustness of the assessment where there are distinct variations within the Landscape Character Types</i>”. They consider that the overall assessment work should provide more detail of variations across and within the differing Landscape Character Types, specifically in respect of managing potential development pressures. They advise that this level of detail is typically provided in Landscape Character Assessment processes.</p>	<p>The Landscape Character Assessment work that was commissioned was by clear intent and design a higher level assessment that sought to generate a generic overview of key themes and patterns in the landscape. Whilst some Landscape Character Assessment may drill down into more detailed work (as Barton Wilmore suggest would be appropriate) this is by no means a universal approach and to take this approach across the whole of the study area would be extremely time consuming and expensive. Furthermore the assessment process that has been applied is directly compatible with the approach taken across the rest of Devon, it is a widely used standard and does not, in any sense, preclude more detailed evaluation that could be undertaken (and would be expected) for detailed or specific areas of land.</p>	<p>In response to the issues raised it is not recommended that any changes are made to the LCA.</p>
	<p>Barton Wilmore object to the LCA (their paragraphs 2 and 3) on the basis that it does not provide an assessment of urban areas and the characteristics of urban areas and the influences they have on surrounding areas. They highlight that the urban character of Honiton influences and impacts on landscape to the east of the town and that this should be referred to in the overall assessment.</p>	<p>To assess all towns and urban areas, through the LCA process, and as may be implied should be done, would be a very time consuming and expensive exercise. It is not appropriate as the assessment process, by design, does not seek to highlight every possible consideration that impacts on adjoining land areas and specifically the interactions between urban and rural areas; rather it seeks to provide a generic overview of key characteristics. The LCA does not preclude site specific assessment work from being undertaken, rather it actually provides a context to help with more detailed assessment.</p>	<p>In response to the issues raised it is not recommended that any changes are made to the LCA.</p>



Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
	<p>Barton Wilmore (in their paragraphs 5 to 8) highlight that the assessment for the landscape area 3A (the area of land that they have interest in falls in 3A) does describe some of the feature that are found in their land area of interest but the description also includes feature that are not present. They also highlight that there are factors that are relevant to their land area of interest that do not feature in the description or related assessment.</p> <p>They raise concern that the LCA does not set out as strategy for managing development of land that they have an interest in and dismiss the strategy as being of limited relevance to their site interests.</p>	<p>It is recognised and acknowledged that, in being a broad brush assessment, that not every specific detailed area of land will contain all of the generic features listed, as being characteristic, for any given Landscape Character Area type. By clear intent the LCA is broad brush and it would not be expected that any given specific site will not contain everything that an overarching description of character area types will contain.</p> <p>It would, short of producing an extremely long and detailed document (at great expense), be impossible to produce the kind of highly detailed assessment, across the whole of East Devon and the Blackdown Hills, that Barton Wilmore imply is appropriate.</p>	<p>In response to the issues raised it is not recommended that any changes are made to the LCA.</p>
<a href="#">Colaton Raleigh Parish Council</a>	<p>The Parish Council advise:</p> <p><i>“The report is well structured and features many different kinds of landscape.</i></p> <p><i>However, Colaton Raleigh Parish Council is concerned that the report does not address the importance of preventing soil loss and preserving soil fertility for these landscapes.</i></p> <p><i>Landscape management that fails to address the prevention of soil erosion can lead to a reduction in vegetation as well as more soil deposits in rivers and water courses. Fertile soil needs to be protected both with farming techniques and with attention to new building. This is especially important now as climate change accelerates soil erosion and it is paramount to preserve soil fertility.”</i></p>	<p>The observations are welcomed and it is agreed that it would be beneficial for soil erosion considerations to be referenced in the revised LCA.</p>	<p>Include references to soil erosion considerations.</p>

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
<a href="#">Cranbrook Town Council</a>	<p>The town council note the broad ranging scope of the LCA and they highlight the ongoing work on the Cranbrook Plan, they comment that the LCA is: <i>“a very professional document, providing up to date assessments.”</i> In comments the town council note threats that can occur to the landscape and potential for mitigation.</p> <p>The town council advise that they <i>“commend the report, and reinforce the recommendations in the Cranbrook Master plan, reminding EDDC planning of the need to adhere to principles shown in local plans - such as preserving the green spaces and corridors between neighbouring villages, thus preventing their absorption into a ‘greater Cranbrook’”</i>.</p>	<p>The comments are noted and welcomed.</p>	<p>No changes are recommended.</p>
<a href="#">David Lock Associates on behalf of East Devon New Community Partners</a>  David Lock Associates advise that they are writing on behalf of the East Devon New Community partners (EDNCp) with	<p>David Lock Associates (in their “First” issue raised) provide support for landscape character area 3E (the area in which Cranbrook falls) in respect of the way that it addresses areas <i>“affected by development or where development is planned”</i>. They consider that the full extent of permitted and allocated development at Cranbrook should be shown under the ‘Main Town or City’ classification, which has reference number LCT7. They also consider that the document should explain that committed development will be treated as part of LCT7.</p>	<p>It is agreed that it would be appropriate and informative to users of the LCA to show the area of Cranbrook that is built, has planning permission for development and which is allocated in the East Devon Local Plan for development under the ‘Main Town or City’ classification (this has area Type 7). However at this stage (as at March 2019), as it is still an emerging plan, it would be inappropriate to show the additional proposed allocations for development in the Cranbrook Plan under this classification. Bearing this change it is not relevant to have further written commentary in respect of committed development in the text. It is also appropriate to show other newly built, permitted and local plan allocated sites elsewhere in the urban areas around East Devon under the classification.</p>	<p>Show, with a cross hatch notation, areas of land around Cranbrook and other towns that have planning permission for development or are allocated in the local plan.</p>

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
specific interest in Cranbrook.	<p>David Lock Associates (in their “Second” issue raised) express concerns in respect of LCT3E, and the text box headed “Landscape Strategy” that that <i>“The retention of all existing landscape features is not always practicable and, indeed, may not always be desirable in the long term.”</i> Inappropriate retention, they contest <i>“can stifle placemaking – in particular the ability in which to deliver well-connected and designed layouts for modern living.”</i> They suggest that text should be amended to promote the best practice design to consider the opportunities for green infrastructure creation to include where appropriate elements of the existing landscape that are of particular value and consistent with wider design objectives or appropriate compensatory measures.</p>	<p>It is agreed that absolute retention of all landscape features, in all instances, can be inappropriate. On this basis it is desirable to amend the text, however there is a concern that the changes promoted go far and could threaten and bring about loss of landscape features that are important or desirable to retain. In response, and following more detailed officer working group critique, it is considered the text should be amended to read:</p> <p><i>Landscape strategy</i>  <i>In parts of the LCT affected by development or where development is planned, the existing landscape structure <b><u>and character</u></b> should <b><u>be assessed in terms of its value, susceptibility to change,</u></b> and condition, <del>form the framework for development and associated</del> <b><u>Landscape features worthy of retention can help to create high quality, distinctive and functional places and opportunities should be taken to include these within</u></b> Green Infrastructure <b><u>for new built development, and allow for their ongoing management.</u></b> Elsewhere, the strongly-rural character should be retained. Throughout the LCT, habitats should be enhanced and settlements should retain their distinctive characters.</i></p>	<p>Amend the text as highlighted in officer commentary.</p>

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
<a href="#">Devon County Council</a>	<p>Devon County Council welcomed the LCA and highlighted that it will help ensure that relevant policies in statutory development plans, including Devon's Minerals and Waste Plans, are underpinned by up-to-date evidence.</p> <p>They suggested that the hand drawn pictures may be better annotated and would welcome opportunities to further highlight the implications of future forces for change where these impact on Devon's economy and the health, safety and wellbeing of people, including flood risk. They highlight, for example, that the loss of trees through disease such as Ash Dieback threaten not only the distinctive character and openness of the landscape but may also reduce the amount of shade along recreational routes, potentially resulting in adverse health impacts in a warming climate. They would welcome further emphasis of these issues to help to strengthen and support the associated guidelines.</p> <p>In addition to these broad brush issues a number of more detailed and specific points were raised, these are reproduced below showing the text in the submitted representation:</p>	<p>It is agreed that it would be desirable to improve the text on the hand drawn plans to make them more legible. It and also agreed that, what are minor tweaks to the document, are relevant to strengthen and support the guidelines. These will be addressed in a new section called forces for change in the introduction.</p>	<p>Recommended that the text on the hand drawn pictures are improved</p>
	<p>Page 6 – Para 1.6 – Relationship to other documents:  <i>The list of documents should include the Devon Minerals Plan and Devon Waste Plan (and their Somerset equivalents including Taunton Deane Local Plan/Core Strategy that cover part of the Blackdown Hills within the study area).</i></p>	<p>It is agreed that, as these plans should be informed by the LCA, that links should be provided to relevant Devon and Somerset waste and mineral plans and local plans.</p>	<p>Links are made suggested plans.</p>
	<p>Page Para 12 - 2.6 LCT 2:  <i>Scarp slopes Typo - should be LCT 2A, not LCA 2A.</i></p>	<p>Agree that this is a typographical error.</p>	<p>Amend text as suggested.</p>
	<p>Page 13 Map 3: LCTs  <i>It would be helpful if this map could be annotated to highlight the key changes made to LCTs since the original LCA was published back in 2006. This would serve as a suitable record of such changes.</i></p>	<p>An appendix is added with the changes made to the landscape character type boundaries – showing location and reasons for change from the past LCA to this LCA and correcting anomalies and mistakes in the past LCA.</p>	<p>Add an appendix showing changes.</p>
	<p>Page 30 LCT 1C: - Past and current forces for change  <i>We would query the reference to “active quarrying and processing” in relation to the Pebble Bed Heaths – ‘recent’ would be more accurate following the cessation of quarrying and processing at Blackhill, Venn Ottery and Rockbeare Hill.</i></p>	<p>It is agreed that the change proposed would add clarity.</p>	<p>Amend text, as suggested.</p>

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
	<p>Page 30 LCT 1C: Future forces for change – 1st bullet  <i>There seems to be a misunderstanding of the purpose of the Mineral Safeguarding Area – it does not provide for future mineral extraction and infrastructure but seeks to avoid other forms of development that may sterilise the mineral resource. Paragraph 3.3.8 of the Devon Minerals Plan states that “inclusion of land within a Mineral Safeguarding Area carries no presumption that mineral development would be acceptable or that planning permission would be forthcoming for extraction”. In addition, the Pebble Beds are protected through Policies M18 (the AONB great weight/exceptional circumstances test) and M17 (international nature conservation sites).</i></p>	<p>It is agreed that the role of safeguarding is to resist development that could prejudice potential for mineral extraction rather than indicate that extraction should happen or is appropriate.</p>	<p>Amend text to make role of safeguarding clear.</p>
	<p>Page 30 LCT 1C: Future forces for change – 2nd bullet  <i>The risk of losing various types of trees due to the impact of climate change may also have a negative impact on physical activity where these trees offer shade and support other recreational activities such as photography and art. Where the loss of trees is known to be along well used recreational spaces, we recommend a suitable guideline on the following page to ‘plan to mitigate loss of trees that provide interest and shade for areas and routes used for outdoor activity’. This is likely to be applicable for many more LCTs.</i></p>	<p>It is agreed that loss of trees could have adverse impacts on recreational routes and wider activities and therefore planning to mitigate adverse impacts is appropriate. In the new “Forces for Change” Section” relevant text is included.</p>	<p>Add text to highlight considerations relating to tree loss.</p>
	<p>Page 30 LCT 1C: Future forces for change –  <i>5th bullet Should ‘West End village’ be ‘West Hill village’?</i></p>	<p>This reference to West End villages is actually somewhat spurious, and in reviewing the document it is more appropriate to just take out the bullet point.</p>	<p>Amend text to remove bullet point.</p>
	<p>Page 38 LCT 1E: Future forces for change – 1st bullet  <i>See comments above on Page 30 2nd bullet regarding loss of trees</i></p>	<p>It is agreed that loss of trees could have adverse impacts on recreational routes and wider activities and therefore planning to mitigate adverse impacts is appropriate.</p>	<p>Amend text to highlight considerations relating to tree loss.</p>
	<p>Page 47 LCT 3A: Guidelines – Plans  <i>We welcome the penultimate bullet point to enhance the Public Rights of Way network and create circular trails, as this will help sustain and increase physical activity provision.</i></p>	<p>Comments and endorsement of the LCA is welcomed.</p>	<p>No change.</p>

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
	<p>Page 55 LCT 3C: Guidelines - Plan  <i>We support the guideline to 'Develop integrated flooding and water quality solutions (including Natural Flood Management) for floodplains and wider river catchments.' This will help to future proof existing levels of flood protection against the increasing risks from climate change. We suggest that the following is included: "Work with farmers to encourage sustainable farming practices and land management such as soil aeration, crop selection or hedge reinstatement to reduce, attenuate or slow the runoff from agricultural land".</i></p>	<p>Comment and endorsement is welcomed and it is agreed that the suggested change would help.</p>	<p>Amend text, as suggested.</p>
	<p>Page 78 LCT 4D: Future forces for change  <i>In the penultimate bullet point, is the issue loss of local building stone, or is it that quarrying of local building stone may cause loss of bat habitats? This needs to be clearer and should avoid giving the impression that quarrying of local building stone is necessarily a problem, as it can assist in maintaining local distinctiveness/character.</i></p>	<p>There are two separate issues here, one about stone for quarrying and the other about bats. It is considered that they should feature in separate bullet points.</p>	<p>Amend the text as suggested.</p>
<p><a href="#">Devon and Cornwall Police</a></p>	<p>Devon and Cornwall Police, in comments made, highlight the role of the Police Designing out Crime Officer as the single point of contact for the planning authority, architects and developers in designing out opportunities for crime, fear of crime, antisocial behaviour (ASB) and conflict in the built environment.</p> <p>They advise that <i>"Legislation under Section 17 of the Crime and Disorder Act (1998) places a duty on the planning authority to consider preventing crime, fear of crime, ASB and other behaviour which adversely affects the local environment (as referred to in the NPPF). Being mindful that this document is to inform the management of change and to deliver sustainable development, I hope you deem it appropriate that opportunities for designing out crime, the fear of crime, ASB and conflict are recognised and referenced in such a document."</i></p>	<p>Whilst it is understood and acknowledged that initiatives to design out crime can be very relevant and important in many development proposals the role of the LCA is specifically concerned with landscape matters, rather than broader brush design and development matters. Should reference be made to designing out crime in this LCA it would be logical to include reference to a great many other guidance documents on a diverse range of subject matters, this would make the LCA unreasonably long. The change suggested is, therefore inappropriate.</p>	<p>No change.</p>



Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
<a href="#">Devon Gardens Trust</a>	Devon Gardens trust advise: <i>"The Devon Gardens Trust would like to congratulate you on this excellent report. We would suggest that perhaps mention should be made of the contribution that historic designed landscapes particularly those in the English Landscape Style associated with many of country houses and country estates in East Devon have made to the landscape character of the County."</i>	It is agreed that it would be desirable for mention to be made in the LCA of the contribution that historic designed landscapes associated with country houses and country estates.	Put extra text into the 1B profile (see Killerton and Bickton references).
<a href="#">Equality and Human Rights Commission</a>	The Equality and Human Rights Commission advise: <i>"The Commission does not have the resources to respond to all consultations, and it is not our practice to respond to consultations on local plans or infrastructure projects unless they raise a clear or significant equality or human rights concern."</i>  <i>Local, Parish and Town Councils and other public authorities have obligations under the Public Sector Equality Duty (PSED) in the Equality Act 2010 to consider the effect of their policies and decisions on people sharing particular protected characteristics. We provide advice for public authorities on how to apply the PSED, which is the mechanism through which public authorities involved in the planning process should consider the potential for planning proposals to have an impact on equality for different groups of people."</i>	It is not considered that the LCA raises issues that have a bearing on the matters raised in the Public Sector Equality Duty and therefore no further action or changes to the document are appropriate.	No change.
<a href="#">Exmouth Community Association</a>	The Exmouth Community Association welcomes the LCA and the work that has gone into its production. In this context they highlight the stage of production of the Exmouth neighbourhood Plan (approaching referendum) and they agree with the strategies for the three landscape types at Exmouth. They stress that the LCA contents need to be pursued in practice advising <i>"In this way, hopefully, through a mix of direct action, influence and partnership working, our wonderful environment will in fact be protected and enhanced in the way this Assessment recommends"</i> .	The positive comments are welcomed.	No change.

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
<a href="#">Hawkchurch Parish Council</a>	Hawkchurch Parish Council advise that they accepts the recommendations of the draft document. They state that: <i>“We note that there are very clear landscape management planning guidelines for each landscape character type in the Hawkchurch parish and that they are comprehensive and appropriate. The Parish council expects these guidelines to be adhered to by EDDC in any future planning decisions and considers that to a large extent the character assessment in conjunction with the Local Plan reduces the value of having a Neighbourhood Plan. We may however evaluate the possible benefits of a Neighbourhood Development Order to be used in conjunction with EDDC plans and will approach the Senior Planning Officer to discuss this further.”</i>	The comments made are noted and	No change.



<p><a href="#">Lichfields on behalf of Bourne Leisure</a></p> <p>These representations are specifically in respect of the Devon Cliffs Holiday Park near Exmouth that Bourne Leisure operate.</p>	<p>Whilst it is advised that Bourne Leisure supports the overall process of a Landscape Character Assessment (their 3<sup>rd</sup> paragraph) they (in their 4<sup>th</sup> and 5<sup>th</sup> paragraphs) consider that the assessment should not include the planning guidance section that exist as part of each section that assesses the different landscape character types. They suggest that this section amounts to policy</p> <p>They consider that the LCA should be limited to providing an evidence base that is limited to assessment of the landscape types, character and characteristics and not include what they see as creating new policy that <i>“fails to recognise the wider context of how it would be used as a material consideration in planning decisions alongside the development plan and other material considerations.”</i> They contest that such an approach to LCAs is inconsistent the national guidance issued by Natural England.</p>	<p>As part of the assessment of each LCT there is a page of text that includes a heading title called “Landscape Management and Planning Guidelines” and under this three sub-headings (with bullet point guidance under these that read:</p> <ul style="list-style-type: none"> <li>- “Protect” – which is concerned with key characteristics or features that should be protected;</li> <li>- “Manage” – that is concerned with management issues; and</li> <li>- “Plan” – that is geared around planning considerations.</li> </ul> <p>It is the “Plan” element that is objected to. However, it should be noted that these three elements are explicitly identified in the Natural England guidance on LCA work and many LCAs include such guidance. The plan references in the Natural England document focus on the plan aspect being primarily concerned with informing future plan making and policy production – and the LCA will be of great importance in respect of future policy making. However, it is considered that the guidance that the LCA provides, through the “Plan” headings is also useful in respect of giving some pointers and assistance to those determining planning applications and indeed in respect of wider tasks, specifically including management. In providing the landscape guidance through the LCA it is acknowledged that any decision taker will need to take into account many other (non-landscape) matters when making decisions but as the LCA is concerned with landscape matters it is reasonable for it to address and concentrate on landscape matters and not comment on other considerations that maybe taken into account in respect of decision making; it should be seen as a given that a decision maker should take into account all relevant considerations, on all relevant topic, when arriving at decisions.</p>	<p>Whilst no substantive changes are seen as appropriate in respect of comments received there are a number of recommended changes, from these and other comments, that are set out in Appendix 2 to this report.</p>
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Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
		The LCA, in providing guidance, should be read alongside policy documents, specifically including the East Devon Local Plan, with, for example, Strategy 46 being explicitly concerned with landscape quality issues. Furthermore the guidelines in the LCA (to 'protect', 'manage' and 'plan') are consistent with requirements of the European Landscape Convention, which the UK Government ratified in law in 2007.	
	In their second key issue raised Bourne Leisure highlight that the LCA does not assess in detail the character of specific areas within those parcels. They consider that <i>“The LCA should be explicit on the limitations of the assessment, such as this one, and how this will affect its use in decision-making.”</i>	It is recognised that the LCA does not assess in detail the character of specific areas within the LCA. To do so on a comprehensive basis would not be reasonable (it would be hugely time consuming and expensive to seek to be universal in coverage). It is not considered, however, that there is any need to mention this point in the document, it is self-evidence from reading the LCA what matters and at what scale it does cover and by implication, therefore, what it does not cover. It should be noted, as well that the approach the LCA takes is a Devon-wide standard approach.	In response to the issues raised it is not recommended that any changes are made to the LCA.

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
	<p>Bourne Leisure makes explicit comment on LCT1b which is concerned with the Open Coastal plateaux. Much of Devon Cliffs Holiday Park falls in this landscape area.</p> <p>The LCA refer to impacts from coastal change management, including accommodating development at risk from coastal erosion, which the company welcomes. They consider that planning applications that arise, as a result of coastal change, should take account of all relevant policies.</p> <p>It's advised that <i>"Bourne Leisure considers that tourist accommodation comprises an important element of East Devon's Open Coastal Plateaux LCT and that this type of development can be particularly vulnerable to coastal change by virtue of its location."</i> They would wish to see flexibility for new development to be accommodated on the coastal plateau where existing uses may be threatened by coastal change. In this context they object to wording that seeks to retain (as undeveloped) the existing undeveloped landscape of the coastal plateaux.</p> <p>Bourne Leisure further object to references to resistance of expansion of coastal sites which can be seen in coastal views. This they regard as introducing planning policy through the LCA which they regard as inappropriate (they consider as worded the LCA would seek to wholly restrict new development) and they consider that planning decisions should be determined through consideration of all relevant matters. They suggest amendment to wording that in could allow for expansion of coastal sites unless such expansion <i>"would result in significant unacceptable harm to the LCT as a whole"</i>.</p>	<p>It is noted and recognised that if coastal change occurs this could impact on some facilities at Devon Cliffs Holiday Park (in crude terms some parts of the holiday park could be washed into the sea). National planning guidance and Local Plan policy give a clear steer on addressing coastal change (see for example Strategy 45 - Coastal Erosion). It would as a matter of course be appropriate for all relevant policies to be taken into account in determining any planning applications and the LCA does not need to point this out, rather, it is legitimate and appropriate for the LCA to address, as it does, landscape matters and considerations.</p> <p>In principle it is desirable for the coastal plateaux to be retained as undeveloped, it is a landscape type that is vulnerable to significant impacts as a result of development. Strategy 34 of the East Devon Local Plan, Undeveloped Coast and Coastal Preservation Area, affords specific protection for the undeveloped coast and land at and around Devon Cliff holiday Park falls in the defined policy area. The LCT guidance directly complements the overall policy approach of the East Devon Local Plan. It should also be noted that there are tourism policies in the Local Plan that would be specifically relevant to any new development at a holiday park.</p> <p>The change that Bourne Leisure suggest would establish a test that development would only be unacceptable if it adversely affected, in a significant way, the LCT as a whole. In this context it should be noted that this LCT is found a various points along the entire East Devon coast, specifically including up to East Devon boundary with Lyme Regis. A test, as suggested, would clearly be inappropriate.</p>	<p>In response to the issues raised it is not recommended that any changes are made to the LCA - other than in the description LCT 1B (boxed text under the LCT1B) to advise that the landscape type is "large scale and predominantly undeveloped".</p>

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
	<p>Bourne Leisure makes explicit comment on LCT4H which is concerned with Cliffs. Parts of Devon Cliffs Holiday Park are in or near to this landscape area.</p> <p>Within the context of coastal erosion and the potential for loss of properties to the sea Bourne Leisure object to reference in the LCA to replacement of facilities “inland” as opposed to wording that they prefer that advises of replacement being appropriate <i>“landward of the eroded cliff edge”</i>.</p> <p>Bourne leisure also reiterate there concerns that <i>“the LCA should not be introducing policy and any decisions made on the acceptability of development must be done so in the context of all planning considerations.”</i> They continue by advising (quoting paragraph 168 of the NPPF) that The LCA <i>“should specifically acknowledge that it will be necessary to support the businesses along the developed coast in its response to coastal erosion.”</i> They propose wording that would explicitly support development (as opposed to resist development) <i>“provided that this would not result in significant unacceptable harm to the attributes that give the LCT its character as a whole”</i>.</p>	<p>As the coastal setting and environment is so sensitive it is generally going to be desirable to avoid development (including relocating where lost to erosion) at or close to the sea edge. For this reason “inland” (where topically adverse landscape impacts can be expected to be far less significant) is seen as appropriate and more desirable than (just) being to “landward of the eroded cliff edge”.</p> <p>Likewise it would also be inappropriate, given sensitivity issues and also the existing coastal protection that correctly exists to be open ended, as representations imply, about accommodating development along cliff (edges).</p>	In response to the issues raised it is not recommended that any changes are made to the LCA.
<a href="#">Marine Management Organisation</a>	The Marine Management Organisation advise that decisions that affect or might affect the UK marine area must be made in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan (the South Inshore and South Offshore Marine Plans) or UK Marine Policy Statement. In this context they highlight three specific issues, as reproduced below:	The general observations are noted.	No change.
	<i>“In section 1.6 we recommend reference to the South Marine Plan.”</i>	It is agreed that it would be beneficial to refer to the South Marine Plan at this point in the LCA.	Amend text, as suggested.
	<i>“Landscape Character Types (LCTs) LCT 4A, LCT 4B, LCT 4D, and LCT 4H do, or may have relevance to the South Marine Plan area. We recommend referencing the South Marine Plan as a consideration in these LCTs.”</i>	Include references in the LCA in the section that is headed “Relationship to other documents”.	Amend text, as suggested.

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
	<i>"As the Marine Policy Statement (MPS) states that references to seascape should be taken as meaning landscapes with views of the coast of seas, and coasts and the adjacent marine environment with cultural, historical and archaeological links with each other you may wish to consider the MMO's Seascape assessment for the South Marine Plan Areas in your landscape assessment. More information on seascape including maps of the South marine character areas and visual resource mapping can be found in the South Marine Plan Technical Annex on pages 113-119."</i>	Whilst a relevant document specific changes are not recommended to the LCA.	No change.
<a href="#">Natural England</a>	Natural England advise that they <i>"support development of the landscape character assessment and have no specific comments to make at this stage."</i>	Support is welcomed.	No change.
<a href="#">Otter Valley Association</a>	The Otter Valley Association highlight the LCA as being an excellent piece of work, though they highlight cases where development has occurred that is/would be contrary to the references relating to protection of skylines and ridges. They highlight that the value of the work lies at the point at which the document is used in practice. The Otter Valley Association highlight two issues that are summarised below:	The positive comments are noted and welcomed.	No change.
	<i>"The main difficulty with the document was in using the maps, as it is very hard to relate the map to the LCT categories, even when enlarged by 200%. Also the poor choice of colours were too similar and very hard to differentiate."</i>	The colours used on the maps follow a Devon wide standard and for this reason using differing colours would be inappropriate. However it is suggested that, in paper version, Map 3 can be usefully read alongside the specific maps for each landscape character type that show the relevant boundaries only for each area. Following adoption of the document the intent is that an interactive map will be placed on the Council web site. This will make it far easier to see boundaries.	Also a hyper-link will be provided to the Devon County websites/ and East Devon web site.
	<i>"The document does not fully address the archaeology on the LCT 1C, the Pebblebed Heaths, not does it highlight the serious damage to narrow lanes caused by modern tractors, in LCT 3B and other LCTs. Some of the sketches could have had more content."</i>	The adverse impacts that can arise from tractors are noted though it is not clear what further archaeological references would be appropriate. It is appropriate to put in a reference to tractors in the new forces for change section of the document	Amend text, as suggested.

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
<a href="#">Mr P Girling</a>	Mr Girling advises: <i>“Whenever has East Devon District Council taken any notice of the fact that the Blackdown Hills are in an AONB when it comes to making decisions to protect them i.e. Dunkeswell Kart Club, which is a blight on the landscape and responsible for Air and noise pollution and excessive traffic on our roads? Lets face it The area surrounding Dunkeswell Aerodrome is a dumping ground for all unpalatable enterprises. What a complete and utter waste of time and money”.</i>	It is not considered that the comments made are explicitly relevant to the LCA so no changes to the document are considered appropriate.	No change.
<a href="#">R Churchill</a>	Ruth Churchill advises <i>“have read through section 1 (I will look at the rest when I get some more time) comments so far: 1.1 paragraphs 2 &amp; 3 begin 'It' without any clarity as to the entity to which the pronoun refers. 1.4 final bullet refers to a menu and section 2.3. I looked at section 2.3 and it did not make the sentence any clearer - the only other time the word menu is used in the document is in section 2.4 (should the x-ref be corrected?)”</i>	Correct the typing errors.	Amend text, as suggested.



Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
<p><a href="#">Savills on behalf of Hallam Land Management Ltd</a></p> <p>These representations are specifically in respect of land on the south eastern edge of East Devon, in Uplyme parish, abutting the Dorset town of Lyme Regis.</p>	<p>Hallam Land recognise the importance of LCA <i>“to provide a baseline understanding of the key landscape characteristics and types in East Devon”</i> and they also acknowledge that an update to the previous LCA is appropriate. However they express concerns around what they see as restrictive and inhibiting terminology.</p> <p>The land area that Hallam Land are specifically interested in falls in Landscape Character Type LCT 1B: Open Coastal Plateau. They highlight, for this land type, The Landscape Strategy states that it will <i>“Retain the Open Coastal Plateaux as a large scale and undeveloped landscape which forms a positive setting and skyline to the coast, World Heritage Site, South West/England Coast Path and several settlements”</i> and that <i>“Incursion of development onto higher land should be avoided.”</i> They consider that the LCA unreasonably expands on this to provide a restrictive approach to potential for accommodating development that does not consider wider, non-landscape, planning matters. These non-landscape matters, they highlight, include the need for housebuilding, and they consider that <i>“Lyme Regis is a town with an acute housing affordability issue with high house prices and relatively low average salaries”</i>. They also note that Lyme Regis <i>“is washed over by AONB landscape designations and with such constraints it is inevitable that future growth will have a degree of landscape impact wherever it is located.”</i></p> <p>Hallam land consider <i>“Given the challenges that Lyme Regis faces”</i> that the LCA should not explicitly seek to resist development in certain locations and rather the LCA should be more accommodating and use such language as <i>“maintain, conserve and enhance landscape character and minimise impact”</i> of development.</p>	<p>It is welcomed that a need for LCA updating is recognised. Whilst the concerns raised in the representation are noted it is considered that Hallam land are (perhaps) inferring an overarching importance to, and of the LCA, as being the only determinant of where and how future development might take place.</p> <p>Landscape Character Type 1B is extensive in scale, covering large expanses of coastal plateau land from Uplyme in the east to Exmouth in the west. Given its extensive nature it is appropriate for the LCA assessment to provide what is and can only be broad brush overarching comment and guidance that is applicable to a range of land areas where differing sets of circumstances may apply.</p> <p>In terms of assessing suitability of any land area for future development the LCA and its guidance will be one factor that is taken into account alongside all other relevant planning considerations. The LCA seeks to set out what is most appropriate in respect of landscape considerations but it is recognised that other considerations may pull in other directions.</p>	<p>Under Protect - 1B take the first two bullets under “Plan” and move to “Protect” – these read:</p> <ul style="list-style-type: none"> <li>• Retain the largely undeveloped character of the area.</li> <li>• Resist pressure to allow development on high ground which is currently undeveloped, and which forms the setting to settlements.</li> </ul>
<p><a href="#">South West Water</a></p>	<p>South West Water advise that they have no comments.</p>	<p>Noted.</p>	<p>No change.</p>
<p><a href="#">Taunton Deane Borough Council</a></p>	<p>Taunton Deane Borough Council advise <i>“I note that part of the assessment covers Taunton Deane Borough District. I would agree with the assessment made in our district.”</i></p>	<p>Noted.</p>	<p>No change.</p>

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
<a href="#">The Jurassic Coast Trust</a>	Jurassic Coast Trust advise that the LCA is “an extremely useful piece of work for the ongoing management of the Jurassic Coast.” they highlight the issues reproduced below:	Support is welcomed	No change.
	Page 25 - first bullet under key characteristics refers to 'Old Red Sandstone' - this is an outdated geological term and also incorrect. There is no 'Old Red Sandstone' in East Devon. Suggest change to Permian and Triassic sandstone and mudstone.	It is agreed that text amendments would ensure the accuracy of the document.	Amend as suggested in representation.
	Page 25 - What Makes it Special paragraph - the LCT doesn't exclusively form the setting of the WHS, only part of it.	Comment is noted and agree with and changes are therefore recommended.	Amend as suggested in representation.
	General comment - All LCTs that are adjacent to the WHS arguably contribute to its setting. Relevant LCTs are 1b, 1c, 2a, 3a, 4a, 4b, 4d, 5d. Preferably this should be noted in the LCT descriptions.	Make minor amendments as suggested.	Amend as suggested in representation.
	Page 27 - under 'plan' list - 6th bullet referring to quarries - in addition to landscape character and biodiversity quarry management and restoration plans should also enhance geodiversity.	Comment is noted and agree with and changes are therefore recommended.	Amend as suggested in representation.
	Page 43 & Page 47 - management guidelines for LCTs 2a and 3a both refer to the need to manage water run-off. This is not an issue per-se, but we recommend that the descriptions note the fact that groundwater regimes contribute to the functional setting of the WHS. That is they drive some of the natural cliff processes that in part underpin the WH inscription.	Comment is noted and agree with and changes are therefore recommended.	Amend as suggested in representation.
	Page 77 - what makes it special' paragraph - mentions WHS but also geological SSSIs whereas LCT 4h only mentions habitats as SSSIs. This is unhelpful inconsistency when referring to geological SSSIs, especially in regards to the WHS. Geological SSSIs overlap many of the LCT and are likely found throughout the entire assessment area. We suggest a more consistent way is found to incorporate reference to these statutory conservation designations.	Comment is noted and agree with and changes are therefore recommended.	Amend as suggested in representation.



Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
	General Comment - <i>Each LCT comes with management guidelines with subheadings Protect, Manage and Plan. The need to protect, manage and plan for the conservation of the WHS is very poorly represented in these sections, perhaps most significantly from LCT 4h (cliffs) which includes the area within the boundaries of the WHS itself. Archaeology is listed as a feature to protect and yet the WHS, which is of the absolute highest heritage value, is not. It may be sensible to have a direct conversation with us to discuss how the interests of the WHS can be appropriately and more consistently represented within the LCT descriptions.</i>	Comment is noted and agree with and changes are therefore recommended.	Amend as suggested in representation.
	Page 80/81 - <i>We object to the word 'unsettled' being used as a key characteristic of the cliffs LCT. This carries negative connotations when in fact its 'unsettled' nature is part of its tremendous aesthetic, environmental, heritage and economic value. Suggest changing this to dynamic, changing, active or something similar.</i>	Comment is noted and agree with and changes are therefore recommended.	Amend as suggested in representation.
	Page 82 - <i>under future forces for change - should include a point to complement one made in other LCTs of 'Potential impacts from Coastal Change Management, including accommodating development at risk from coastal erosion'. e.g. Development may increase pressure for more coastal defences, impacting natural processes and conservation and heritage assets such as the SSSIs, SACs and WHS.</i>	Comment is noted and agree with and changes are therefore recommended.	Amend as suggested in representation.
<a href="#">West Hill Parish Council</a>	West Hill Parish Council support the LCA, including in reference to the treed character of the village. They do, however, highlight a couple of typographical errors: “Page 29, 6th bullet point – it should be “West Hill woodland village”, not “West End woodland village”. Page 30, Future forces for change, last bullet point – again should be “West Hill”, not “West End”.	As this reference in the document is somewhat anomalous it is suggested that the bullet point is actually deleted.	Delete bullet pointed text.

## Appendix 2 – Additional proposed changes resulting from assessment of comments received

Whilst Appendix 1 highlights changes made in respect of specific comments received there were a number of comments about the role and application of the LCA that generate the need for additional further recommended changes.

A concern was raised, in respect of the LCA and making planning decisions (including policy choices and determining planning applications) that the LCA was presenting matters in a way that may be interpreted or considered to be the only body of evidence and technical guidance that should apply. This of course is not the case and any decision taken will need to weigh-up all of the relevant planning considerations, be they landscape, other environmental, social or economic when arriving at conclusions. To ensure there is no ambiguity a recommended change is proposed to the document, with a new paragraph, 1.7 to read:

### 1.7 Use of the LCA in decision making

The LCA provides a robust evidential landscape baseline to inform future decisions and does not set out policy and it should be considered as one of a number of material planning considerations when considering any planning matter. It will need to be seen and set alongside wider matters including other environmental, social and economic considerations in the decision making process. In this context Natural English guidance:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/691184/landscape-character-assessment.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/691184/landscape-character-assessment.pdf)

advises: *“The results of a Landscape Character Assessment often form part of an evidence base, for example for a development plan and its policies and allocations, or the baseline for a Landscape Impact and Visual Impact Assessment (LVIA) as part of an Environmental Impact Assessment (EIA) of a proposed development. The information is therefore used in circumstances where the results are subject to public scrutiny and debate, such as at public inquiries or examinations in public”*. References to the sub-heading “Plan” under the heading of “Landscape Management Guidelines” for each landscape character type in the LCA should be read in this context.

Further to this change it is also recommended that:

Throughout the document there are boxes, for each landscape character type, that are titled ‘Landscape Strategy’ these are recommended for should be re-labelled to ‘Landscape Aim/s’ – this highlights that the text in the boxes form aims rather than ‘strategy’ (in this context a strategy is akin to being a policy).

and

Throughout the document, for each landscape character type, there is a heading of ‘Landscape Management and Planning Guidelines’. These should be renamed to read ‘Landscape Guidelines’.

Also document title of document to be called “East Devon and Blackdown Hill Landscape Character Assessment”.

The most significant change to the document is, however, inclusion of a new section called ‘Forces for Change’ (see paragraph 1.6 near to the front of the report). This new section, which incorporates a number of recommended changes to the LCA highlighted in this report, sets out the key activities that may bring about landscape change in the future and provides commentary on these. Specific subject matters that could bring about change that are commented on are;

- Development pressure;
- Renewable Energy;
- Recreation Pressure;
- Rural Lanes (specifically from increased vehicle sizes and activity);
- Declining water and soil quality;
- Agricultural management and habitat connectivity;
- Natural processes (from coastal erosion and also inland away from the coast); and
- Climate change.

It is, however, also highlighted that there are many positive landscape changes taking place.

# East Devon and Blackdown Hills Landscape Character Assessment

March 2019

Agenda page 48

Prepared by **Fiona Fyfe Associates**  
with Countryside & Robin Lines Landscape

on behalf of **Devon County Council; East Devon District Council; East Devon AONB**  
and the **Blackdown Hills AONB**





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The author would like to thank all members of the consultant team, the client team and the many people who have contributed specialist expertise and local knowledge through the consultation process.		B Changes to Landscape Character Types made since last published (2008)	95
All photos in this report have been taken by Fiona Fyfe unless stated otherwise.		<b>Maps</b>	
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## 1.0 Introduction



## 1.1 Context

East Devon and the Blackdown Hills contain a rich diversity of landscapes within which people live, work and enjoy free time. This document facilitates the conservation and enhancement of these landscapes and their distinctive qualities, whilst accommodating people's needs, and responding to changes and pressures.

The Landscape Character Assessment forms an easily understood, comprehensive and widely endorsed framework which will help to shape landscape-based projects across the area. It is not intended to inhibit innovative planning or design, but should aid understanding of how and where positive change could take place without losing distinctive landscape character.

This document is intended to be used on an everyday basis by a wide range of people involved in landscape-related matters, including planners, developers, land managers, AONB staff, recreation and access officers, wildlife and conservation staff and community groups. It will also inform AONB Management Plans and other documents.

## 1.2 Document structure

This document contains four sections. Following this introduction, Section 2.0 explains what a Landscape Character Assessment is, how this document fits within the wider context of the Devon landscape framework, and which Landscape Character Types and Devon Character Areas are found within the Study Area. Section 3.0 describes the project methodology, and the stages of consultation undertaken. Section 4.0 presents a series of profiles which describe the various Landscape Character Types within the Study Area, and provides guidelines for their protection and enhancement.

## 1.3 The Study Area

The Study Area covers 984km<sup>2</sup> and is shown on Map 1. It comprises

the whole of East Devon District (which contains East Devon AONB), plus the entirety of the Blackdown Hills AONB including the parts within Taunton Deane, South Somerset and Mid Devon Districts.

## 1.4 Commissioning

This document was commissioned in April 2018 by East Devon District Council, Devon County Council and the Blackdown Hills and East Devon AONB Teams. Representatives from these organisations formed the project Steering Group. The Consultant Team was led by Fiona Fyfe Associates, with mapping by Countryscape

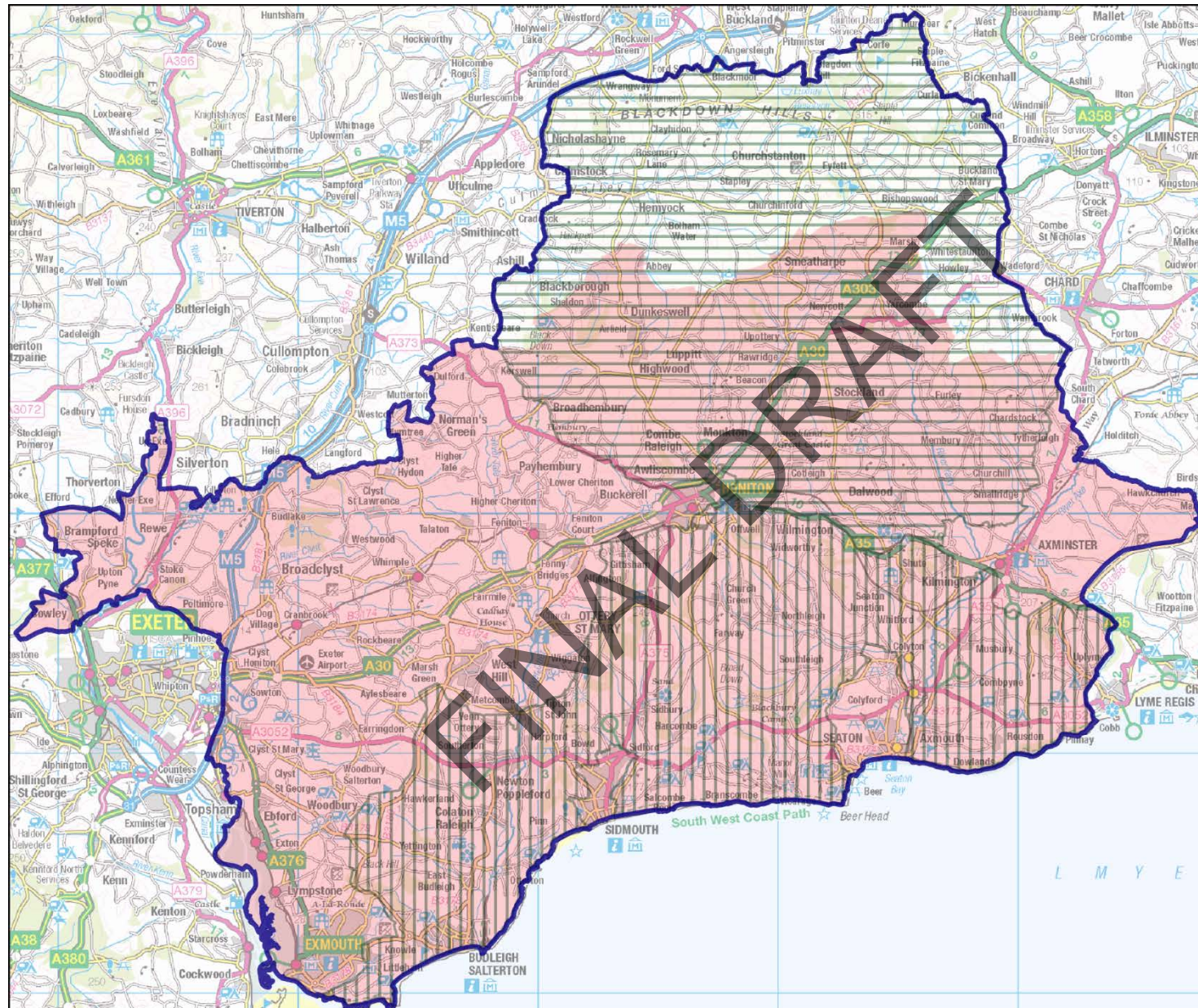
## 1.5 Why an updated Assessment is needed

This Assessment updates the 2008 Landscape Character Assessment which covered the same area. The update was needed because:

- Some significant landscape changes have taken place since 2008 (e.g. development of Cranbrook, and construction of solar farms).
- The delivery mechanisms for landscape management have changed in the last 10 years.
- Concepts such as Green Infrastructure have become mainstream.
- After 10 years it is necessary to review the location, description and management guidelines for each Landscape Character Type. New visions and priorities are required for the area's landscapes reflecting current circumstances and threats (e.g. Ash Dieback).
- Some inconsistencies had been identified in the 2008 Assessment, which needed to be checked and corrected where necessary.
- New Landscape Character Types have been added to the Devon Menu (see Section 2.4) in the intervening years, and additional landscape character assessment work subsequently done in the Study Area (particularly associated with the Greater Exeter Strategic Plan) needed to be incorporated.

## East Devon and AONBs Landscape Character Assessment Update

Map 1: The Study Area  
March 2019



0 1 2 3 4 5 km

- Study Area
- East Devon District
- Blackdown Hills AONB
- East Devon AONB

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## 1.6 Forces for Change

There are many different forces for change acting on the landscape of East Devon and the Blackdown Hills. Some are natural processes whilst others are man-made. Some are single, large-scale changes, whilst others are smaller incremental changes which can add up to create a major alteration in the landscape. Forces for change may be negative or positive, and many are exacerbated by climate change and associated sea level rise. They may impact on the local economy, and on the health, safety and wellbeing of local people.

This section provides a general summary of the changes affecting the landscape of the area. Landscape Character Type (LCT) profiles in Part 4 describe specific landscape changes associated with particular LCTs.

### Development pressure

Like much of the rest of the country, East Devon is facing high pressure for new housing, particularly around Exeter. Cranbrook New Town, in the Clyst Valley, is currently under construction. As well as housing, there is demand for land for employment and infrastructure (such as the Skypark), and new/ upgraded roads to service new developments. New housing developments also incorporate associated green spaces and Green Infrastructure, which may result in land use change from agriculture to recreation and nature conservation. New developments and their associated infrastructure can also impact on dark skies and increase air, water, noise and light pollution.

### Renewable Energy

Reducing the use of fossil fuels to generate electricity results in increased demand for alternative renewable energy sources. Within the study area there are a number of solar farms, and a small number of domestic-scale wind turbines. Biocrops such as miscanthus, grown as fuel for bio-fuel power plants, are becoming more apparent in the

landscape. The area is crossed by a number of National Grid powerlines, with additional overhead or buried lines required to connect new electricity generating sites.

### Recreation Pressure

East Devon and the Blackdown Hills are a popular tourist destination. However, there is a risk that recreation pressure destroys the qualities which people come to enjoy. Popular paths, including long-distance routes and those close to settlements, may suffer from erosion and widening. Litter and anti-social behaviour can be a problem, particularly at 'honeypot' sites. Increased numbers of visitors, including those from the rising local population, increases the recreation pressure on the area. Recreation patterns and activities may be affected by future changes in vegetation, particularly loss of shade.

### Rural Lanes

Narrow lanes, often running between high banks, are a distinctive feature of many parts of East Devon and the Blackdown Hills. However, verges, hedgebanks and bridges are vulnerable to damage by wide vehicles, particularly farm vehicles which are increasing in width. The character (and safety) of lanes is affected by increased traffic, especially vehicles driving at speed. Following heavy rain, some lanes channel water run-off from surrounding fields, resulting in damage to verges, banks and tarmac, and the creation of pot-holes.

### Declining water and soil quality

Pollution of water courses, particularly as a result of farming practices, is a major problem. In addition, increased areas of land ploughed or developed (particularly in flood plains) results in faster discharge into rivers, and greater flood risk. Run-off of soil into rivers not only reduces water quality and causes silting; it also reduces the fertility of the land to grow crops in the future.

### Agricultural management and habitat connectivity

Increasing intensity of agricultural production has resulted in a loss of wildlife habitats such as field margins, scrub and parkland. Changing farming practices, particularly reduced numbers of outdoor livestock, means that fewer hedgerows are now required to be stockproof, and may therefore become gappy and dilapidated. Loss of field margins and hedgerows results in reduced connectivity of wildlife habitats such as woodlands and grasslands, impacting on species diversity and numbers of insects, birds and mammals.

### Natural processes

Coastal erosion is a natural process, driven in part by surface water and groundwater patterns, as well as erosion by the sea. As cliffs retreat inland 'coastal squeeze' of clifftop habitats such as grassland may occur. Away from the coast, other natural processes include regeneration of scrub and woodland, and the spread of a wide range of pests and diseases affecting trees, plants and animals. Ash dieback is a particular current cause for concern, and over coming years will impact on woodland composition, habitats and views across the wider landscape.

### Climate change

Several of these natural processes will be exacerbated by climate change. Associated sea level rise will increase rates of coastal erosion and flood risk. Cliff erosion will displace coastal land uses, and impact on archaeology. Resulting increased demand for sea defences will have visual impacts, and will also affect natural coastal processes and designated sites. Changing weather patterns and increased storm events will impact on crop choices (e.g. apples need cold winters), and also on tree species (e.g. beech trees are drought intolerant). Wildfires are likely to become more frequent. Landscape changes may also occur from mitigation measures such as new woodlands or wetlands.

### Positive changes and interventions

Throughout East Devon and the Blackdown Hills there are many positive landscape changes taking place. Natural Flood Management (NFM) schemes are addressing issues of flooding, water pollution and soil loss. The AONBs, World Heritage Site, estuaries and other designated sites have Management Plans in place to guide positive landscape change. The Clyst Valley is being enhanced through Green Infrastructure measures associated with new development, and Suitable Accessible Natural Greenspace (SANG) sites are being provided to mitigate adverse impacts that would otherwise occur from recreational pressure on the Pebblebed Heaths and Exe Estuary protected sites.

## 1.7 Use of the Landscape Character Assessment in decision-making

The LCA provides a robust evidential landscape baseline to inform future decisions and does not set out policy. It should be considered as one of a number of material planning considerations when considering any planning matter. It will need to be seen and set alongside wider matters including other environmental, social and economic considerations in the decision making process. In this context [Natural England Guidance](#) advises: *"The results of a Landscape Character Assessment often form part of an evidence base, for example for a development plan and its policies and allocations, or the baseline for a Landscape Impact and Visual Impact Assessment (LVIA) as part of an Environmental Impact Assessment (EIA) of a proposed development. The information is therefore used in circumstances where the results are subject to public scrutiny and debate, such as at public inquiries or examinations in public".*

References to the sub-heading "Plan" under the heading of "Landscape Management Guidelines" for each landscape character type in the LCA should therefore be read in this context.

## 1.8 Relationship to other documents

This Landscape Character Assessment gathers together key information from a wide variety of sources into a single manageable document. If more detailed information is required on any topic, then the original source documents should be consulted. The Landscape Character Assessment should therefore be read in conjunction with the following documents:

[Blackdown Hills AONB Management Plan](#)

[East Devon AONB Management Plan](#)

[East Devon Local Plan](#)

[Greater Exeter Strategic Plan](#)

[Neighbourhood Plans](#)

[Blackdown Hills Building Design Guidance](#)

[Green Infrastructure Strategies](#)

[Axe Estuary Marine Conservation Zone Factsheet](#)

[Otter Estuary Marine Conservation Zone Factsheet](#)

[Exe Estuary Management Plan and Guidance Notes](#)

[Devon Biodiversity Action Plan](#)

[Devon trees, hedgerows and woodland guidance](#)

[East Devon AONB Historic Environment Action Plan](#)

[Devon Historic Environment Record](#)

[Blackdown Hills 'What Makes a View?'](#)

[National Character Area Profile 147: Blackdowns](#)

[National Character Area Profile 148: Devon Redlands](#)

[Jurassic Coast WHS Management Plan](#)

[Devon Minerals Plan](#)

[Devon Waste Plan](#)

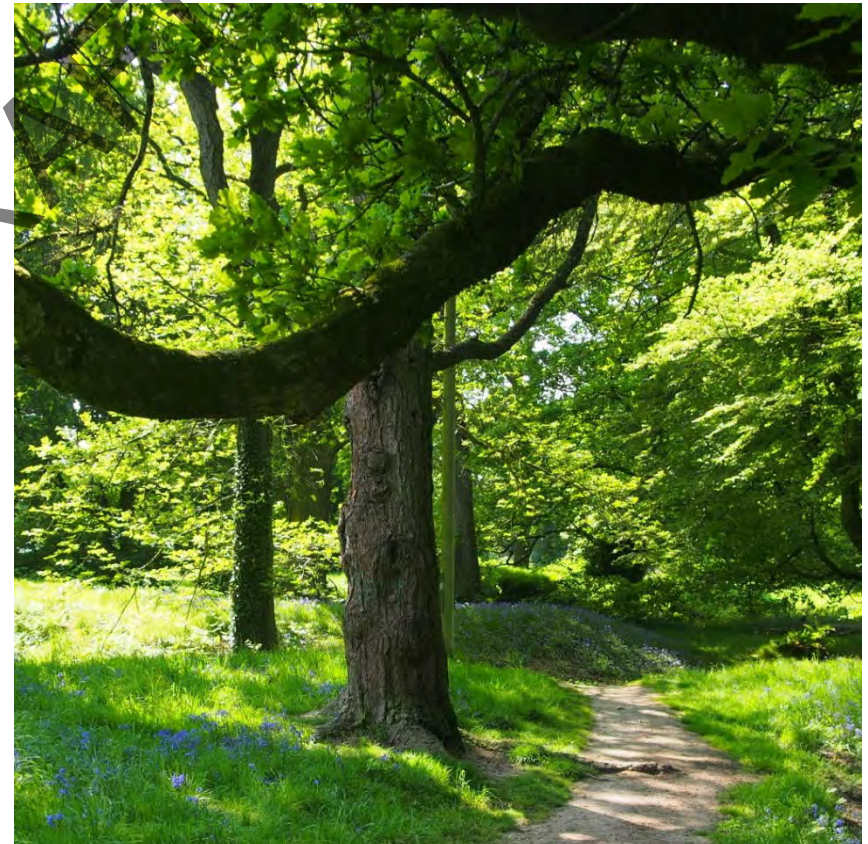
[Somerset Minerals Plan](#)

[Somerset Waste Core Strategy / Waste Plan](#)

[Taunton Dene Local Plan and Core Strategy](#)

[South Marine Plan](#)

[South Marine Plan Technical Annexes](#)



Bluebells in oak/beech woodland at Castle Neroche Iron Age Hillfort, Blackdown Hills Scarp DCA; Steep Wooded Scarp Slopes LCT (See Section 2.3 for an explanation of DCAs and LCTs)



## 2.0 The Devon-wide Landscape Character Assessment Framework

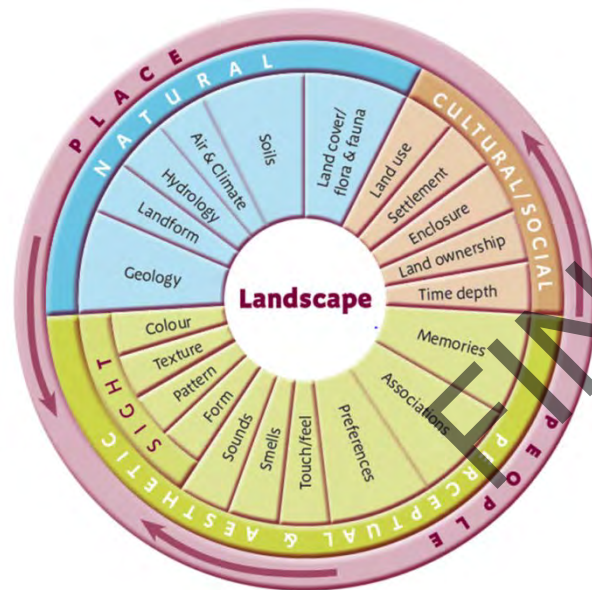


## 2.1 Defining 'Landscape'

The European Landscape Convention (ratified by the UK in 2007 and not affected by Brexit) provides a broad definition of 'landscape':

*Landscape is an area of land, as perceived by people, whose character is the result of the action and interaction of natural and/ or human factors...<sup>1</sup>.*

The following diagram explains the different elements of landscape which capture its natural, cultural and perceptual qualities<sup>2</sup>. All are considered when undertaking a Landscape Character Assessment.



The concept of landscape character is embedded in the planning system (including the National Planning Policy Framework) and has been used in the UK for many years to inform the management of change and to deliver sustainable development.

*Landscape Character Assessment is a tool to help understand what the landscape is like today, how it came to be like that, and how it may change in the future. Its role is to help ensure that change and development does not undermine whatever is characteristic or valued about any particular landscape.<sup>3</sup>*

The process of Landscape Character Assessment requires desk studies, fieldwork, writing-up and consultation, as described in Section 3.0. It seeks to identify the distinct and recognisable patterns of physical, cultural and perceptual elements in the landscape that make one landscape different from another, rather than better or worse.

To do this, it identifies distinctive Landscape Character Types (LCTs) and Landscape Character Areas (LCAs). Landscape character assessments can be undertaken at a range of scales and levels of detail, from National to Local.

## 2.3 National Character Areas (NCAs) within the Study Area

There are two NCAs within the Study Area. The *Blackdown Hills* (NCA 147) covers the eastern part, broadly to the east of Sidmouth. The area to the west of Sidmouth is in NCA 148 *Devon Redlands*.

## 2.2 Landscape Character Assessment

<sup>1</sup> European Landscape Convention, Council of Europe 2000 p. 9

<sup>2</sup> An Approach to Landscape Character Assessment (Natural England, 2014) p. 9

<sup>3</sup> Landscape Character Assessment Guidance for England and Scotland (Countryside Agency and Scottish Natural Heritage, 2002)

## 2.4 The Devon Landscape Framework

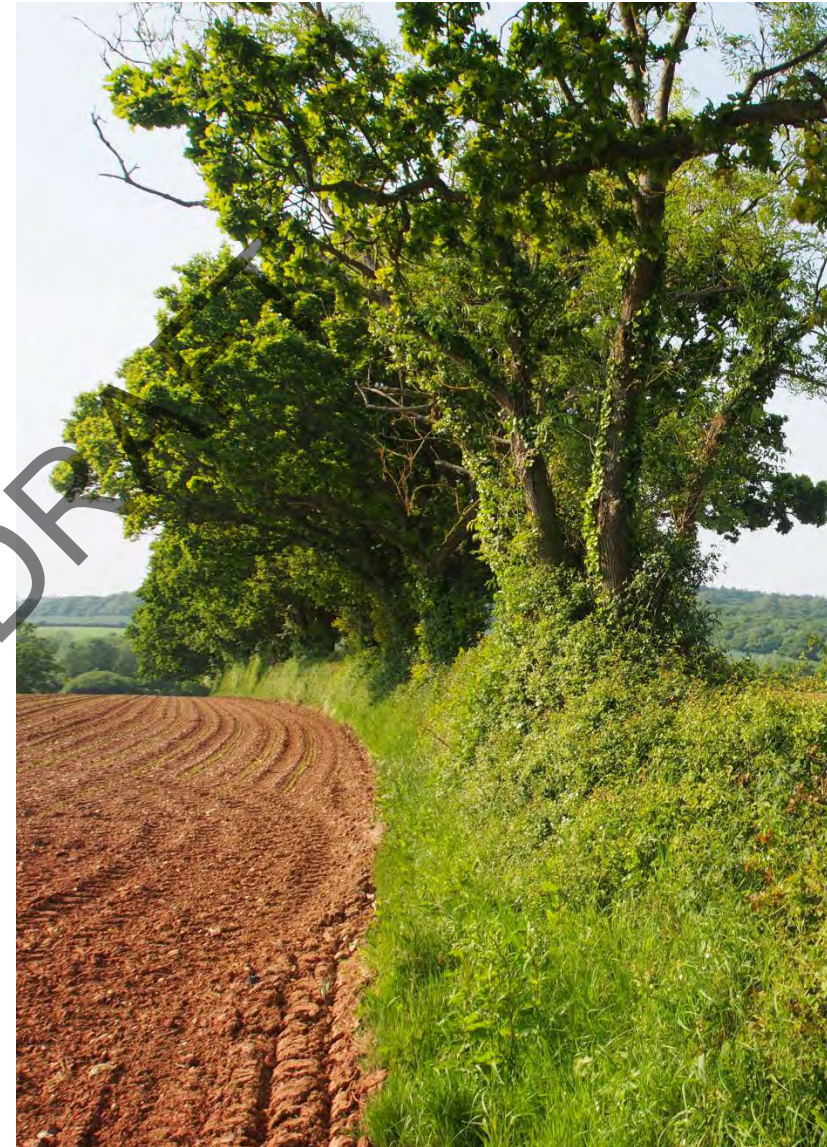
Devon has a comprehensive suite of Landscape Character Assessments, into which this document fits. These describe Devon's landscapes, and define a series of Landscape Character Types (LCTs) and Devon Character Areas (DCAs) within the County.

See <https://new.devon.gov.uk/planning/planning-policies/landscape/devons-landscape-character-assessment>

**Landscape Character Types (LCTs)** are generic types of landscape which can occur in different places. They have similar characteristics wherever they occur, and are called by a descriptive name (e.g. Estuaries, Moorland Edge Slopes, Settled Valleys). 52 different LCTs have been defined across Devon. Together they make up the 'Devon Menu' of LCTs. Their descriptions (in documents such as this one) highlight LCTs' key characteristics.

**Devon Character Areas (DCAs)** are geographically unique areas, each with a distinctive 'sense of place'. They are often formed of groups of LCTs, and are called by a descriptive place-based name (e.g. Taw-Torridge Estuary; East Dartmoor Moorland Fringes; Axe Valley). Their descriptions (within the Devon Landscape Assessment) emphasise local identity and visual and perceptual influences.

Low detail	National	There are seven National Character Areas (NCAs) within Devon, providing a 'snapshot' of the landscape diversity within the County
Med. detail	Devon-Wide	The Devon Landscape Assessment describes the 68 DCAs within Devon District/ Unitary Authority/ AONB/ National Park Assessments describe the 52 different LCTs which combine to create the DCAs.
High detail	Local	Some areas of Devon have local assessments of smaller landscape units which break down LCTs into more detail.



Hedgebank near Ashclyst Forest  
Clyst Lowland Farmlands DCA; Lowland Plains LCT



## 2.5 Devon Character Areas (DCAs) within the Study Area

There are twelve Devon Character Areas within the Study Area, as shown on Map 2. Each comprises several LCTs, and has a distinctive sense of place.

Full details about all the DCAs may be found on the Devon County Council website, following the link on the preceding page. From here can be accessed a profile for each DCA comprising:

- Example photograph
- Description
- Constituent LCTs
- National Character Area
- Distinctive Characteristics
- Special Qualities and Features
- Forces for change and their landscape implications (past, current and future)
- Overall strategy
- Guidelines (Protect, Manage and Plan)

The relevant DCA profiles should be read in conjunction with the LCT descriptions within this Landscape Character Assessment. The DCAs are cross-referenced within the LCT profiles.

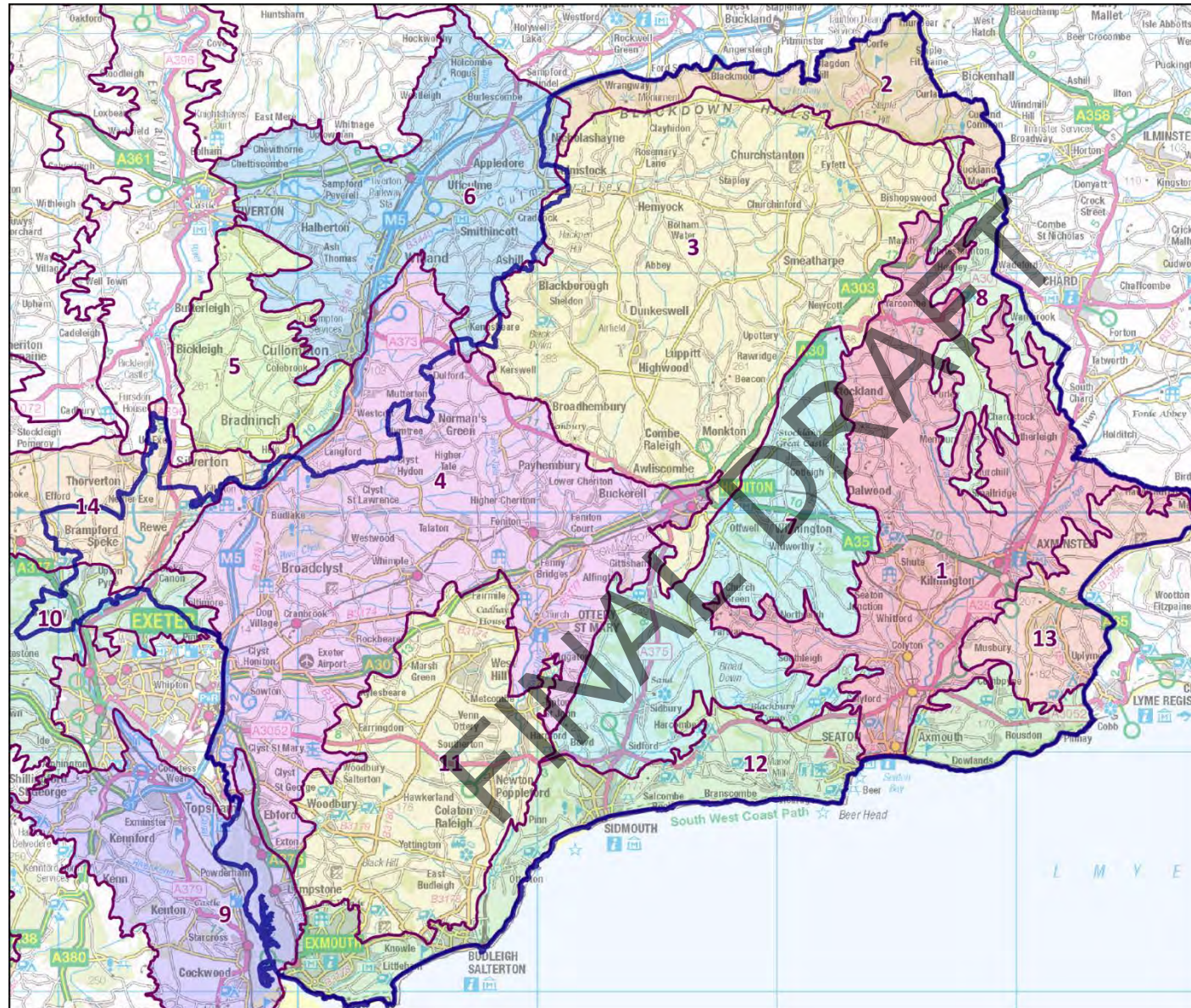
The twelve Devon Character Areas within the Study Area are:

Axe Valley  
Blackdown Hills  
Blackdown Hills Scarp  
Clyst Lowland Farmlands  
East Devon Central Ridge  
Eastern Blackdown Ridge  
Exe Estuary and Farmlands  
Exeter Slopes and Hills  
Pebble Bed Heaths and Farmland  
Sidmouth and Lyme Bay Coastal Plateau  
Wooton Hills  
Yeo, Culm and Exe Lowlands



*Cliffs east of Sidmouth,  
Sidmouth and Lyme Bay Coastal Plateau DCA; Cliffs LCT*





## East Devon and AONBs Landscape Character Assessment Update

Map 2: Devon Character Areas  
within and adjacent to the  
Study Area

March 2019



0 1 2 3 4 5 km

- Study Area
- Devon Character Areas

Label	Name
1	Axe Valley
2	Blackdown Hills Scarp
3	Blackdown Hills
4	Clyst Lowland Farmlands
5	Cullompton Rolling Farmland
6	Culm Valley Lowlands
7	East Devon Central Ridge
8	Eastern Blackdown Ridge
9	Exe Estuary and Farmlands
10	Exeter Slopes and Hills
11	Pebble Bed Heaths and Farmland
12	Sidmouth and Lyme Bay Coastal Plateau
13	Wootton Hills
14	Yeo, Culm and Exe Lowlands

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## 2.6 Landscape Character Types (LCTs) within the Study Area

There are 17 LCTs within the Study Area, shown on Map 3. These cover a wide variety of coastal, upland and lowland landscapes, as follows:

### LCT 1: PLATEAUX AND RIDGES

- LCT 1A: Open inland planned plateaux
- LCT 1B: Open coastal plateaux
- LCT 1C: Pebblebed heaths
- LCT 1D: Estate wooded ridges and hilltops
- LCT 1E: Wooded ridges and hilltops

### LCT 2: SCARP SLOPES

- LCT 2A: Steep wooded scarp slopes

### LCT 3: VALLEYS

- LCT 3A: Upper farmed and wooded valley slopes
- LCT 3B: Lower rolling farmed and settled valley slopes
- LCT 3C: Sparsely settled farmed valley floors
- LCT 3E: Lowland plains
- LCT 3G: River valley slopes and combes
- LCT 3H: Secluded Valleys

### LCT 4: COASTS

- LCT 4A: Estuaries
- LCT 4B: Marine levels and coastal plains
- LCT 4D: Coastal slopes and combes
- LCT 4H: Cliffs

### LCT 5: ROLLING HILLS

- LCT 5: Estate wooded farmland

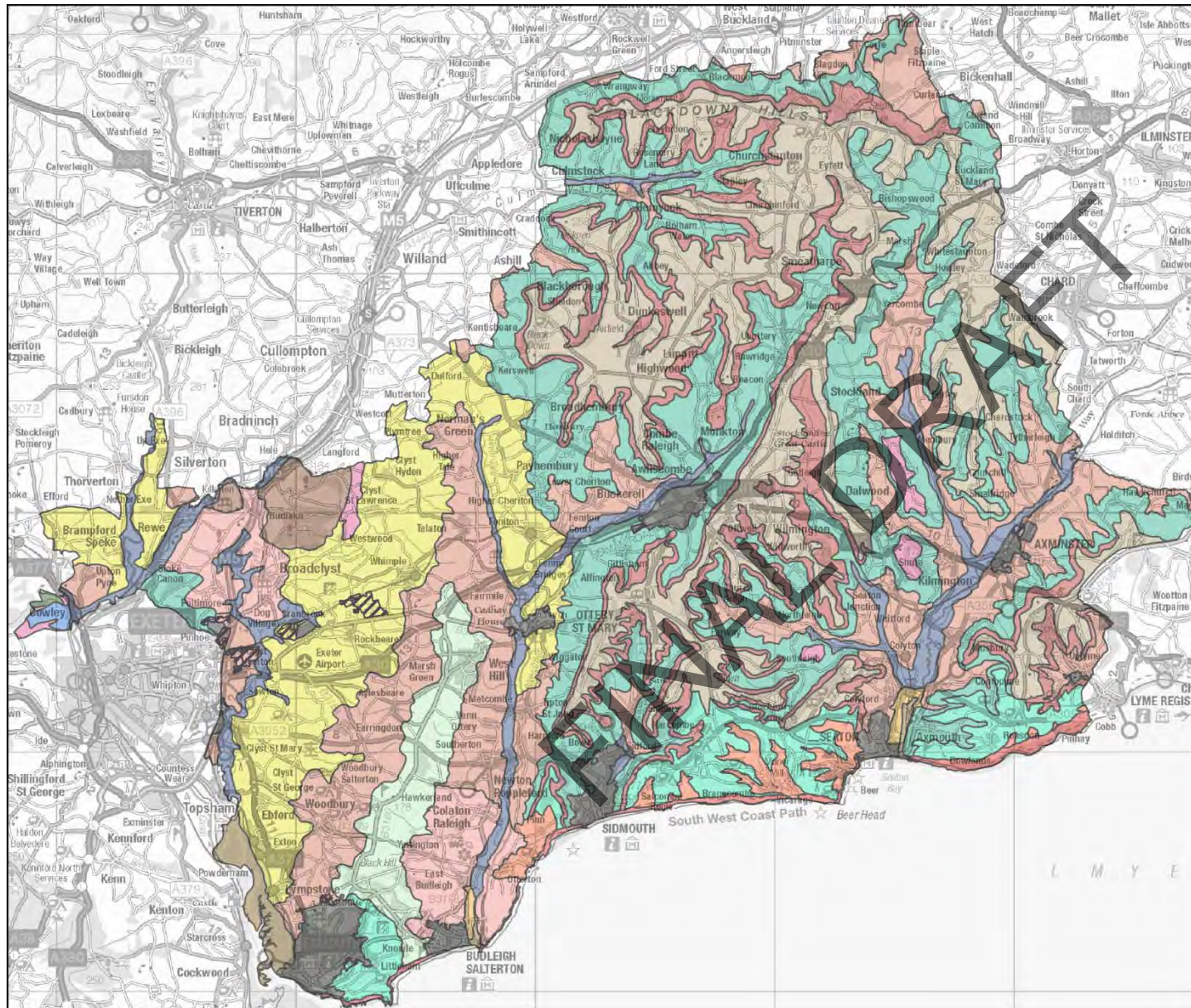
It is important to note that the boundaries between DCAs or between LCTs are rarely abrupt. It is more usual to have a 'zone of transition' between them where the landscape character gradually changes. The boundary lines have been drawn at an appropriate point within this zone of transition.

Therefore, if a site or area is close to a boundary, it is important to understand the characteristics and guidelines for each of the nearby LCTs/ DCAs, and to take them into account.

LCTs often have consistent relationships. For example, Scarp Slopes are found below Plateaux, and Lowland Plains are found adjacent to Valley Floors. These relationships help to create the wider context of landscapes within the Study Area. None exist in isolation, and it is important to remember this when considering the impacts of development or landscape management projects. Different LCTs are also linked by the views they have of each other. The illustrations on the following pages show how different LCTs relate to each other in various parts of the Study Area.

Section 4.0 contains a series of profiles, one for each of the LCTs within the Study Area. Each profile begins with a description of its landscape character, including a summary description, 'typical view' photograph, location map, key characteristics and an explanation of what makes the landscape special. This is followed by an outline of the forces for change affecting the LCT. Each profile concludes with landscape aims and guidelines. These address the forces for change and aim to retain and enhance the distinctive character of the LCT as described at the start of the profile.

For a more detailed map of LCTs, which can be zoomed to the desired level of detail, please see the [Devon County Council Environment Viewer](#).



## East Devon and AONBs Landscape Character Assessment Update

Map 3: Landscape Character Types (LCTs)  
within the Study Area

March 2019



0 1 2 3 4 5 km



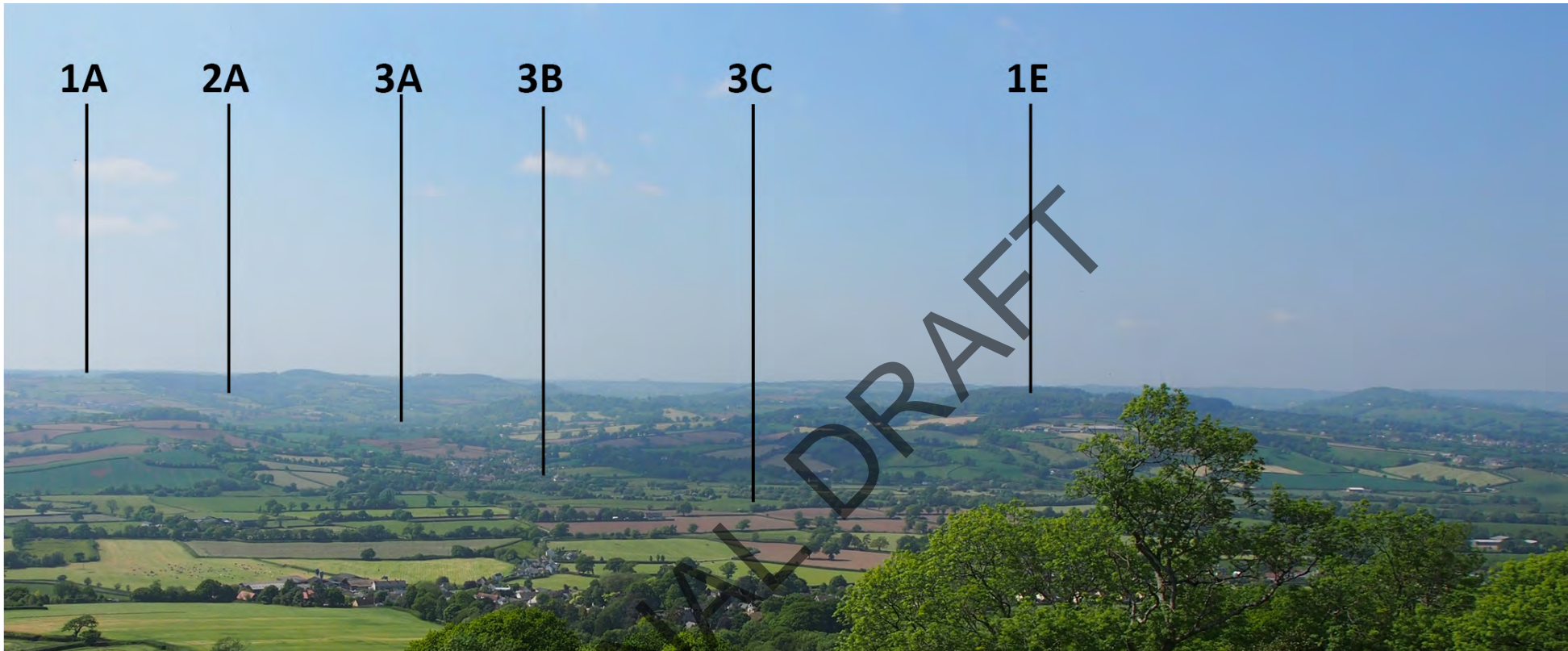
### Landscape Character Types

- 1A. Open inland planned plateaux
- 1B. Open coastal plateaux
- 1C. Pebblebed heaths
- 1D. Estate wooded ridges & hilltops
- 1E. Wooded ridges and hilltops
- 2A. Steep wooded scarp slopes
- 3A. Upper farmed and wooded valley slopes
- 3B. Lower rolling farmed and settled valley slopes
- 3C. Sparsely settled farmed valley floors
- 3E. Lowland plains
- 3G. River valley slopes and combes
- 3H. Secluded valleys
- 4A. Estuaries
- 4B. Marine levels and coastal plains
- 4D. Coastal slopes and combes
- 4H. Cliffs
- 5D. Estate wooded farmland
- 7. Main cities and towns

Allocated Sites in East Devon

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*View west from Musbury Hill across the Axe Valley, showing how LCTs relate to each other*

*LCT 1A: Open inland planned plateaux*

*LCT 2A: Steep wooded scarp slopes*

*LCT 3A: Upper farmed and wooded valley slopes*

*LCT 3B: Lower rolling farmed and settled valley slopes*

*LCT 3C: Sparsely settled farmed valley floors*

*LCT 1E: Wooded ridges and hilltops*



*View east from Pinhoe, north of Exeter, showing how LCTs relate to each other*

*LCT 1D: Estate wooded ridges and hilltops*

*LCT 3C: Sparsely settled farmed valley floors*

*LCT 5D: Estate wooded farmland*

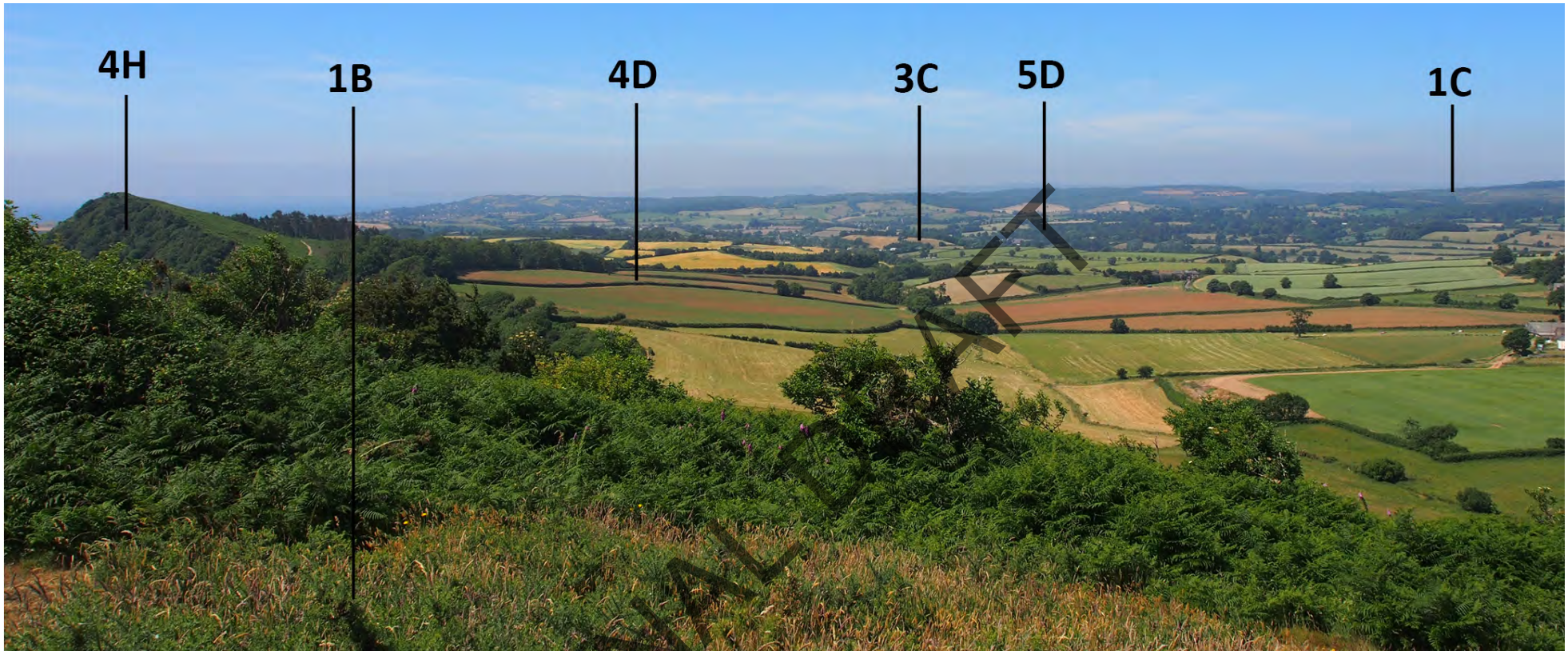
*LCT 3E: Lowland plains*

*LCT 1A: Open inland planned plateaux*

*LCT 3B: Lower rolling farmed and settled valley slopes*

*LCT 1C: Pebblebed Heaths*





View west from Mutters Moor, on the South West Coast Path west of Sidmouth, showing how LCTs relate to each other

LCT 4H: Cliffs

LCT 1B: Open coastal plateau

LCT 4D: Coastal slopes and combes

LCT 3C: Sparsely settled farmed valley floors

LCT 5D: Estate wooded farmland

LCT 1C: Pebblebed heaths



## 3.0 Methodology and Consultation

Agenda page 66

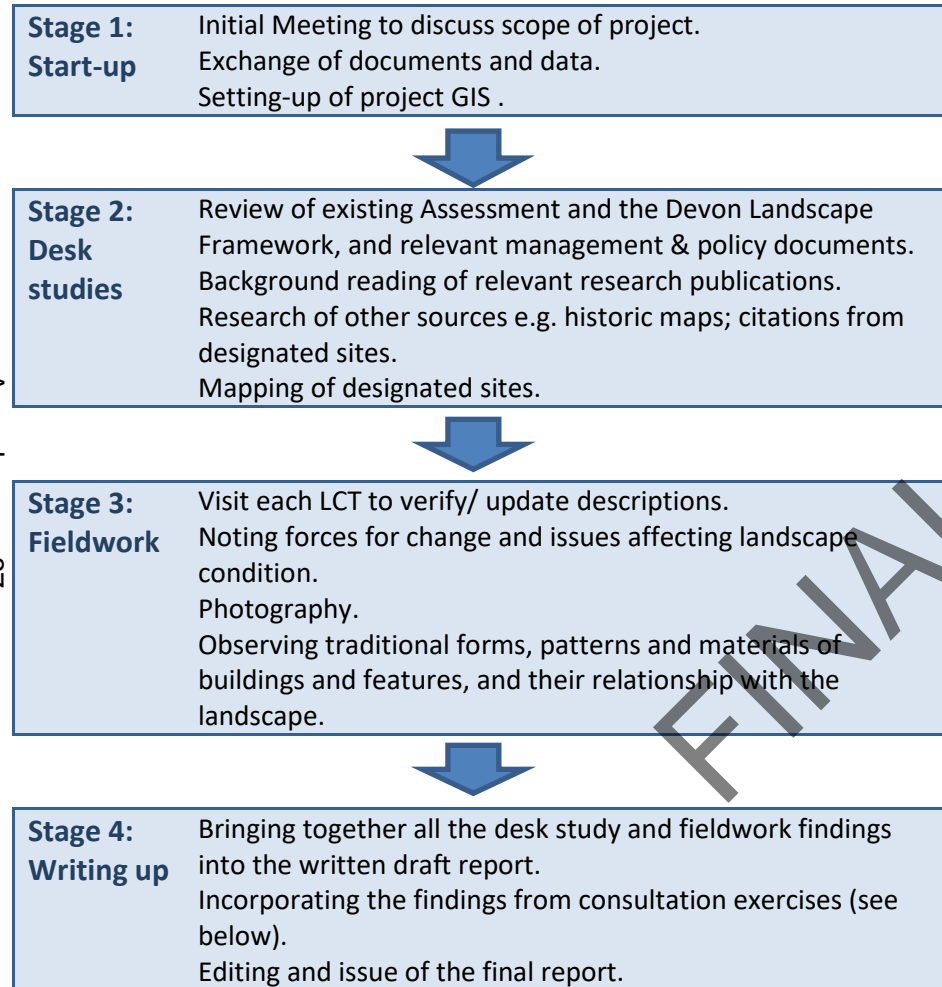
Sidbury village

East Devon Central Ridge Devon Character Area



### 3.1 Stages of the Methodology

The project methodology followed the approach set out in the current Best Practice Guidelines for Landscape Character Assessment<sup>4</sup>. It can be divided into four stages, as shown:



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<sup>4</sup> An Approach to Landscape Character Assessment (Natural England, 2014)

### 3.2 Consultation

Two key phases of consultation took place during the course of the assessment. The first phase took place between the fieldwork and write-up stages, and took the form of a **stakeholder consultation workshop**, attended by a wide range of stakeholders and local experts. Invitees who were unable to attend in person were invited to complete questionnaires to comment on the distinctive qualities of the area's landscapes, identify forces for change, and contribute management recommendations. Specific advice was also sought from individuals with particular areas of expertise.

Staff from the following organisations took part in the workshop or returned questionnaires:

- Devon County Council
- Somerset County Council
- East Devon District Council
- Mid Devon District Council
- East Devon AONB Partnership
- Blackdown Hills AONB Partnership
- Forestry Commission
- Marine Management Organisation
- Federation of Small Business
- Jurassic Coast World Heritage Site
- Devon Wildlife Trust
- Devon Access Forum

The **public consultation** on the draft document took place in January-February 2019, co-ordinated by East Devon District Council. Comments received have informed this final version.

**Note:** The project brief did not include a requirement for a full on-the-ground review of all LCT boundaries. However, where improvements to LCT boundaries were noticed as a result of fieldwork or consultation, these changes were made, and are recorded in Appendix B.



## 4.0 Landscape Character Type Profiles

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*The mouth of the River Otter, Budleigh Salterton  
Sidmouth and Lyme Bay Coastal Plateau Devon Character Area*

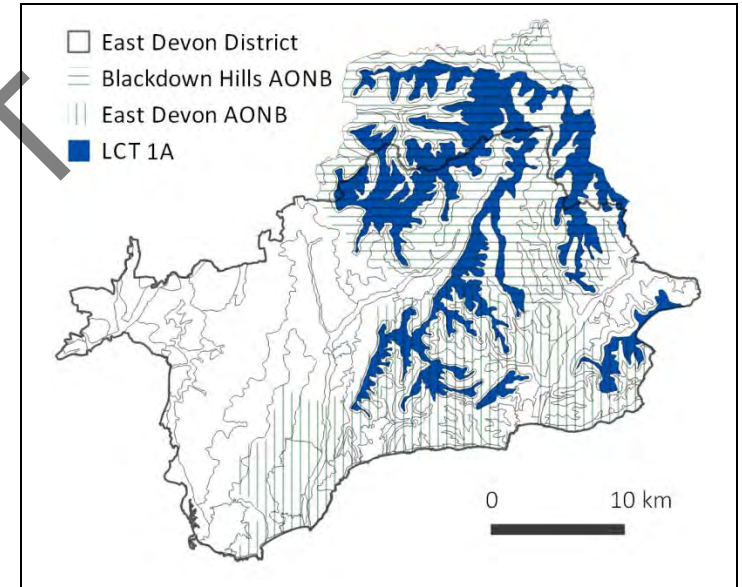


## LCT 1A: Open Inland Planned Plateaux

**Devon Character Areas containing this LCT: Blackdown Hills; Eastern Blackdown Ridge; East Devon Central Ridge; Wootton Hills**



*A typical view across the LCT 1A near Smeatharpe Airfield  
Blackdown Hills Devon Character Area*



### Description

This LCT occurs in the eastern half of the Study Area, and contains some of the highest land. It comprises a series of elevated fingers of land which are flat or gently undulating. The boundaries of the LCT are generally clearly marked by the transition to steep scarp slopes below (LCT 2A). This is a relatively simple landscape, with strong horizontal elements: flat horizons, straight roads and regular field boundaries. Vertical features, such as lines of roadside trees and electricity poles, are particularly noticeable. The simple landscape pattern reflects its late enclosure from common land. Settlement is sparse, and mostly occurs around crossroads, although there is more extensive 20<sup>th</sup> Century development associated with airfields. Archaeological features include prehistoric burial mounds, hillforts and beacon sites, and historic routes along ridge tops. There are occasional long views out over surrounding landscapes, particularly from the edges of the plateaux, some of which are associated with historic beacon sites.

## Key Characteristics

**Note:** **Bold** text indicates a Devon-wide characteristic. Not bold indicates a local characteristic

- **High, open flat plateaux** comprising a series of long, narrow ridge tops, sometimes undulating. Little surface water.
- **Occasional copses and conifer plantations punctuate the open farmland.** Boundary trees along roads and hedgerows mostly beech in north, and oak/ hazel further south and around plateaux edges.
- **Predominantly pastoral farming on heavy soils,** with some arable. **Regular, medium-large scale fields bounded by well-trimmed hedges on narrow earth banks.**
- Semi-natural habitats include patches of heath, unimproved grassland and wide verges.
- Archaeology and cultural heritage includes prehistoric barrow cemeteries, Iron Age hillforts, later beacon and military sites.
- **Settlement generally comprises isolated farmsteads and clusters of buildings at crossroads. 20<sup>th</sup> Century settlement associated with airfields.**
- **Long, straight roads in the centre of ridges,** often lined with beech avenues, **with narrower, winding roads towards the edges.** Few public rights of way.
- **A very uniform appearance,** with a simple landscape pattern and often a fairly large scale.
- **Extensive views often blocked by woodland on boundary or roadside trees,** but occasional long views. Wellington Monument, Gittisham masts and Stockland transmitter are landmarks.



*Heathland, prehistoric barrows and landmark communications masts at Gittisham Hill*



*The Wellington Monument is a prominent landmark over a wide area, and a rare example of a 3-sided obelisk.*

## What Makes this Landscape Special

A relatively **simple landscape** dominated by straight lines, often contrasting with the irregular patchwork of fields and wooded landscapes which surround it.

Its high land forms the **horizons** in many views from the surrounding area.

Important surviving **archaeological features relating to prominent hilltop sites**, including Farway prehistoric barrow cemetery, Culmstock Beacon and the Wellington Monument.

Extensive **heathland habitats** at Gittisham and pockets of heathland and wet grassland elsewhere.



## Forces for change acting on this LCT

### Past and current forces for change

- Wires, pylons and masts appearing prominently on the skyline in views from this LCT and surrounding areas.
- Large-scale development associated with airfield sites, particularly around Dunkeswell.
- Solar farms (although existing sites within this LCT are generally well-integrated into the landscape, and are not visually prominent).
- Plastic crop covers.
- Closure of dairy farms, particularly smaller ones.
- Signage and measures to reduce speeding on straight roads.
- Positive management of archaeological and heathland sites, and restoration of the Wellington Monument.
- Positive management of roadside and field boundary hedges.

### Future forces for change

- Ash Dieback resulting in loss of ash trees.
- Loss of beech trees due to drought associated with climate change.
- Changes in crop choices in response to market forces (such as demand for biomass crops).
- Increased cutting of silage, potentially resulting in loss of stockproof field boundaries.
- Future changes in agricultural grants, which are likely to impact on landscape management.
- Continued demand for communications masts.
- Possible improvements to A30/ A303 potentially increasing its impact within the landscape.

### Landscape Aims

The simple, regular pattern of the landscape is retained. Skylines and plateau edges should be kept clear of intrusive development, and communications masts sited with care to have minimal impact. Biodiversity should be enhanced through continued positive management of heathland, grassland and woodland/ plantation habitats. Archaeological sites should be protected from erosion and damage, and key views from them should be kept open.



*New industrial buildings adjacent to Dunkeswell Airfield*



*Solar Farm east of Axminster.*



*Grassland SSSI in positive management*

## Landscape Guidelines

### Protect

- Archaeological sites, taking particular care to keep earthworks clear of bracken and scrub.
- Skylines, particularly where they form the backdrop to views from a wide area. Plateau edges can be particularly prominent locations as they are seen from the valleys below.
- The relatively simple, regular landscape pattern.

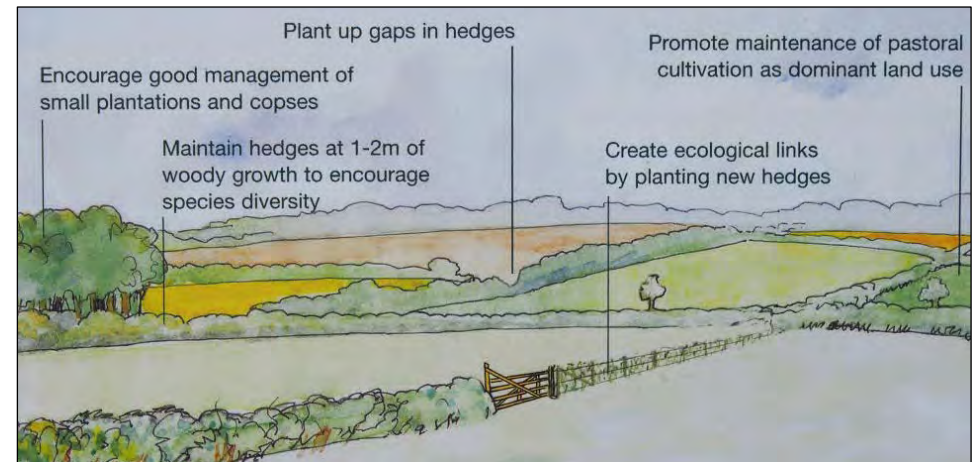
### Manage

- Viewpoints, enabling public access where possible, and ensuring that vegetation at the top of the scarp slopes does not grow too high and restrict views.
- Roadside avenues and hedgerow trees, replacing trees where necessary to ensure their continuity in the landscape.
- Woodland, identifying opportunities to link woodland, and also areas for potential extensive woodland planting using local seed. Retain and manage estate woodlands and coverts.
- Hedgerows, gapping-up where necessary to retain the landscape pattern and enhance habitat connectivity. Support local hedge-laying groups.
- Areas of heath and wet pasture, removing encroaching scrub.

### Plan

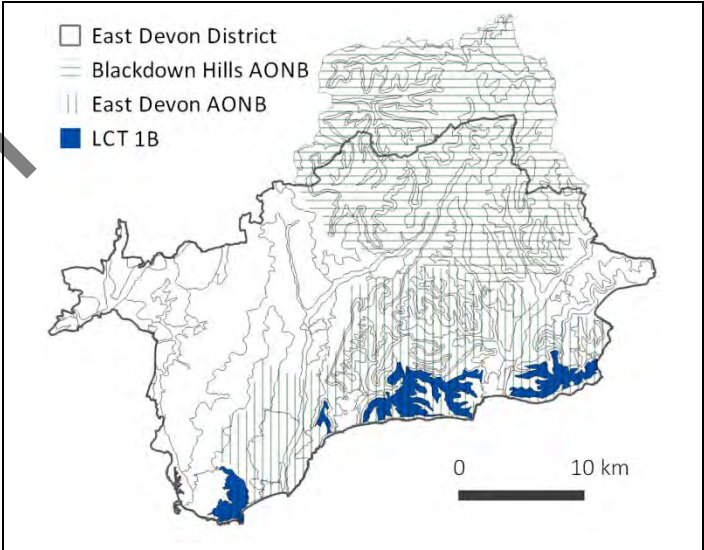
- Protect the rural character of skylines by keeping built development away from plateau edges.
- Create/ enhance safe public rights of way to enable access to sites of interest, and links with wider Green Infrastructure aspirations.
- Consider undergrounding overhead wires where particularly intrusive.
- Work with highways authority to control traffic speeds without intrusive signage.

- Respect the general pattern of settlement, comprising dispersed farms and dwellings, and hamlets around crossroads.
- Any expansion of larger settlements/ developed areas should include strengthening of development edges through sympathetic planting (e.g. beech hedgerows and avenues).
- Promote sensitive conversion of redundant farm buildings to appropriate new uses (e.g. affordable housing; small business units; tourist accommodation).
- Locate masts against a wooded backdrop where possible, or use planting to avoid them appearing as isolated features on horizons.
- Exercise care when selecting materials for industrial developments to ensure best integration into the landscape.
- Continue to ensure that solar farms are well-integrated into the existing hedgerow structure, and are not visible from above.
- Develop a long-term plan for conifer plantations reaching maturity, identifying areas suitable for replanting, or reversion to heath habitat.



## LCT 1B: Open Coastal Plateau

**Devon Character Areas containing this LCT: Pebble Bed Heaths and Farmland; Sidmouth and Lyme Bay Coastal Plateau**



*A typical view across LCT 1B, looking east from Gore Lane, near the Devon Cliffs Holiday Park. The Pebble Bed Heaths form the horizon.  
Sidmouth and Lyme Bay Coastal Plateau Devon Character Area*

### Description

This coastal LCT occurs in the southern part of the study area, and comprises the highest land along the coast between Lyme Regis and Exmouth. It is gently undulating, and also dissected by deep valleys (LCT 3A and 4D). It contains mainly regular shaped fields, often medium-large in size, and surrounded by deep hedges. Much of the land is in arable use, and the soil colour contributes to local character (generally red from sandstone in the west and paler from limestone in the east). There are also pockets of coastal grassland. The LCT feels elevated, exposed and coastal, even when the sea isn't visible. This is partly due to the windswept feel, the expanse of sky to the south, and the presence of salt-tolerant vegetation such as low thickets of blackthorn. Dramatic sunbursts and cloud formations are relatively frequent. There are some estate influences, particularly around Rousdon. Settlement is generally sparse and limited to scattered farms, although there are several campsites/ caravan parks. There are relatively few roads, but there are spectacular coastal views from the South West Coast Path where it follows the boundary between the plateau and the cliffs.



## Key Characteristics

**Note:** **Bold** text indicates a Devon-wide characteristic. Not bold indicates a local characteristic

- **High, undulating, open plateaux, dissected and separated by combes and river valleys.** Underlain by Permian and Triassic sandstone and mudstone in the west and limestone in the east.
- **Little woodland**, with occasional plantations and estate planting. Some **windblown vegetation**.
- A relatively large scale landscape, with a **regular medium to large field pattern, dense low hedges**, containing mix of species and **occasional hedgerow oaks. Mixed land use, mainly arable.**
- Semi-natural habitats include salt-tolerant coastal grassland, hedgerows, trees and verges, and wind-cropped thickets of blackthorn.
- Local influence of Rousdon Estate, and a post-medieval pattern of fields and farms. Numerous former limestone quarries, particularly around Beer.
- **Prehistoric archaeology** including barrows and hillforts, with a concentration of prehistoric toolmaking sites and evidence of Roman occupation on Beer Head.
- **Low settlement density**, mainly limited to scattered farms or hamlets. There are also several campsites and caravan parks.
- **Few roads, but many rights of way**, including long sections of the South West Coast Path. Main roads are straight and fast along ridges. Minor roads linking combes are narrow and often sunken.
- **Variations in underlying geology are reflected in soil colour**, being red in the west and paler in the east.
- **Extensive views along coast**, often visible from South West Coast Path. Much of the LCT has a sense of openness and exposure. Context of open sky to the south and land to the north adds to the sense of place

## What Makes this Landscape Special

High land which is often highly visible in views along the coast and from elevated viewpoints.

Excellent coastal views, particularly from South West Coast Path along the southern edge of the LCT.

Geological importance, forming the setting and views of the Jurassic Coast World Heritage Site.

Registered Historic Park and Garden at Rousdon, with estate influence on surrounding buildings, walls, etc.

Prehistoric archaeology, with a concentration of sites on Beer Head.



*Undulating arable fields on the Open Coastal Plateau east of Axmouth.*



*Coastal Grassland and forestry blocks, Peak Hill/ Mutters Moor*

## Forces for change acting on this LCT

### Past and current forces for change

- Coastal erosion, resulting in loss of coastal land, and the diversion of the South West Coast Path inland.
- Campsites and caravan parks are generally well-hidden, but some sites (particularly coastal sites) are visible in views along the coast.
- Expansion of settlements upwards from lower land onto surrounding Open Coastal Plateau. There is currently particular pressure for development expansion around Lyme Regis.
- Limestone quarrying, particularly around Beer.
- Wind turbine west of Seaton can be seen from a wide area.
- Changing agricultural management practices, including an increase in pig rearing (due to the clean air and lack of airborne infections) and use of crop covers.

### Future forces for change

- Continued development pressure and expansion of developed area onto higher ground.
- Potential impacts from Coastal Change Management, including accommodating development at risk from coastal erosion.
- Spreading room associated with the England Coast Path will potentially result in land use change along cliff tops.
- Unknown landscape impacts of future changes to agricultural grants and policies.
- Increased frequency and intensity of coastal storms as a result of climate change, potentially affecting vegetation and land use choices, and increasing coastal erosion rates.

### Landscape Aims

Retain the Open Coastal Plateaux as a large-scale and predominantly undeveloped landscape which forms a positive setting and skyline to the coast, World Heritage Site, South West/ England Coast Path and several settlements. Incursion of development onto higher land should be avoided. Habitat diversity should be encouraged, particularly the establishment and linkage of coastal grassland. Archaeological sites and ancient coastal landscapes should be protected.



*Wind turbine west of Seaton*



*East Devon Cliffs Caravan Park*



*Plastic crop covers, and pig shelters*

## Landscape Guidelines

### Protect

- Skylines and ridgetops which contribute to coastal views and form the settings to settlements.
- Archaeological sites, particularly Beer Head, and record if vulnerable.
- The setting of the Jurassic Coast World Heritage Site.
- Open and undeveloped land which forms the setting to settlements.

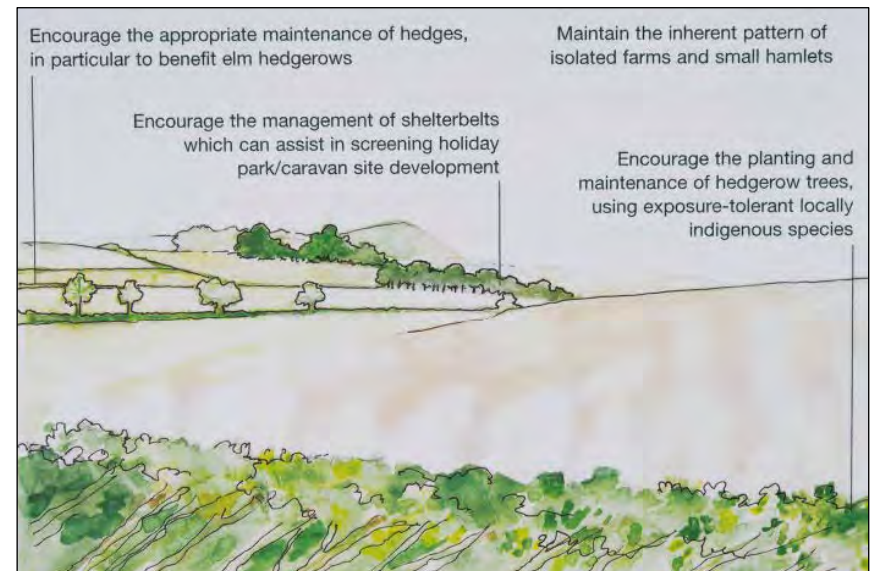
### Manage

- Coastal grassland, including promoting habitat links (for example along field edges) to connect grassland sites.
- Habitats to support farmland birds, such as circl buntings, which require a mixture of hedgerows, grassland and arable crops.
- Hedgerows, particularly surviving elm hedgerows, using traditional management techniques and replacing hedgerow trees where necessary using indigenous and salt tolerant species. Fill gaps in hedgerows where necessary.
- Shelterbelts, particularly where they are screening caravan parks and other development. Encourage planting of deciduous edges to soften the visual impact.
- Damp/ wet grassland habitats in shallow valleys, grazing or cutting where necessary to prevent establishment of scrub.
- Woodlands and plantations, aiming for age and species diversity, and promoting use of local seed. Aim to link woodland blocks through copses, tree belts and hedgerows.
- Historic estates, developing Parkland Management Plans if required.

### Plan

- Ensure that any development in adjoining LCTs/ urban areas is sympathetically screened using indigenous tree/ hedgerow species.

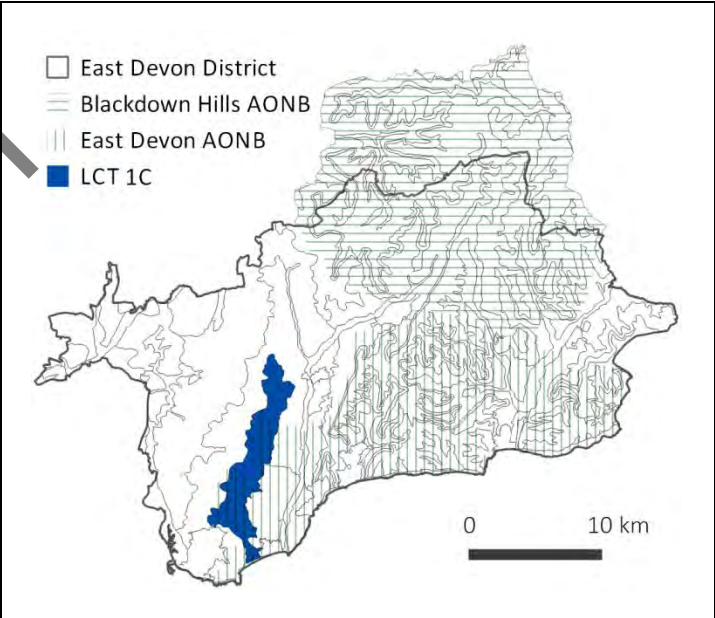
- Consider accommodating recreational pressure on arable land, rather than in more sensitive habitats (including the expansion land required for the South West Coast Path/ England Coast Path).
- Continue to keep inland campsites well screened. Resist expansion of coastal sites which can be seen in coastal views and encourage sites to enhance their landscape settings.
- Work with quarry companies to develop management and restoration plans which enhance landscape character, geodiversity & biodiversity.
- Develop a long-term plan for conifer plantations reaching maturity, identifying areas suitable for replanting, or reversion to heathland.
- Identify areas suitable for extensive new woodland planting within this large-scale landscape.
- Enhance the Rights of Way network, linking paths and access land to create circular walks from settlements or existing car parks.
- Refer to relevant Objectives, Policies and Aims in the South Marine Plan.





# LCT 1C: Pebble Bed Heaths

Devon Character Areas containing this LCT: Pebble Bed Heaths and Farmland; Sidmouth and Lyme Bay Coastal Plateau



*A typical view across LCT 1C, looking north over Bicton Common, with Woodbury Castle on the horizon.  
Pebble Bed Heaths and Farmland Devon Character Area*

## Description

This LCT is unique within Devon, and forms a north-south ridge running north from Budleigh Salterton. It is defined by its distinctive sand-and-gravels geology. Soils are poor, and the area was traditionally used as common land. Much of the area remains open, with extensive areas of heath and grassland, as well as pockets of forestry plantation and farmland (particularly in the north). Since the 1930s the majority of the area has been managed for recreation and wildlife conservation, and is internationally-designated for its nature conservation importance. It is also rich in archaeology. Prehistoric features include Woodbury Castle, barrows along the ridge line, hut platforms and traces of field systems. Surviving evidence for common land use includes the open heath, boundary banks, markers and stones. The Pebble Bed Heaths have a strong and unique sense of place due to their openness, vegetation and distinctive horizons. There are splendid views along the ridge, and over surrounding lower land.

## Key Characteristics

**Note:** **Bold** text indicates a Devon-wide characteristic. Not bold indicates a local characteristic

- A north-south ridge of high, gently undulating plateau. Distinctive Bunter Pebble Beds geology influences vegetation and land use, and also forms the source of pebbles for Budleigh Salterton beach.
- Conifer plantations and some beech woods, with areas of more scattered trees including oak and birch.
- Former common land, now used for extensive recreation and conservation. Pockets of farmland in the north and at peripheries, also quarrying and military use.
- Extensive actively-managed lowland heath and woodland habitats, supporting a range of birds, insects, plants and mammals. Also areas of wet mire around springs.
- Rich archaeology and cultural heritage, including extensive prehistoric remains and features of common land.
- Largely unsettled, although West Hill woodland village (mostly dating from the 1960s onwards) is located in the north of the LCT.
- Major north-south route along western edge, with some minor roads. Network of footpaths and bridleways, and extensive access and permitted access land.
- Panoramic views along the ridge, and also across surrounding lower land. The ridge itself forms a prominent feature in views.
- A strong sense of place, and of detachment from the surrounding area.
- Woodbury castle is a high focal point.



*Accessible meadow, heath and woodland at Bystock Pools Nature Reserve*



*View west from the Pebble Bed Heaths towards the Exe Estuary.*

## What Makes this Landscape Special

An extra-ordinary and distinctive landscape, unique in Devon, and accessible for recreation.

An extensive mosaic of heathland, woodland and wet mire habitats which are internationally designated for their nature conservation importance.

Rich extant archaeology (including prehistoric sites) which have survived because the land has not been enclosed or ploughed. A long history of use as common land, with associated features.

Long panoramic views from and along the ridge. The ridge also forms a backdrop to views across a wide area and contributes to the setting of the Jurassic Coast World Heritage Site.



## Forces for change acting on this LCT

### Past and current forces for change

- Recent quarrying and processing.
- Erosion of archaeological sites by people (e.g. Woodbury Castle) and vegetation. Woodbury Castle has ongoing restoration works to stabilise its banks.
- Parking places, whilst informal, need some management to prevent surfaces degrading.
- Recreational pressure resulting in damage to vegetation, litter and disturbance of habitats.
- Recreational land uses, including golf course and camp sites.
- Fire (accidental and arson) burning vegetation in an uncontrolled manner.
- Clear felling of trees in response to tree disease affecting the appearance of the landscape.
- Vegetation growing up in front of viewpoints, blocking views.

### Future forces for change

- Loss of trees due to tree disease and drought stress (exacerbated by climate change).
- Increased recreational pressure as the population of the surrounding area increases.
- Communications masts on high ground.

### Landscape Aims

Continue to manage this internationally-designated landscape primarily for conservation and recreation. Active and integrated management should enable the conservation of wildlife and archaeological sites, as well as enabling recreation and access where appropriate. The open and unsettled quality of the landscape should be retained. Particular respect should be paid to skylines and the role of the ridge as a backdrop for surrounding lowlands, and a setting for the World Heritage Site. Mineral restoration plans should enhance the landscape character, and promote conservation and access.



*Mineral pile at Black Hill quarry*



*Burnt vegetation on Colaton Raleigh Common*



*Restoration works on banks at Woodbury Castle*

## Landscape Guidelines

### Protect

- Archaeological sites and their settings, paying particular attention to surviving groups of features so they can be appreciated together.
- Skylines and elevated hillsides which form the backdrop of views from lower ground.
- The setting of the Jurassic Coast World Heritage Site.

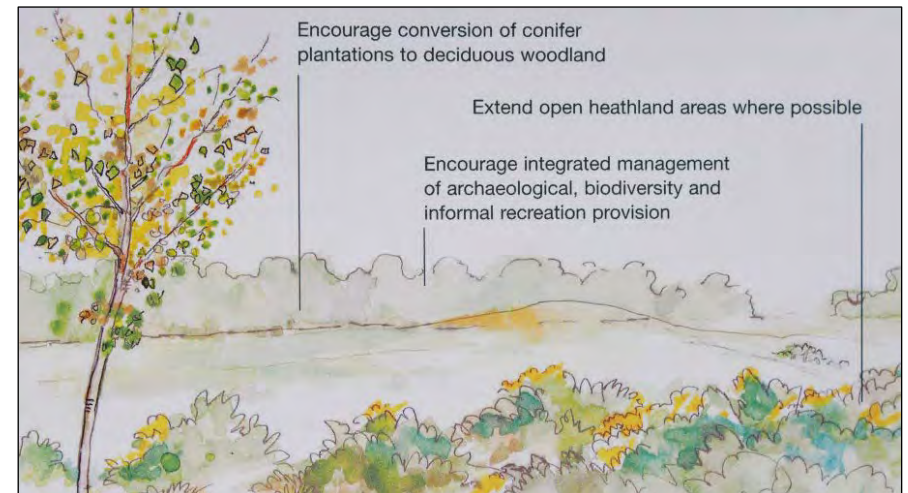
### Manage

- Vegetation, to promote a mosaic of woodland, heathland and grassland habitats. Where possible, use traditional management techniques such as grazing and bracken-cutting. Where enclosure is necessary for stock grazing, make sure it remains low-key and unobtrusive. Follow guidance in the appropriate Management Plans.
- Woodland, encouraging age and species diversity. Where commercial timber is being grown, include a heath stage in the crop rotation, and plant deciduous trees on the periphery.
- Viewpoints, providing interpretation and keeping vegetation clear so that views are not blocked.
- Visitors, including projects to offset recreational pressure by guiding visitors away from vulnerable areas, through – for example – a coastal forest park. Encourage recreational access and enjoyment of Public Rights of Way and access land without detriment to wildlife. Work with golf course to enhance positive management for biodiversity.

### Plan

- Restoration of mineral working sites to enhance landscape character, promote biodiversity and improve access. Restoration plans should take account of their surrounding context, and should enhance habitat connectivity across the LCT.
- Ameliorate impacts of future tree loss, including on recreation sites/routes.

- Locate any communications masts away from the edges of the ridge (where they would be particularly prominent) and make sure that they are seen against a treed backdrop.
- Promote sustainable access routes, and continue to provide adequate car parking provision so vulnerable habitats are not damaged by poor parking.
- Encourage education of recreational users, and explore potential to increase educational use explaining the geological links with the Jurassic Coast World Heritage Site, the rare habitats and species which the geology supports, and the surviving archaeology.
- Retain the predominantly undeveloped character of the LCT, particularly within the southern part.
- Retain the treed character of West Hill village and ensure it remains screened through tree planting.
- Retain the existing road pattern, and resist pressure to widen minor roads/ alter junctions unless essential for road safety.
- Refer to relevant Objectives, Policies and Aims in the South Marine Plan in decision-making, particularly when considering the southern part of the LCT.

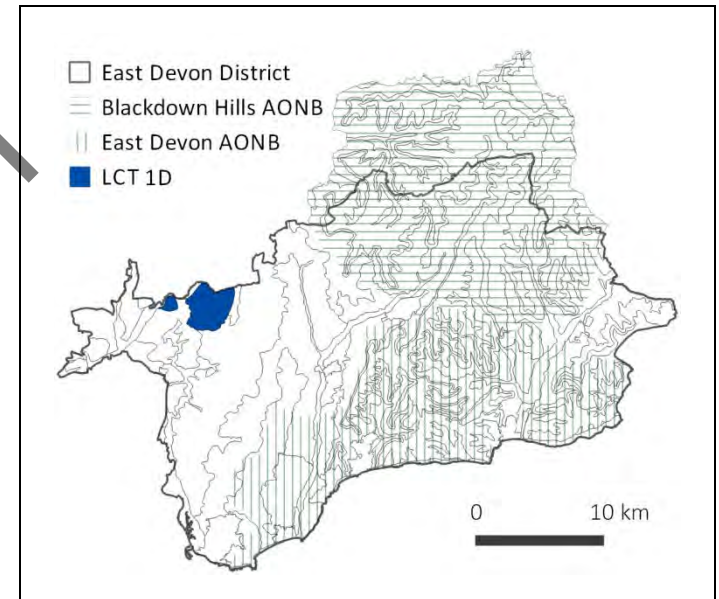


## LCT 1D: Estate Wooded Ridges and Hilltops

Devon Character Areas containing this LCT: Clyst Lowland Farmlands



*A typical view towards LCT 1D, looking north towards Ashclyst Forest from lane east of Broadclyst.  
Clyst Lowland Farmlands Devon Character Area.*



### Description

This LCT occurs in the north-western part of the Study Area, and is associated with the Killerton Estate. It comprises predominantly wooded hills in estate management, including Ashclyst Forest, and the ornamental planting in Killerton Park. The LCT forms distinctive wooded ridges on the horizon when viewed from nearby lower land. Much of the area is in National Trust ownership and has public access. Killerton House has full visitor facilities, and Ashclyst Forest contains several parking areas, picnic sites and trails. Killerton Park forms the setting to Killerton House. It is a Registered Historic Park and Garden, and contains surviving sections of deer park pales, as well as the earthworks of a prehistoric hillfort. There are ornamental and veteran trees within the Park, as well as woodland (mostly oak and ash) and some areas of conifer plantation within Ashclyst Forest.



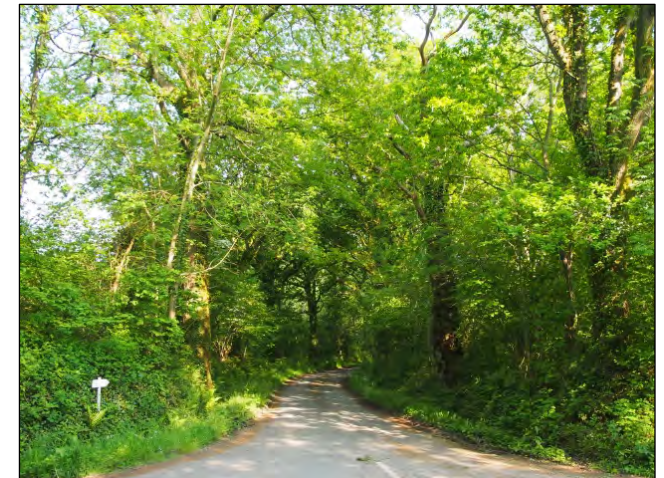
## Key Characteristics

**Note:** **Bold** text indicates a Devon-wide characteristic. Not bold indicates a local characteristic

- **Distinct ridges dissected by a series of streams contrasting with surrounding undulating land.** Quarries contain examples of fossilised volcanic lava.
- **Large banks of broadleaf ash, beech and oak woodland across ridges, with blocks of conifer plantation.** Estate woodland with veteran trees around historic designed landscapes. Woodpasture is currently being restored.
- **Land use predominantly woodland and pasture, with small-medium scale irregular fields bounded by mixed species hedges,** extensive woodland and parkland.
- **Rich variety of semi-natural habitats including deciduous and coniferous woodland and veteran trees,** supporting a notable variety of butterflies.
- **Ornamental historic parkland** with archaeological features including medieval deer park pales and a prehistoric hillfort.
- **Farmsteads** and occasional larger properties nestled at the base of slopes.
- **Strong traditional vernacular associated with estates,** including distinctive yellow-ochre Killerton estate buildings.
- Winding narrow lanes linking farmsteads. Very limited Public Rights of Way, but Ashclyst Forest is Access Land.
- **Strong sense of tranquillity and history with little modern development,** although concentrations of visitors can locally reduce the sense of tranquillity.
- **Summits affording spectacular panoramic views** where there are gaps in vegetation.



*Ornamental planting in Killerton Park, on the wooded hill behind Killerton House*



*A typical scene with narrow lanes, ash and oak trees in Ashclyst Forest*

## What Makes this Landscape Special

A strong cultural history, including nationally-designated archaeological sites, and designed landscapes, which are open to the public.

Its elevated woodlands and mosaic pattern of fields forms a distinctive landscape backdrop to the surrounding lowlands.

Valued and accessible woodland and parkland habitats, supporting a range of species including bluebells, birds, butterflies and other insects.

Unusual geology visible in historic quarries provides a glimpse into the volcanic history of the area.



## Forces for change acting on this LCT

### Past and current forces for change

- Over-maturity and potential loss of parkland trees.
- Commercial forestry plantations obscuring estate planting.
- Decline in traditional woodland management.
- Conifer plantations reaching maturity.
- Loss of woodpasture as secondary woodland has established.

### Future forces for change

- Loss of ash trees to ash dieback likely over the next 5-10 years. Other trees (specifically larch and oak) also threatened by tree disease.
- Tree loss as a result of climate change, for example storm damage following increased frequency and intensity of storm events; loss of beech trees following prolonged periods of summer drought.
- Potential future loss of trees impacting on recreation provision. Reduction in shade may affect some activities, with consequent impacts on health and wellbeing, particularly in the context of hotter climatic conditions.
- Increased recreational pressure such as littering, erosion of archaeological sites, and trampling of fragile habitats, particularly as the local population increases.

### Landscape Aims

The wooded character of the landscape should be retained, along with the mosaic pattern of small fields. Careful but discreet visitor management will enable enjoyable access whilst avoiding damage to archaeological sites or fragile habitats. Provision should be made for shaded recreation to continue even if existing trees are lost. Cars and people should not dominate the experience of being within this LCT. Nature conservation, particularly of veteran trees, butterflies and bluebells should be encouraged, and archaeological and geological sites should be kept in good repair. The wooded hills should continue to provide an attractive backdrop to the surrounding lowlands and the Killerton Estate.



*Felled conifer plantation, Ashclyst Forest*



*Barrier preventing unlawful vehicle access, Ashclyst Forest*



*Veteran tree, Killerton Park*

## Landscape Guidelines

### Protect

- Archaeological sites (and their settings) and geological conservation sites.
- Skylines, avoiding structures sited where they would break the horizon.

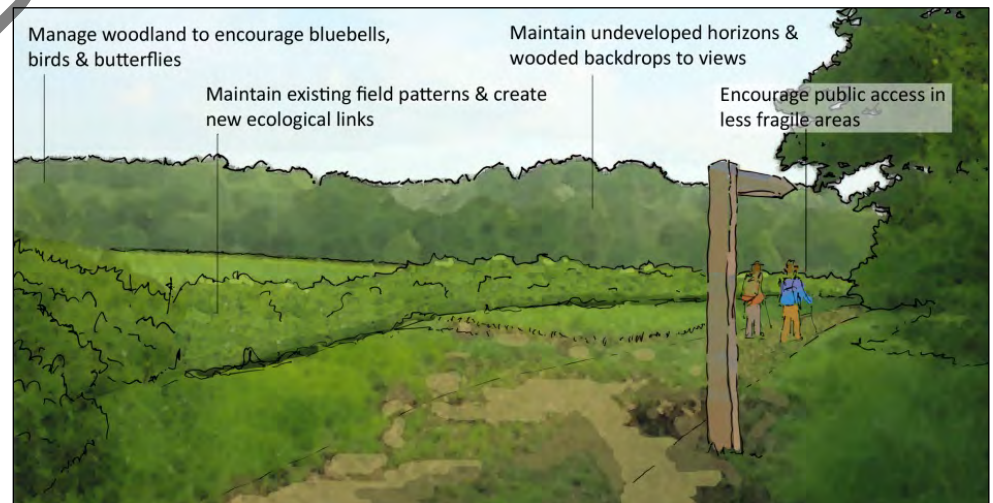
### Manage

- Hedgerows, to maintain field patterns and strengthen habitat network, and to provide links between wooded areas.
- Woodlands, aiming for a mosaic of woodland habitats and good age and species diversity. Measures which encourage butterfly habitat and bluebell populations should be supported. Use traditional techniques such as coppicing where possible.
- If necessary replace lost ash, using [best practice guidance](#) to identify locally-appropriate species.
- Veteran trees, including identification and recording.
- Ornamental planting forming part of historic garden designs, whilst preventing the establishment of invasive species such as rhododendron in woodland.
- Visitors, to minimise damage to habitats and historic features whilst enabling public access. This can be achieved through (for example) low-key signage, clear demarcation of paths, and opening up opportunities for recreation in less sensitive parts of the LCT, such as conifer plantations.
- The landscape in accordance with National Trust Management Plan.

### Plan

- Retain the landscape as an attractive elevated and undeveloped backdrop to views from surrounding lowlands and Killerton Estate.
- Maintain the largely unsettled character of this LCT.

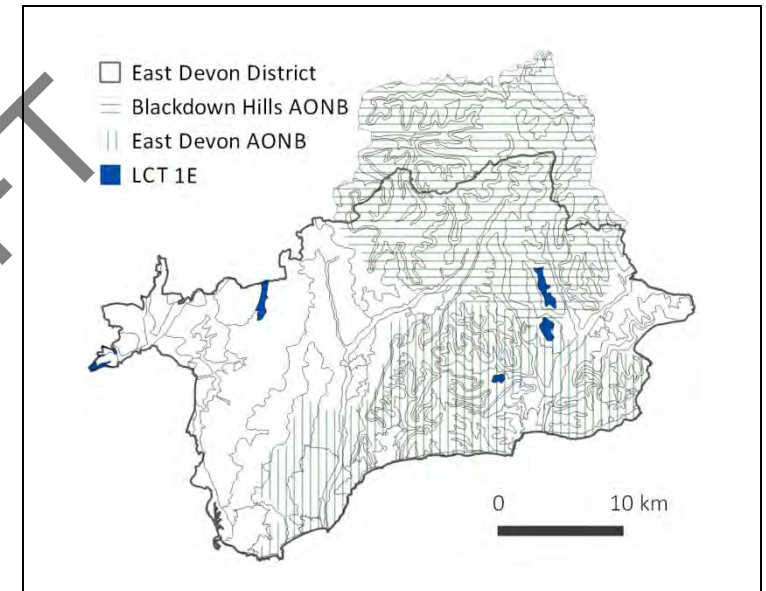
- Any new development should be small in scale and fit with existing built form and function.
- Consider connections with Clyst Valley Regional Park and wider Green Infrastructure associated with Cranbrook development. This could take the form of strengthened habitat links and movement networks (including existing lanes and tracks) to enable sustainable access into Ashclyst Forest.
- Ameliorate impacts of future tree loss, including on recreation sites/routes, to enable continued shaded recreation provision.
- Archaeological surveys (e.g. LiDAR) to identify archaeological features in woodland.
- Keep horizons clear of development. If masts are unavoidable, they should be sited against a wooded backdrop.





## LCT 1E: Wooded Ridges and Hilltops

Devon Character Areas containing this LCT: Axe Valley; Clyst Lowland Farmlands



A typical view across LCT 1E, from the southern end of Danes Hill (above Clifthorne Farm) looking south towards Shute Hill.

Axe Valley Devon Character Area

### Description

Examples of this LCT are scattered in a band which runs east-west across the centre of the study area. They comprise wooded/ treed hills and ridges which rise above the surrounding landform and create distinctive profiles on the horizon. There are areas of deciduous woodland (some ancient) as well as forested areas such as Shute Hill. Their wooded appearance is enhanced by roadside and hedgerow trees (particularly oaks) and the species-rich hedgerows which line the small-medium size fields. The scattered farms, including historic farmsteads, are connected by narrow, sunken lanes, which climb the sides of the ridges, and afford spectacular views from the ridge tops. This is an historic landscape with a strong sense of place. Archaeological features include beacon sites in prominent locations, including a stone Armada beacon house on Shute Hill which has views to the coast.

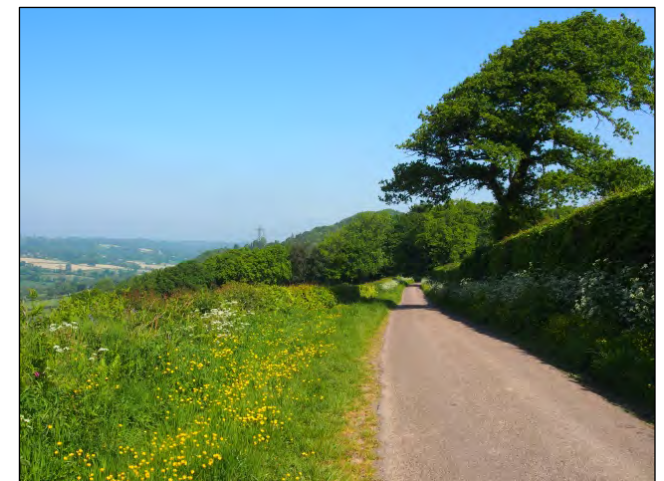
## Key Characteristics

**Note:** **Bold** text indicates a Devon-wide characteristic. Not bold indicates a local characteristic

- **Small hills and associated small ridges**, often isolated **outliers of the plateaux**.
- **Species-rich hedgebanks and tree rows, ancient woodland and great species diversity with oak and ash common as hedgerow trees**, and flowering cherry in woodland. Also areas of conifer plantation.
- **Small to medium irregular fields and spring-line mires. Mixed woodland and some pasture, with occasional arable use.**
- Semi-natural habitats include woodland, hedgebanks, verges, springline mires and streamside vegetation.
- An historic landscape with surviving medieval lanes, farmsteads and enclosure patterns. Prominent hills were used as beacon sites.
- **Sparsely settled**, with scattered farms nestled at the base of hills, or occasionally on ridge-tops.
- **Narrow, enclosed winding lanes** lined with species-rich banks climb ridges, often becoming less enclosed on ridge tops. There are occasional green lanes and public rights of way.
- **Feels high and frequently remote**, with little traffic, and a sense of detachment from surrounding lower land.
- **Limited views out** from lanes, but occasional spectacular views out from ridge tops.
- Form the backdrop and skyline in views from valleys below.



*Steep lane lined with banks and oak trees, west of Clyst Hydon*



*Ridge-top road with wildflower-rich verges, and long views over the adjacent valley, Horner Hill*

## What Makes this Landscape Special

Prominent wooded/ treed hills, which form landscape backdrops and distinctive features on the skyline. Their prominence meant that they were used as beacon sites – evidenced in place names, and in the surviving stone Armada beacon house on Shute Hill, overlooking the coast.

The surviving medieval landscape pattern of lanes, fields, farms and tracks gives it a strong sense of place and history.

Spectacular views over surrounding valleys and lowlands, and a sense of tranquillity and detachment.



## Forces for change acting on this LCT

### Past and current forces for change

- Invasive rhododendron in woodland (Shute Hill).
- Conifer plantations, including extensive blocks, reaching maturity and requiring clear felling.
- Loss of views from viewpoints (e.g. Shute Hill) due to vegetation growth (although efforts are being made to keep it in check).
- Decline in traditional woodland management.
- Large buildings, solar farms etc. seen in views over lower land below.
- Growth of scrub on unimproved grassland areas.
- Changes in farm structure, including amalgamation of holdings and a demand for larger farm buildings. Also a decline in livestock (dairy) farming, meaning that traditional stockproof hedgerows and banks are no longer required and may fall into disrepair.

### Future forces for change

- Loss of trees to ash dieback and other tree diseases, climate change and over-maturity, potentially reducing the wooded appearance of the ridges.
- Climate change, potentially impacting on tree species, agricultural practices, water supplies and opportunities for shaded recreation at Shute Hill.
- Continued demand for larger farm buildings visible from a wide area.
- Increased light pollution from farm yards and buildings.
- Continued demand for large-scale development on surrounding lower land, affecting views out.

### Landscape Aims

The historic and very lightly settled character of the LCT should be retained, and the distinctive ridgelines kept free from development. The rich species diversity of woodlands, hedgerows, grasslands and mires should be protected and enhanced through appropriate management. Viewpoints should be accessible, and views kept open.



*Felled and replanted trees, Great Pen (west of Colyton)*



*Large farm buildings located below ridgeline*



*Cleared but regrowing vegetation in front of Beacon House viewpoint, Shute Hill.*



## Landscape Guidelines

### Protect

- The historic landscape pattern of wooded slopes and irregular pastoral fields.
- Archaeological sites and their settings.
- The very lightly settled character of the landscape.
- Distinctive ridgelines and skylines, keeping them free from development and other intrusive structures.
- The character of historic narrow lanes and tracks, avoiding road widening and unnecessary signage.

### Manage

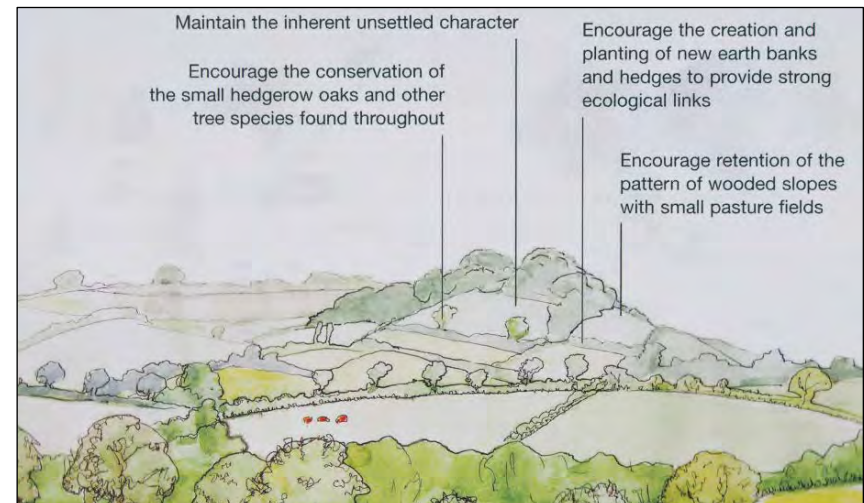
- Viewpoints (e.g. Shute Hill Beacon House), keeping vegetation clear.
- Hedgerows and hedgerow trees to retain their presence in the landscape and the pattern of wide, medium-height hedges.
- Woodland, including removal of invasive species and promotion of bluebells in ground flora. Use traditional techniques such as coppicing where possible.
- Promote age and species diversity in woodlands, and around the peripheries of plantations, using local seed where possible.
- If necessary replace lost ash trees, using [best practice guidance](#) to identify locally-appropriate species.
- Unimproved pasture, grazing or removing vegetation to prevent establishment by scrub.
- Spring line mires, to retain associated habitats.

### Plan

- Create new ecological links between woodland blocks.
- Retain the existing pattern of very limited settlement. Any new

development should relate to existing buildings and land uses, and should be of a similar or smaller scale to existing structures.

- Be aware that any development within this LCT is likely to be prominent in views. Keep ridgelines clear of development, ensuring farm buildings are located below the ridgeline when seen from below. Use visually-recessive materials and minimise light pollution.
- If communications masts are unavoidable, ensure that they are set below the ridgeline, and / or have a treed backdrop.
- Develop a considered approach to the management of conifer plantations on reaching maturity. This may include encouraging natural regeneration on former deciduous woodland sites.
- Identify suitable sites for archaeological survey (LiDAR) to increase understanding of archaeological features within woodland.
- Ameliorate impacts of future tree loss, including on recreation sites/routes.
- Encourage the public to explore the LCT and appreciate the views through legitimate use of footpaths, quiet roads and green lanes.
- Consider the impact of proposed developments in surrounding lower LCTs on views from this LCT.

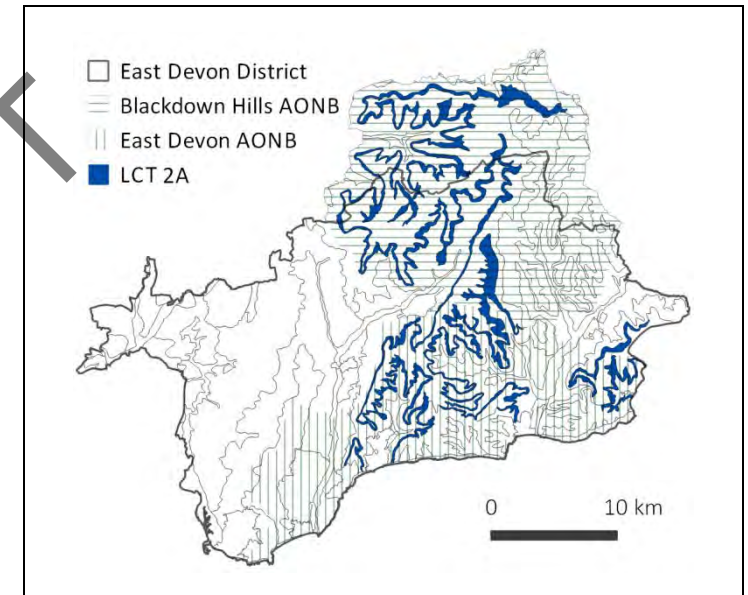


## LCT 2A: Steep Wooded Scarp Slopes

Devon Character Areas containing this LCT: Blackdown Hills; Blackdown Hills Scarp; East Devon Central Ridge; Sidmouth and Lyme Bay Coastal Plateau



*A typical view across LCT 2A, looking east along the Blackdowns Scarp from north of Gidland Farm.  
Blackdown Hills Scarp Devon Character Area*



### Description

This LCT occurs in the eastern half of the Study Area. It comprises the steepest land below the plateaux, and forms a series of narrow 'ribbons' which wrap around the tops of the valleys and form their backdrops. This land is often too steep to farm so has been left as woodland. There are also pockets of irregular medieval fields which have been carved out of the woodland (assarts). It has a high nature conservation value, containing woodland, grassland and springline mires. Many prehistoric hillforts are located within this LCT, often on the ends of promontories which extend above surrounding valleys. There are outstanding views from scarp slopes over surrounding lower land, particularly from the hillfort sites. Steep, narrow and often sunken lanes wind up and down the scarp, occasionally passing an isolated farm.



## Key Characteristics

**Note:** **Bold** text indicates a Devon-wide characteristic. Not bold indicates a local characteristic

- **A narrow band of steeply sloping land immediately below the plateau edges.** Underlying greensand geology contains springlines.
- Extensive woodland, both deciduous and coniferous. Trees and hedgerows increase its wooded appearance. Notable mature oak and ash trees, with beech in the north.
- **Land use of mixed woodland and semi-improved or unimproved pasture. Small scale, irregular field pattern.**
- **Many patches of semi-natural habitats, including springline mires, scrub, grassland and woodland.**
- Concentration of Iron Age hillforts in prominent locations. Also Roman and medieval ironworking sites, and medieval farmsteads, banks, fields and lanes. .
- **Lightly settled**, with occasional scattered farms, often nestled in folds of the scarp.
- **Narrow winding lanes with well-treed banks.** Lanes often run at an angle to the slope. Some green lanes and footpaths, but much of the LCT is inaccessible.
- Strong sense of enclosure in wooded areas, and a contrast of light and darkness. Irregular fields create varied and distinctive patterns.
- Seasonal contrasts in colour, particularly in deciduous woodlands, including spring bluebell woods and autumn leaves.
- From less wooded areas, and openings in trees, there are sudden and spectacular views over surrounding landscapes.
- Strong sense of tranquillity over much of the LCT, particularly away from roads and settlements.

## What Makes this Landscape Special

A rich diversity of woodland, grassland and springline habitats, within an historic landscape pattern.

Its dramatic appearance as a steep ridge at the tops of the valley sites, creating a seasonally-changing backdrop to the valleys below.

Outstanding prehistoric archaeology, with numerous Iron Age sites on prominent spurs of land.

A strong sense of tranquillity, and magnificent views over surrounding valleys and across to scarps.



*Veteran ash trees line the earthworks of Musbury Castle Iron Age hillfort*



*View over scarp slopes in the Wootton Hills, east of Axminster*



## Forces for change acting on this LCT

### Past and current forces for change

- Commercial conifer plantations reaching maturity, possibly resulting in clear felling.
- Flash flooding and water run-off causing damage to roads and paths following heavy rain.
- Damage to archaeological sites by bracken, trees and other vegetation, and erosion by visitors.
- Establishment of scrub and bracken on grassland and mires sites.
- Small traditional farms no longer economically viable, so farm amalgamation results in fewer, larger farms. These often require larger, non-traditional buildings.
- Wider farm vehicles damage verges and banks along narrow lanes.
- Decline in smaller livestock farms (particularly dairy) means that stockproof hedgerows are no longer required so may no longer be maintained.
- Decline in traditional woodland management.
- Abandonment of farm buildings no longer required for their original purpose.
- Loss of views from viewpoints due to encroaching vegetation.
- Pylons and power lines prominent where they cut through woodland scarps.

### Future forces for change

- Tree loss from ash dieback is likely to be a significant force for change, as there are many ash trees within this LCT, including veteran trees, woodland trees and hedgerow trees. This may also impact on shade for recreational activities and routes.
- Loss of beech trees due to drought resulting from climate change.
- Other potential impacts of climate change including tree loss in storms, changes to water supplies and different farming patterns.
- Currently unknown landscape impacts of future changes in agricultural funding and policies.
- Pressure for structures in prominent locations (e.g. communications masts).

### Landscape Aims

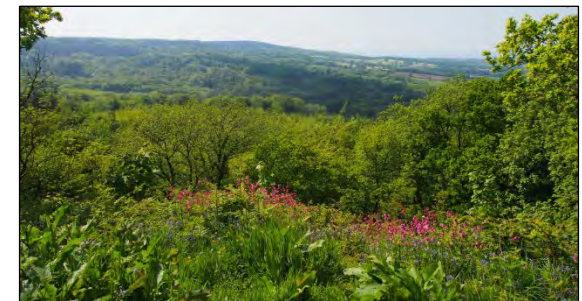
Retain the wooded appearance of the landscape, and the distinctive and attractive pattern of irregular fields which provide a dramatic but soft backdrop for the valleys below. The wide range of habitats, including woodlands, grasslands and mires should be managed in an integrated way. The rich archaeology should be well protected and researched, with non-damaging access encouraged. Views should be celebrated and accessible.



*Wooded scarp near Wilmington, with conifer plantations, and masts and pylons above*



*Damaged road surface, Otter Valley*



*Open viewpoint maintained, Castle Neroche*

## Landscape Guidelines

### Protect

- Archaeological sites, keeping earthworks clear of scrub and bracken, and protecting against erosion.
- The distinctive patchwork field patterns, e.g. on slopes of Dumpdon Hill.

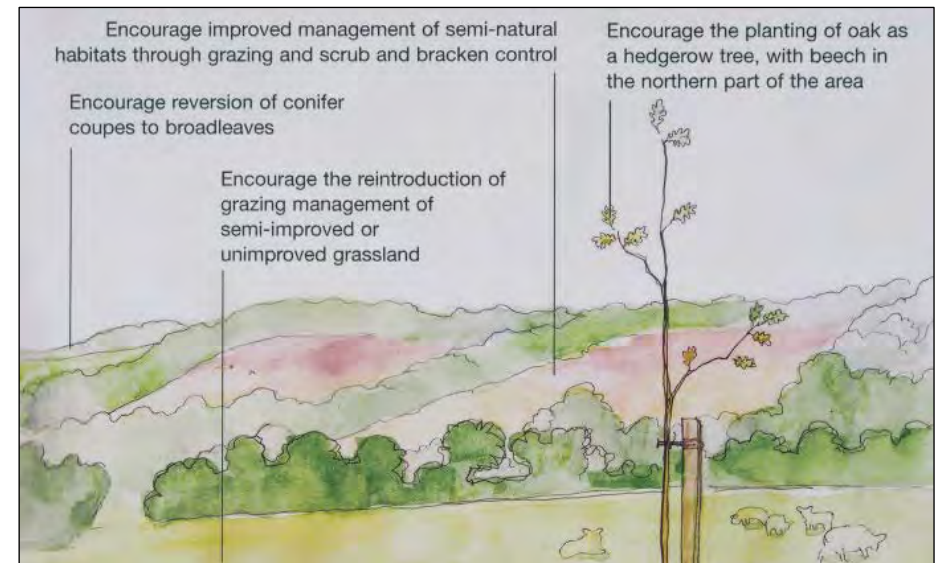
### Manage

- Viewpoints, keeping vegetation controlled to allow views out.
- Woodlands, using traditional methods such as coppicing where possible, to improve age and species diversity. Where replanting, use local seed if possible. If necessary replace lost ash trees, using [best practice guidance](#) to identify locally-appropriate species.
- Grassland and mire sites, using appropriate grazing or cutting regimes to prevent encroachment by scrub.
- Hedgerows, using traditional techniques where possible, and retaining/replacing hedgerow trees. In general, beech are the dominant hedgerow trees in the north of the LCT, and oak in the south. Support local hedgelaying groups.

### Plan

- Retain the overall undeveloped character of the LCT.
- Retain undeveloped horizons at the top of the scarp. These often form the skyline in views from below, and any development here would be very prominent.
- Support traditional farms and farming techniques, for example by identifying and supporting new product markets and providing grants for projects which enhance landscape character.
- Develop Natural Flood Management techniques to control water run-off.
- Record and photograph ash trees (particularly veteran trees) before ash dieback disease takes a greater hold.

- Promote habitat links between discrete areas of woodland and between grassland sites.
- Develop a long-term plan for conifer plantations reaching maturity, identifying areas suitable for replanting as deciduous woodland (including former ancient woodland sites), or reversion to grassland or heathland habitat.
- Ameliorate impacts of future tree loss, including on recreation sites/routes.
- Undertake LiDAR surveys of archaeological sites within woodland/ scrub to better understand the rich archaeology of this LCT.
- Develop and promote a trail between the many prehistoric hillforts within this LCT, providing safe and non-damaging access, interpretation and viewpoints.
- Consider the visual impacts of any new development on lower ground in views out from this LCT.



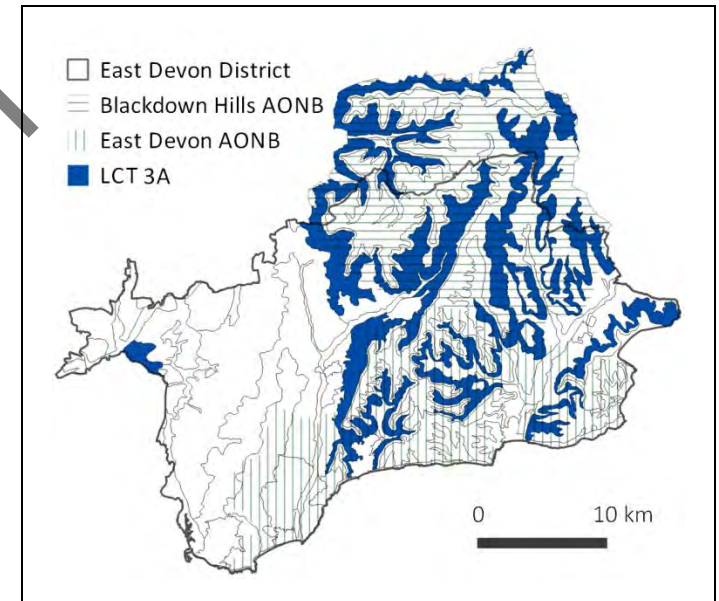


## LCT 3A: Upper Farmed and Wooded Valley Slopes

**Devon Character Areas containing this LCT:** Axe Valley; Blackdown Hills; Blackdown Hills Scarp; Clyst Lowland Farmlands; East Devon Central Ridge; Eastern Blackdown Ridge; Exeter Slopes and Hills; Sidmouth and Lyme Bay Coastal Plateau



*A typical view within LCT 3A, looking north towards Wambrook Church.  
Axe Valley Devon Character Area*



### Description

This LCT occurs in the eastern half of the Study Area, and also immediately north of Exeter. It sits between the wooded scarps and the gentler, more settled, lower valleys. This is an ancient and settled landscape, containing patchworks of irregular fields, woodland, winding lanes, scattered farms and small villages, often with square-towered churches. There are several small parklands and estate villages, and a high density of archaeological and historical sites. This creates a timeless quality and strong sense of history. Its pleasing compositions and distinctive landscape patterns created by hedgerows, trees and irregular fields inspired early C. 20<sup>th</sup> abstract artists. The Upper Farmed and Wooded Valley Slopes is relatively small in scale with an intimate feel. There are many attractive views within this LCT, and it also forms the foreground of views from higher land above.



## Key Characteristics

**Note:** **Bold** text indicates a Devon-wide characteristic. Not bold indicates a local characteristic

- **Undulating upper valley slopes** on Greensand, below the scarp slopes or plateaux. Small V-shaped valleys on upper slopes.
- **Deciduous woodland and copses, especially on upper slopes.** Hedgerow trees (mostly oak and ash) and some parkland trees add to the green and lush appearance.
- **Well-treed pastoral farmland, with some arable cultivation on lower slopes. Small to medium-size fields with irregular boundaries.** Associated with traditional Devon smallholdings.
- Rich concentration of archaeological sites from all periods, but with many surviving medieval features including field patterns, churches, farms, villages and lanes.
- **Wide, species-rich hedges with many hedgerow trees.** Grassland, stream and woodland habitats add to rich biodiversity.
- **A dispersed settlement pattern of isolated farms and small villages.** Villages are often nucleated around a church, and contain local stone (chert) and cob buildings. Some are estate villages.
- **Very winding narrow lanes,** many sunken with high banks and flower-rich verges.
- **An intimate and intricate landscape with wider views often confined by vegetation.** Where views occur, they contain distinctive patchwork patterns of fields.
- Relatively **remote and tranquil with little obvious modern development.**
- Association with the early C.20<sup>th</sup> Camden Town school of artists in Blackdown Hills.

## What Makes this Landscape Special

Exceptionally high scenic quality, with landscape patterns visible from surrounding higher ground, and viewpoints within the LCT. This quintessential Devon landscape continues to inspire visitors and artists, and there is a sense of dropping-down into wide vistas. Dark skies are characteristic at night.

Exceptional survival of archaeological and historical features, particularly from the medieval period. In many areas, the pattern of lanes, tracks, farms, villages and churches feels as though it hasn't changed in centuries. There is a rich built heritage of churches, houses, farms and farm buildings.

Several estates, with associated houses, parks and estate villages.



*Patchwork of medieval field patterns near Monkton, as seen from Dumpdon Hill*



*Estate cottages at Gittisham, associated with the Coombe Estate.*

## Forces for change acting on this LCT

### Past and current forces for change

- Development pressure, particularly around Honiton.
- Linear growth of settlements along valleys.
- Need for additional housing, including affordable housing for local people.
- Increased size of farm buildings, and changing patterns of farming resulting in a smaller number of larger holdings. Traditional farm buildings becoming redundant or changing in character.
- Reduction in number of smaller livestock farms (particularly dairy) means that stockproof hedgerows are no longer required and may therefore become unmanaged.
- Decline in traditional woodland management.
- Plastic crop covers used due to changing crop choices and growing patterns.
- Damage to banks alongside narrow lanes by wide/ fast vehicles (including farm machinery), and unnecessary signage on village approaches affecting the character of rural lanes.

### Future forces for change

- Loss of ash trees as a result of ash dieback over next 5 – 10 years (already beginning to occur).
- Unknown impacts of future changes to agricultural grants and policies.
- Climate change potentially affecting agricultural practices, tree species and water supplies.
- Light pollution, particularly bright lights in farm yards/ buildings.
- Upgrading of roads (particularly the A30) increasing their visibility in the landscape.
- Continued development pressure.

### Landscape Aims

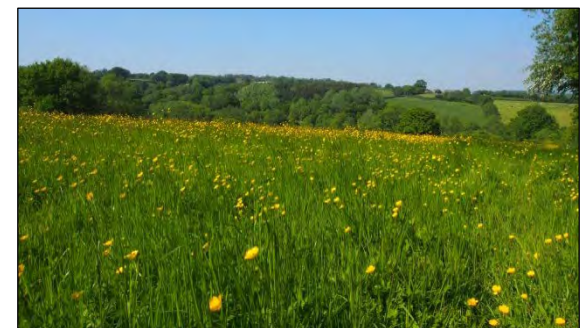
The historic fabric and existing landscape structure of small fields and woodlands should be retained and enhanced, so that the landscape retains its special 'patchwork' character and spectacular views. Wherever possible, agricultural practices should fit into the existing landscape structure and the impacts of any new buildings should be minimised. The LCT should be used for inspiring and educating the public, and telling the landscape story. Identify and protect areas of tranquillity and dark skies.



*Dead/ leafless branches on a hedgerow ash tree*



*New village-edge housing*



*Grassland site in positive management by the Wildlife Trust, Bishopswood Meadows Nature Reserve.*

## Landscape Guidelines

### Protect

- The historic fabric of the landscape, and its settings, including (for example) churches, houses, farms, estates and archaeological sites.
- Historic farm buildings, exploring alternative uses for redundant buildings which retain their external appearance.
- The distinctive patchwork field patterns, associated with traditional Devon smallholdings and often dating back to the medieval period.
- The character of rural lanes, resisting pressure for unnecessary signage, particularly at the entrance to villages.

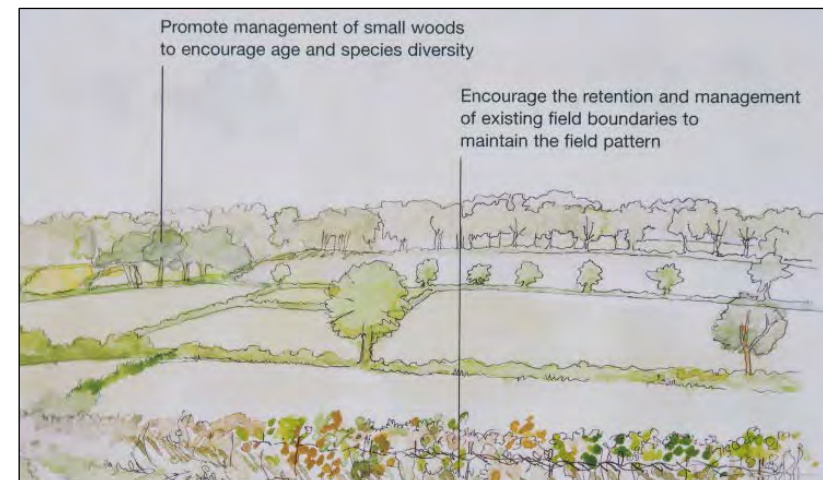
### Manage

- Hedgerows and hedgerow trees. Promote traditional hedgerow management techniques, and repair gaps in degraded hedgerows.
- Woodlands, aiming to promote age and species diversity, using traditional techniques (e.g coppicing) where possible. Link woodland blocks with copses and tree belts to improve habitat resilience. Encourage the planting of deciduous edges to conifer plantations. If necessary replace lost ash trees, using [best practice guidance](#) to identify locally-appropriate species.
- Grassland sites, promoting appropriate grazing to control scrub and maintain unimproved grassland, flushes and wildflower meadows.
- Historic parklands, including the planting of replacement parkland trees to ensure their continued presence within the landscape.

### Plan

- Support traditional farms and farming techniques, for example by identifying and supporting new product markets and providing grants for projects which enhance landscape character.
- Develop Natural Flood Management techniques to control water run-off.

- Develop guidelines for the design of new/ re-purposed farm buildings, including consideration of lighting.
- Carefully consider the impacts of proposed development on upper slopes, as these sites are often particularly visible in wider views.
- Retain the pattern of small-scale settlements constructed of local materials.
- Improve integration of new development into the wider landscape, specifically through characteristic landscape features such as hedges, earth banks and small woodlands.
- Where new dwellings are required, they should be carefully sited with regard to the traditional settlement form. For example, avoid linear development up the valley side above a nucleated village.
- Where appropriate, look to enhance the Public Rights of Way network in order to connect existing routes and create circular trails.
- Work with highways authorities to develop effective signage which minimises visual clutter and does not detract from historic settlements or village approaches.





### LCT 3B: Lower Rolling Farmed and Settled Valley Slopes

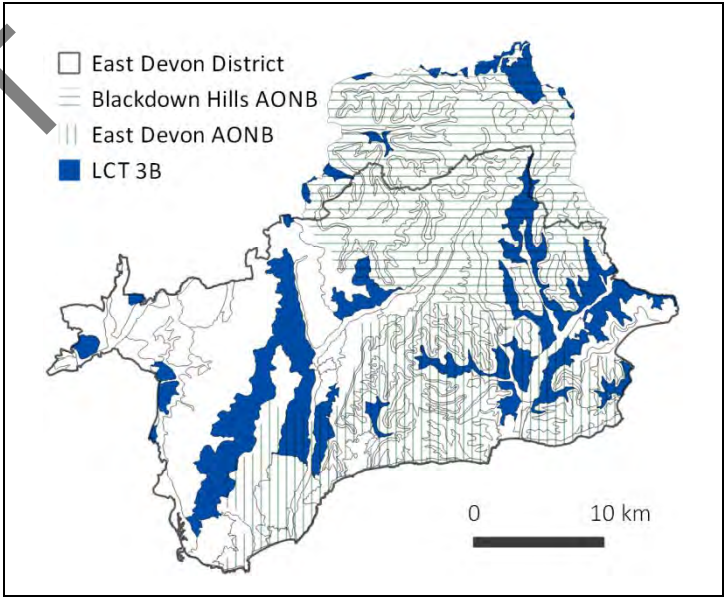
Devon Character Areas containing this LCT: Axe Valley; Blackdown Hills; Blackdown Hills Scarp; Clyst Lowland Farmlands; Exeter Slopes and Hills; Pebble Bed Heaths and Farmland; Wootton Hills

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A typical view across LCT 3B, looking north towards Woodbury.

Pebble Bed Heaths and Farmlands Devon Character Area



#### Description

This is one of the most extensive LCTs and can be found throughout the Study Area. It occurs on the lower slopes of the valley sides, and is generally a medium scale landscape, often with long views. It is predominantly agricultural, with pastoral and arable land uses (associated with distinctive red soils in the west of the Study Area). Patches of woodland, copses, and hedgerow trees give the landscape a well-treed character. It is a well-settled landscape, with farms, hamlets and villages (some of which have expanded). Villages are often centred on river crossing points and contain numerous historic buildings, often constructed of stone, and with church towers as focal points. Some villages have expanded to become larger settlements.

## Key Characteristics

**Note:** **Bold** text indicates a Devon-wide characteristic. Not bold indicates a local characteristic

- **Gently rolling landform, sloping up from valley floor.** Numerous shallow valleys contain small streams. Red sandstone geology apparent in cuttings and soils in west of study area.
- **Many hedgerow trees, copses and streamside tree rows.** Oak and ash predominate, and there are small blocks of woodland.
- **Predominantly pastoral farmland, often with a wooded appearance.** Variable sized fields with wide, low hedged boundaries and a mostly irregular pattern, reflecting different phases of enclosure.
- **Semi-natural habitats include streams and ditches,** grassland, woodland and trees.
- Numerous historic landscape features including farmsteads, lanes, villages and churches. Concentrations of Roman sites.
- **Settled, with various settlement sizes, building ages, patterns and styles.** Various building materials, including stone, cob, whitewash/ render, slate, thatch and tile.
- **Winding, often narrow sunken lanes, with tall earth banks.** Local examples of deep cuttings through sandstone, particularly at entrances to settlements.
- **A relatively enclosed and sheltered landscape.** Some parts of the LCT feel well settled, whilst others feel exceptionally remote, with very little traffic.
- Views tend to occur across valleys, rather than from within them. Higher land in other LCTs forms the backdrop to views.
- Often strong colours within the landscape, influenced by underlying geology, season and choice of crops.

## What Makes this Landscape Special

An extensive LCT which forms the setting for many settlements, and also contributes to many expansive views from higher ground.

A productive, working but still attractive landscape containing numerous historic and archaeological features.

A diversity of settlements, with building materials and settlement pattern reflecting local geology.



*Scene near Staple Fitzpaine, with the Blackdown Hills Scarp in the distance*



*Cadhay Barton, near Ottery St Mary.*



## Forces for change acting on this LCT

### Past and current forces for change

- Pressures for incremental growth around the edges of villages can affect the setting of villages and how they are seen in the landscape. Settlement expansion is particularly noticeable where its form is at odds with the traditional settlement pattern. For example, a linear expansion to a nucleated village, or expansion higher up a valley side.
- Abandonment and dilapidation of farm buildings no longer required for their original use.
- Demand for larger farm buildings which are often prominent in the landscape.
- Light pollution, particularly bright lights in farm yards/ buildings.
- Changes in crop choice reflecting market changes. For example, maize is increasingly being planted as a biofuel for anaerobic digesters creating biogas.
- Damage to banks alongside narrow lanes by wide/ fast vehicles, including farm machinery.

### Future forces for change

- Landscape changes resulting from Natural Flood Management techniques (e.g. introducing beavers).
- Further decline of apple farming due to changing consumer/ supermarket preferences, subsidy changes, and also climate change, as a minimum temperature is needed for apples to germinate.
- Future changes in agricultural policies and funding are currently unknown, but are likely to have major landscape impacts in this strongly-agricultural LCT.
- Tree loss, particularly ash in areas of more calcareous soils.
- Climate change potentially impacting on agricultural practices, tree species and water supplies.
- Continued development pressure.

### Landscape Aims

The landscape remains productive whilst retaining its landscape structure of hedgerows, woodland and farms. Alternative uses should be found for redundant farm buildings, and land uses should take place within the existing field patterns. Settlements thrive, and where they expand, this is done in a way which enhances their character and setting.



*Linear development on village edge*



*Finding viable uses for redundant farm buildings can be a challenge*



*Vulnerable ash trees and veteran oaks, Wootton Hills*



## Landscape Guidelines

### Protect

- Historic buildings and their settings. Where farm buildings are no longer required for their original purpose, consider alternative uses which retain their external appearance.
- Rural lanes, resisting pressure for widening or non-essential signage.

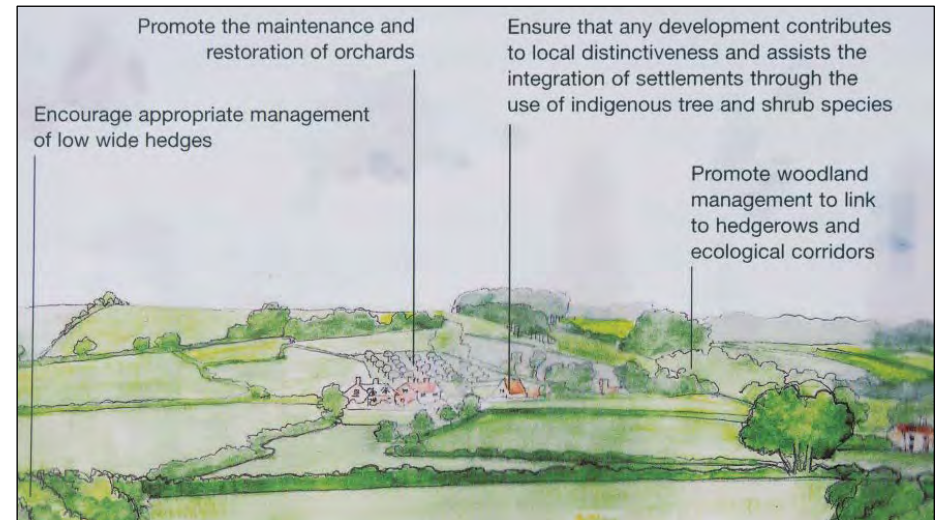
### Manage

- Field patterns, by repairing degraded hedgerows, promoting traditional hedgerow management, and also retaining/ planting hedgerow trees. Replace lost ash trees with alternative species.
- Traditional orchards, supporting restoration where possible.
- Recreation, specifically game shoots, equine activities and fishing lakes, to ensure that facilities contribute to landscape character rather than detract from it. For example, through designing tree screening to match existing woodland/ hedgerow patterns, and using native species which are present locally.
- Woodlands, aiming for age and species diversity, and taking opportunities to connect woodland blocks. If necessary, replace lost ash trees using [best practice guidance](#) to identify suitable species.

### Plan

- The location and form of any settlement expansion to be sensitive to existing road patterns and settlement form. For example, avoid ribbon development on the edges of nucleated villages.
- Retain distinctive entrances to villages (e.g. cuttings through sandstone banks) and consider how village approaches and entrances could be enhanced.
- Choose building materials which fit with the existing palette, taking particular care if considering bright or reflective surfaces.

- Consider settlements within their wider landscape settings. Ensure that appropriate measures to soften the settlement edge, and to integrate development into the landscape, are incorporated into any settlement expansion plans. Screening should enhance landscape character, for example through using fruit trees in traditional orchard areas, and avoiding stark lines of planting which do not respect the existing landscape pattern.
- Create stronger habitat links, particularly between woodland areas through additional woodland and hedgerow planting.
- Develop Natural Flood Management techniques to control water run-off.
- Where appropriate, look to enhance the Public Rights of Way network in order to connect existing routes and create circular trails.
- Consider the role of this LCT in wider views. It is often seen from above, so any developments spread over a large area (such as solar farms) are likely to be very apparent.



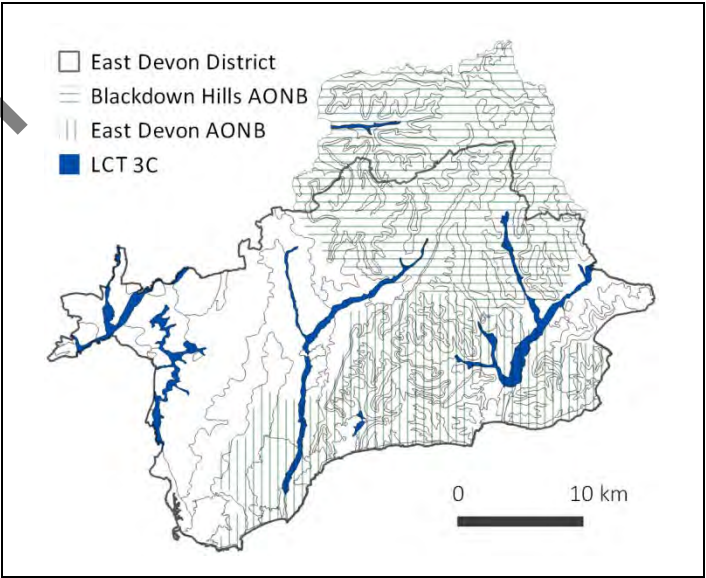
## LCT 3C: Sparsely Settled Farmed Valley Floors

Devon Character Areas containing this LCT: Axe Valley; Blackdown Hills; Clyst Lowland Farmlands; Exeter Slopes and Hills; Pebble Bed Heaths and Farmland; Yeo, Culm and Exe Lowlands

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*A typical view across LCT 3C, in the floor of the Exe Valley near Brampford Speke.  
Yeo, Culm and Exe Lowlands Devon Character Area*



### Description

This LCT is associated with the main river valleys: the Exe, Clyst, Culm, Otter, Yarty, Sid and Axe. It comprises the open, flat valley floors which often act as floodplains and which demonstrate active river processes such as meander formation. The landscape is largely unsettled (due to flood risk) but contains notable historic bridges, leats and mills. The lack of settlement gives the valleys a tranquil feel, which can be locally impacted where main roads cross them. Views are dominated by the flat valley floors, which are framed by surrounding vegetation and rising land. Meandering rivers can be picked out by the lines of riparian trees along their banks. Most valley floors are used for grazing, although there is some arable land use. Popular riverside paths provide access, and the Clyst Valley Regional Park will promote recreational use within this LCT.

## Key Characteristics

**Note:** **Bold** text indicates a Devon-wide characteristic. Not bold indicates a local characteristic

- **Open, flat landform, often with distinct vegetated floodplain edge.** Winding river courses with main channels and smaller tributaries. Active river processes.
- Willows and other riverside trees along river banks and floodplain edges. Occasional patches of wet woodland.
- **Pastoral land use with wet meadows and some arable, with variable field sizes. Hedges, not banks, on the boundaries with rising land.**
- **Watercourses** are valuable semi-natural habitats, providing a range of aquatic and riparian habitats. Watermeadows may also be species-rich.
- Historic bridges (including examples of medieval packhorse bridges) and mills.
- **Very sparsely settled**, with farms along the adjacent to the LCT above the flood plain.
- **Network of narrow winding lanes** in some valleys, but generally access is limited to bridging points and occasional riverside paths. Main roads cross some valleys. In-use and former railway lines (one now a tramway) utilising flat valley floors.
- **Open internally, with views out screened by boundary vegetation.** Long views along valleys, especially from bridges, framed by valley sides.
- Strong sense of tranquillity, particularly away from roads. Strong seasonal changes, particularly during times of flood.
- Simple landscape pattern, particularly distinctive seen in views from higher land.



*Valley floor scene, Yarty Valley*



*The Otter Valley, north of Ottery St Mary.*

## What Makes this Landscape Special

The lack of settlement creates a sense of escape and tranquillity; some valleys popular for recreation.

Its open, simple landscape pattern contrasts with the relatively complex enclosure and settlement patterns of surrounding landscapes.

A dynamic landscape which contains important examples of active river processes such as meander formation, and valuable aquatic and wetland habitats.

Historic bridges, causeways, leat systems and mills, and military structures (e.g. pill boxes and tank traps) in uncluttered landscape settings.



## Forces for change acting on this LCT

### Past and current forces for change

- Flooding, resulting in bank erosion and damage to roads, footpaths, bridges and property. Modern bridges low over rivers are particularly vulnerable.
- Past policies of canalising some rivers and constraining them within straight channels, affecting river flows, flood patterns, habitats and natural processes.
- Low river flows during times of drought or high water abstraction.
- Siltation from soil washing into rivers (particularly where arable land use occurs on floodplains).
- Recreation pressure, as people like to walk near water, but the path system is limited.
- Invasive species, such as Himalayan Balsam.
- Poor water quality due to agricultural practices upstream and around the rivers.
- Change in character of parts of Clyst Valley from agricultural to recreational as a result of Cranbrook development and the Clyst Valley Regional Park.
- Impacts on vegetation following introduction of beavers in the Otter Valley.

### Future forces for change

- Natural Flood Management techniques, aiming to restore the natural character of river systems.
- Climate change leading to increased flooding (rainfall from storms) and river flows. This will in turn lead to further erosion and damage.
- Development pressure, particularly around settlements.
- Unknown landscape impacts of changes to agricultural grant schemes and policies.

### Landscape Aims

Floodplains should remain largely free from development, and be allowed to function more naturally to reduce the impacts of flooding. Integrated management of floodplains and upstream areas should be promoted to improve water quality and reduce flood risk. Planning for recreational use should respect and enhance the open character of the LCT, and opportunities should be sought to improve biodiversity and restore historic floodplain features.



*Change from an agricultural to recreational character in the Clyst valley at Cranbrook*



*Arable agriculture on floodplain, Otter valley*



*Bank erosion on the river Axe.*

## Landscape Guidelines

### Protect

- Historic bridges and other structures, sensitively protecting against flood damage if necessary.
- Floodplains, allowing them to function as naturally as possible.
- The simple pattern and predominantly open quality of this landscape.

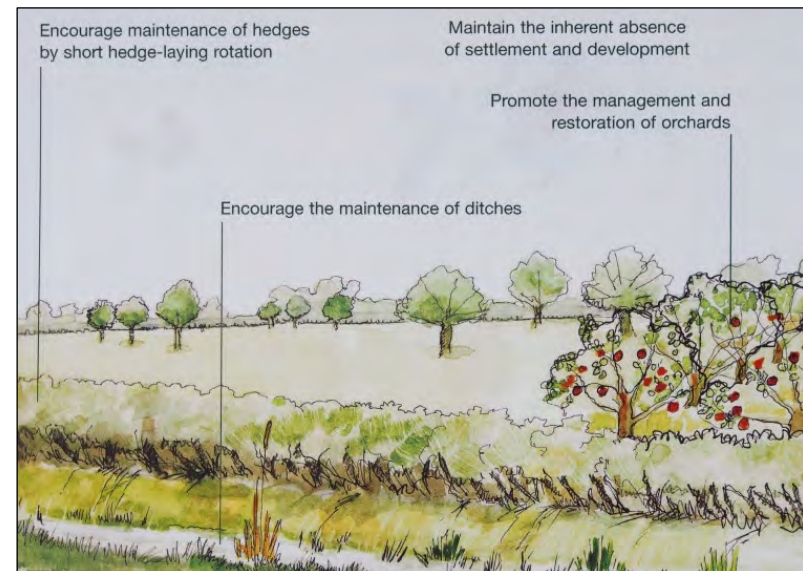
### Manage

- Riverside trees, pollarding and replacing where necessary with locally-indigenous wetland species, to keep river banks stable and provide shade for fish.
- Watercourses, preventing them becoming clogged with vegetation or other debris, but encouraging aquatic plant species, mammals and insects, particularly in ditches. Control Himalayan balsam and other non-native invasive species along waterways.
- Floodplain habitats, exploring the potential to restore watermeadows, and to create wetland habitats. Retain unimproved permanent pasture and wet grassland.
- Hedgerows, especially where they comprise quick growing species, using a shorter laying rotation than elsewhere.

### Plan

- Maintain the current absence of settlement or development in floodplains.
- Incorporate wider Green Infrastructure ambitions and movement networks for people and wildlife, in a sensitive manner. Where it can be done without detriment to fragile habitats, improve recreational access to valley floors, particularly in areas close to settlements. Due to the flat terrain, valley floor routes may be particularly suitable for use by those with disabilities if the path furniture is appropriately designed.
- Support the aspirations of the Clyst Valley Regional Park and promote suitable links with nearby settlements and LCTs.

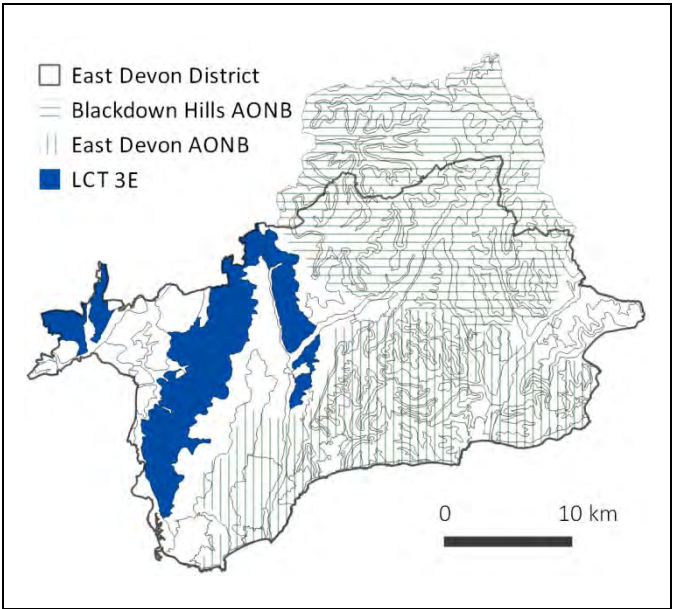
- Develop integrated flooding and water quality solutions (including Natural Flood Management) for floodplains and wider river catchments.
- Support projects to re-naturalise rivers which have been artificially channelled, and promote the natural functioning of floodplains.
- Where there is pressure for tree planting within floodplains, restrict it to the outer edges, keeping the valley floor more open.
- Work with landowners/ managers to reduce the proportion of floodplain land in arable use.
- Work with farmers to encourage sustainable farming practices and land management such as soil aeration, crop selection and hedge reinstatement to reduce, alleviate or slow run-off from agricultural land.
- Identify opportunities to restore historic floodplain features such as watermeadow systems and traditional orchards.
- Consider the immediate setting of the floodplain and the impact of future developments on views from the valley floor.



# LCT 3E: Lowland Plains

Devon Character Areas containing this LCT: Clyst Lowland Farmlands; Exe Estuary and Farmlands

Agenda page 105



A typical view across LCT 3E, looking south-east over Brampford Speke, with the Pebble Bed Heaths forming the distant horizon.

Clyst Lowland Farmlands Devon Character Area

## Description

This LCT occurs on lower land in the western half of the Study Area. It comprises the gently sloping/ undulating land which surrounds the valley floors. This is a medium-large scale settled landscape, with villages and farms displaying a variety of building materials, ages and styles. These include the coastal villages of the Exe Estuary, inland villages and occasional estate farms. Much of the LCT remains rural but parts are influenced by new development at Cranbrook and Exeter Airport, and along transport routes. Fertile red soils are a characteristic and are particularly noticeable where arable land use is dominant. There are surviving pockets of traditional orchards, and areas of pasture, paddocks and small woodlands. Fields are generally surrounded by wide hedgerows, often with mature hedgerow oaks, although some hedgerow loss has occurred. Surrounding higher land provides the visual backdrop, and offers views over the Lowland Plains.



## Key Characteristics

**Note:** **Bold** text indicates a Devon-wide characteristic. Not bold indicates a local characteristic

- **Level to gently sloping or rolling plain** between the valley floors and the start of steeper valley sides.
- **Small discrete woodland blocks**, and pockets of orchard planting, particularly around Whimble.
- **Mixed farmland**, often in arable cultivation. **Regular medium to large field pattern** with local variation, particularly around settlements. Contains some of the most fertile farmland in the study area.
- **Semi-natural habitats include roadside hedges** and hedgerow trees - particularly oaks – streams and pockets of grassland.
- Historic villages, farms and lanes, but some features lost due to ploughing. Notable concentration of historic parklands including veteran trees. Maritime influences on estuary villages.
- **Settled, with a mixed pattern of villages, hamlets and isolated farms. Great variety of building materials and styles, even within single settlements.** Cranbrook is a focal point for contemporary buildings and includes large-scale structures.
- **Variable highway network**, from sparse rural lanes to motorway and A-roads. Relatively few public rights of way.
- **Surprising feeling of remoteness in some parts.** Despite local impacts of development and infrastructure, much of the area retains a pleasant, rural feel.
- Long views over low hedges. **Some views marred by pylons** and other infrastructure.
- Surrounding LCTs (for example Estuary and Pebble Bed Heaths) contribute to views and influence character. Lowland Plains visible from surrounding higher LCTs.



*Lympstone Village, on the Exe Estuary*



*Ancient and veteran parkland trees at Bishop's Court in the Clyst Valley*

## What Makes this Landscape Special

Historic small parks and gardens, containing a high proportion of mature and veteran trees.

The range of settlements and building styles, from sleepy coastal villages to Cranbrook new town.

Its unassuming but still attractive rural feel, particularly away from larger settlements and roads.

Its strong visual relationship with surrounding higher landscapes – the Lowland Plains LCT is often seen from above, and is also visually influenced by surrounding LCTs.

## Forces for change acting on this LCT

### Past and current forces for change

- Cranbrook New Town, with direct influences from building, but also more subtle landscape changes, such as road/ junction upgrades, and impacts of recreation on formerly rural valleys.
- Local impacts of infrastructure, including motorways, roads, pylons, airport and warehousing.
- A concentration of renewable energy schemes, including solar farms (some seen from surrounding high land), biogas plants and associated biomass crops (specifically maize).
- Increased signage along main roads, creating a more urban-fringe feel, particularly on approaches to Exeter.
- Ploughing of Scheduled Monument earthworks on farmland.
- Rise in intensive agriculture resulting in hedgerow and habitat loss.
- Loss of orchards – formerly a traditional land use in this area.
- Poor water quality due to intensive agricultural use.

### Future forces for change

- Continued expansion of residential, industrial & infrastructure development, particularly within Greater Exeter Strategic Plan area, and development pressure along A303 and A3052 corridors.
- Continued increase in light and noise pollution from new developments and transport links.
- Increased recreation pressure as the local population grows.
- Unknown landscape impacts of future changes to agricultural funding and policy.
- Continued decline in water quality and loss of landscape structure and habitats.
- Ash dieback disease affecting hedgerow trees and woodlands.
- Climate change, potentially affecting tree species, water supplies and crop choices.
- Future tree loss may affect opportunities for shaded recreation, potentially impacting health and wellbeing.

### Landscape Aims

In parts of the LCT affected by development or where development is planned, the existing landscape structure and character should be assessed in terms of its value, susceptibility to change & condition. Landscape features worth of retention can help to create high quality, distinctive and functional places, and opportunities should be taken to include these within Green Infrastructure for new built development, and allow for their ongoing management. Elsewhere, the strongly-rural character should be retained. Throughout the LCT, habitats should be enhanced and settlements should retain their distinctive characters.



*Cranbrook New Town*



*Traditional orchard, near Whimble*



*Anaerobic digester near Aunk.*

## Landscape Guidelines

### Protect

- The individual characters of villages and their settings.
- The strongly-rural character which survives in parts of this LCT, particularly further away from Exeter.
- Surviving archaeological sites.

### Manage

- Hedgerows, particularly elm hedges, to help their survival in the face of Dutch Elm disease. Encourage maintenance and planting of hedgerow oaks.
- If necessary, replace lost ash trees, using [best practice guidance](#) to identify locally-appropriate species.
- Historic parkland and associated veteran trees, producing Parkland Management Plans where necessary, and planting new specimen trees to ensure their continued presence in the landscape. Support the 'Great Trees in the Clyst Valley' project.
- Traditional orchards, extending them where possible and promoting use of local or other native varieties.
- Farmland, promoting field edge habitats and connecting grassland and woodland pockets.

### Plan

- Guide large-scale development towards areas with existing access and infrastructure.
- Use the existing landscape structure as the basis for Green Infrastructure and access enhancements, including the proposed Clyst Valley Regional Park. Where possible, use the relatively flat terrain to enable disabled access to the countryside.
- Allow landscape spaces within and around new developments to benefit people, wildlife and the appearance of new development.

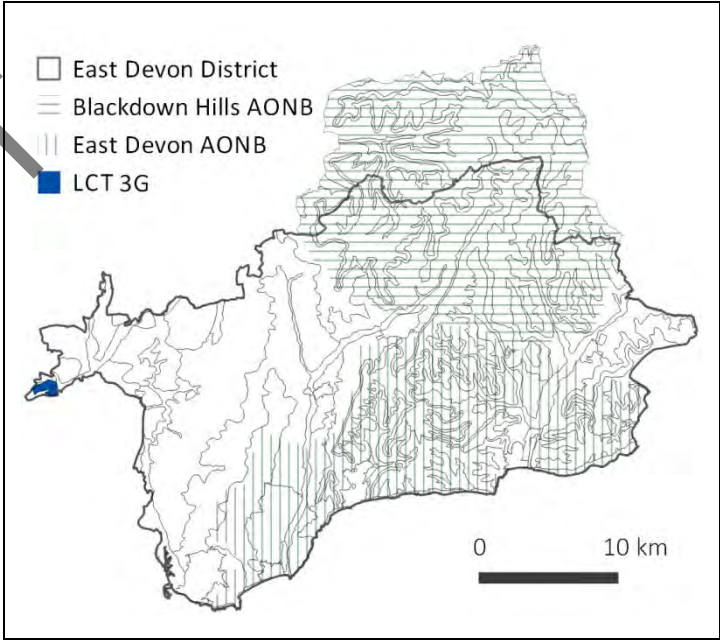
- Where new development is occurring/ planned, integrate it into the existing landscape structure of trees, woodland and hedgerows, to create distinctive and attractive places to live.
- Ameliorate impacts of potential future tree loss, including on recreation sites/routes, to enable continued provision for shaded recreation.
- Consider how proposed developments will appear when viewed from surrounding higher land.
- Prevent linear spread of development along roads where possible.
- Limit unnecessary signage, particularly along rural roads and approaching settlements.
- Allow any new development in villages to respond to locally-distinctive features, building materials etc. to retain the diversity of building and settlement characteristics across the LCT. Pay particular attention to distinctive village approaches and gateways.
- Take account of the area's role as a setting to the AONBs, and its areas of surviving strong rural character.
- Develop catchment-wide management plans (with integrated Green Infrastructure) to improve water quality in rivers and streams.





# LCT 3G: River Valley Slopes and Combes

Devon Character Areas containing this LCT: Exeter Slopes and Hills



A typical view across the LCT 3G in the Star Barton Brook Valley,  
Exeter Slopes and Hills Devon Character Area

## Description

This LCT occurs in a small part of the Study Area north-west of Exeter. It contains steeply sloping valleys, with blocks of woodland and meadows. It feels enclosed and lush, and very tranquil away from the roads at the periphery, particularly because access is limited to farm tracks. There are fast-flowing streams in the valley bottoms, and some small fishing lakes along the Star Barton Brook. Settlement comprises scattered farms and small clusters of houses by the main road at the periphery of the LCT. This is an historic landscape, with a surviving pattern of Barton Fields – semi-regular fields thought to date from the 15<sup>th</sup>- 18<sup>th</sup> Centuries associated with Star Barton Farm. There is also an earthwork enclosure which has been provisionally identified as a medieval moated site.

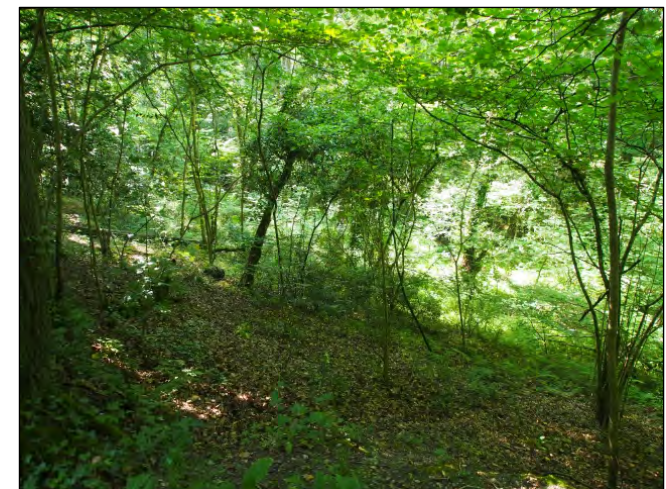
## Key Characteristics

**Note:** **Bold** text indicates a Devon-wide characteristic. Not bold indicates a local characteristic

- **High slopes often forming undulating or rounded hillforms to either side of small narrow valleys.**
- **Broadleaved woodland found on lower slopes, often in discrete small woods or extending to water's edge.**
- **Pastoral** and arable **cultivation in semi-regular small to medium scale fields, with hedgerows and localised market gardening** at the periphery of the area.
- Limited **recreational land use** in the form of pony paddocks and fishing lakes.
- Semi-natural habitats include deciduous woodland, streams, lakes and hedgerows.
- Historic farmsteads and associated Barton field systems. Substantial earthwork thought to be a medieval moated site.
- **Scattering of hamlets or farmsteads**, including historic Barton farm, and cluster of houses near main road at periphery.
- **Sparse road network** within the LCT, although A377 runs along eastern edge. Occasional farm tracks within LCT, and no public rights of way.
- Feels enclosed and tranquil away from the main road, with a sense of changelessness.
- Seasonal changes in colour and texture due to farming patterns and the presence of deciduous woodland and trees.
- Occasional **extensive views** comprising long views out of the LCT along the Exe Valley.
- The LCT contributes to the north-west setting and approach to Exeter, including undeveloped skylines.



*An unsurfaced track provides the only access into the LCT*



*Streamside woodland*

## What Makes this Landscape Special

It comprises a largely intact historic landscape, with a pattern of farms, tracks and fields largely unchanged in several centuries.

The sense of peace, isolation and tranquillity, despite its proximity to Exeter.

It is a traditional Devon landscape, with seasonal variety of colours and textures, which contributes to the undeveloped setting of Exeter.



## Forces for change acting on this LCT

### Past and current forces for change

- Creation of fishing lakes on the Star Barton Brook.
- Small blocks of conifer planting, now reaching maturity.
- Expansion of garden centres on former market garden sites.
- Woodland management may be affected by shooting interests.
- General decline in livestock (particularly dairy) farming in the area, removing the need to maintain stockproof hedgerows.
- Small-scale development on the periphery of the LCT (often well designed and discreetly sited).
- Glimpsed views to infrastructure outside the LCT.

### Future forces for change

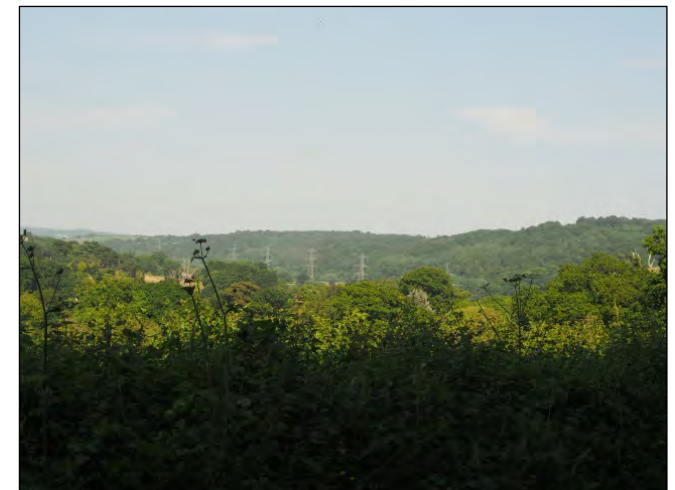
- Development pressure associated with the expansion of Exeter, especially on the periphery of the LCT close to the A377.
- Tree disease, including ash dieback, affecting woodlands and hedgerow trees.
- Risk of invasive species in watercourses.
- Unknown future changes to agricultural grants and policies are likely to impact on farming practices and woodland management.
- Demand for larger and more visually-intrusive farm buildings.
- Increased recreation pressure, particularly as local populations expand.
- Climate change, which is likely to result in increased intensity and frequency of storms, leading to flash flooding, changes in tree species, and changes in agricultural practices and crop choices.

### Landscape Aims

The undeveloped character of the landscape, and its sense of isolation, should be protected. The biodiversity of woodland, farmland and watercourses should be enhanced through holistic management. The historic fabric of the landscape, including field patterns, should be retained, but there may also be opportunities for positive change, such as the planting of new trees and woodlands, and enhanced recreational access to the countryside.



*Fishing lakes on the Star Barton Brook*



*Pylons in the Exe Valley, as seen from the LCT.*



## Landscape Guidelines

### Protect

- Archaeological sites, supporting the geophysical survey of Scheduled Monument to increase understanding of the site.
- Historic field patterns.
- The sense of tranquillity and isolation.

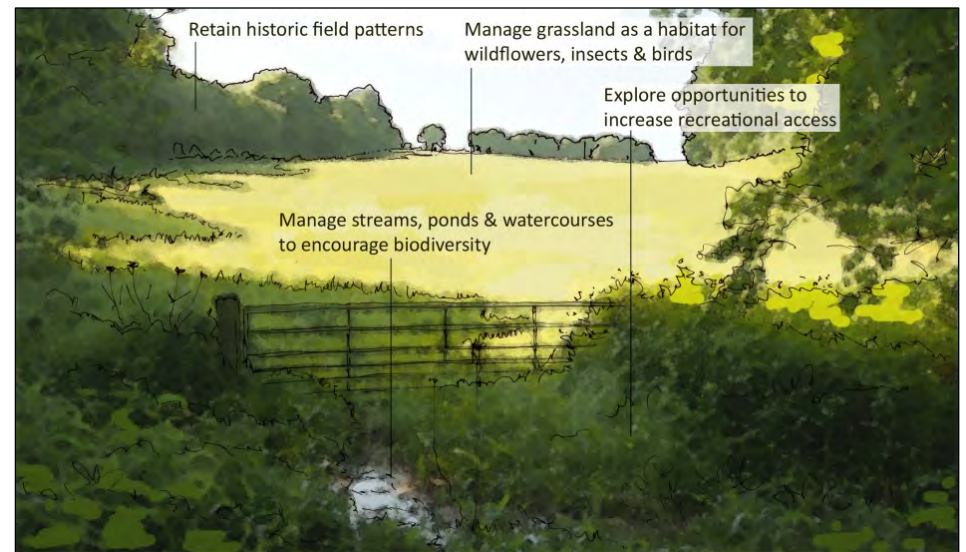
### Manage

- Farmland, to retain landscape structure and enhance biodiversity. Include maintenance of hedgerows, replanting of hedgerow trees, and promoting grassland habitats along field edges.
- Any unimproved grassland, using an appropriate regime of grazing/ cutting to retain and increase its biodiversity of plant and insect species.
- Woodlands, aiming for a diversity of ages and species. Look for opportunities to link woodland habitats through enhanced hedgerows and tree belts. Where conifer blocks are reaching maturity, they should be replaced with broadleaved tree species. If necessary replace lost ash trees, using [best practice guidance](#) to identify locally-appropriate species.
- Shooting, promoting good practice to minimise biodiversity impacts on woodlands.
- Streams, ponds and watercourses, considering their potential role in reducing flooding downstream. Plant appropriate native riparian vegetation, and remove any invasive species.

### Plan

- Retain the undeveloped character of the core of the LCT.
- If new development is proposed at the periphery, ensure that it is absorbed within the existing landscape structure of hedgerows, and enhance this structure if necessary.

- Any new development at the periphery should be in the context and scale of existing buildings.
- Consider the role of this LCT as part of the rural setting and approach to Exeter.
- Explore opportunities to increase woodland cover where this can be done without loss of unimproved grassland.
- Explore opportunities for recreational access, including new footpaths which enable people to enjoy this attractive countryside close to the city.
- Resist development of buildings or other structures which would be seen against the undeveloped skyline of the LCT.



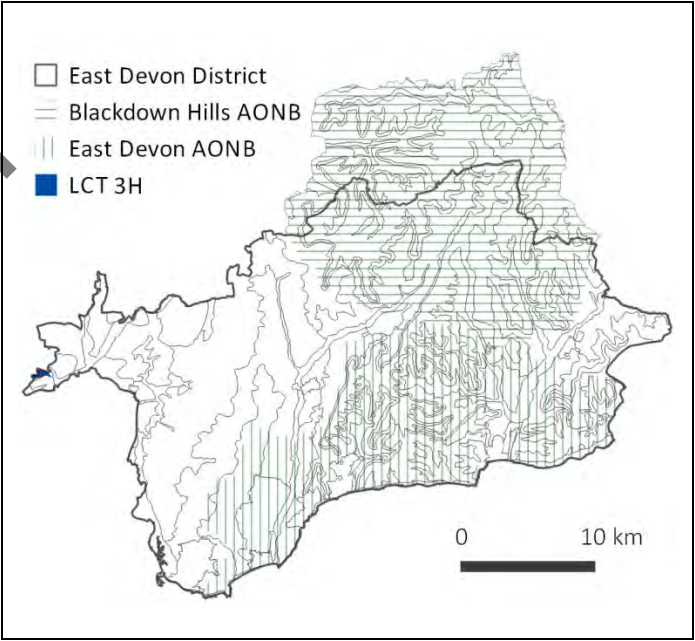
# LCT 3H: Secluded Valleys

Devon Character Areas containing this LCT: Exeter Slopes and Hills

Agenda page 113



A typical view within the LCT 3H in the Duryard Brook Valley, Exeter Slopes and Hills Devon Character Area



## Description

This LCT occurs in a very small area in the far west of the Study Area, north-west of Exeter. It is unsettled, and a farm track provides the only access. The LCT comprises a steep-sided valley and contains a mosaic of habitats including meadows, wet ground, woodland (some ancient) and a stream. The sinuous, tree-lined Duryard Brook runs along the valley floor. The inaccessibility of the LCT means that it has a strong sense of tranquillity, and there is also a strong sense of enclosure and seclusion, because the steep topography blocks views out of the valley. The LCT contributes to the rural setting and approach to Exeter, particularly the ridge along the northern edge of the LCT.



## Key Characteristics

**Note:** **Bold** text indicates a Devon-wide characteristic. Not bold indicates a local characteristic

- **Steep valley landform with narrow valley floor.** Slopes are convex at the top and concave at the base.
- Deciduous woodland blocks on steep valley sides, including ancient woodland at Duryardwood Copse. Also hedgerow and riparian trees which add to the well-treed appearance of the landscape.
- Predominantly pastoral farmland and woodland, with irregular, medium-sized fields divided by thick hedgerows.
- Semi-natural habitats include **damp, species-rich fields, small streams, overhanging trees and small woodlands** (including oak-dominated ancient woodland).
- Ford over Duryardwood Brook.
- Unsettled within the LCT, although there are scattered farms/ dwellings just beyond the LCT boundary.
- Largely inaccessible, with only one private farm track through the LCT, and a public footpath along the northern boundary.
- **Topography helps to enclose and separate these areas from the wider landscape.**
- **Secluded character**, with a tranquil and secretive feel.
- Seasonal variations in colour and texture from the deciduous woodland and hedgerows.
- The LCT contributes to the north-west setting and approach to Exeter, including undeveloped ridgeline along northern edge.



*The LCT as glimpsed from the valley to the south.*



*Duryardwood Copse ancient woodland*

## What Makes this Landscape Special

A mosaic of habitats, including species-rich ancient woodland, streams, wet grassland, pasture and hedgerows.

The sense of tranquillity and seclusion (enhanced by topography and inaccessibility) despite its proximity to Exeter.

Its role in the setting and approach to Exeter, particularly the undeveloped ridge which forms the northern boundary of the LCT.



## Forces for change acting on this LCT

### Past and current forces for change

- Woodland management may be affected by shooting interests.
- General decline in traditional woodland management such as coppicing, affecting the structure, age and species mix of woodlands.
- General decline in livestock (particularly dairy) farming in the area, potentially removing the need to maintain stockproof hedgerows.
- Tree loss to the north of Duryardwood Copse.

### Future forces for change

- Development pressure associated with the expansion of Exeter, especially to the east of the LCT close to the A377.
- Tree disease, including ash dieback, affecting woodlands and hedgerow trees.
- Risk of invasive species in watercourses.
- Farming practices potentially impacting on water quality downstream.
- Unknown future changes to agricultural grants and policies are likely to impact on farming practices and woodland management.
- Demand for larger and more visually-intrusive farm buildings.
- Climate change, which is likely to result in increased intensity and frequency of storms, leading to flash flooding, changes in tree species, and changes in agricultural practices and crop choices.

### Landscape Aims

The mosaic of habitats, including woodlands, wet pasture, meadows, hedgerows and streams should be maintained, as the inaccessibility of the landscape means wildlife is undisturbed. Woodland should be actively managed to promote age and species diversity. This is particularly important in the species-rich ancient woodland in order to protect this important habitat. The isolated and unsettled feel of the LCT should be retained, and it should continue to contribute to Exeter's rural and undeveloped setting and approach.

## Landscape Guidelines

### Protect

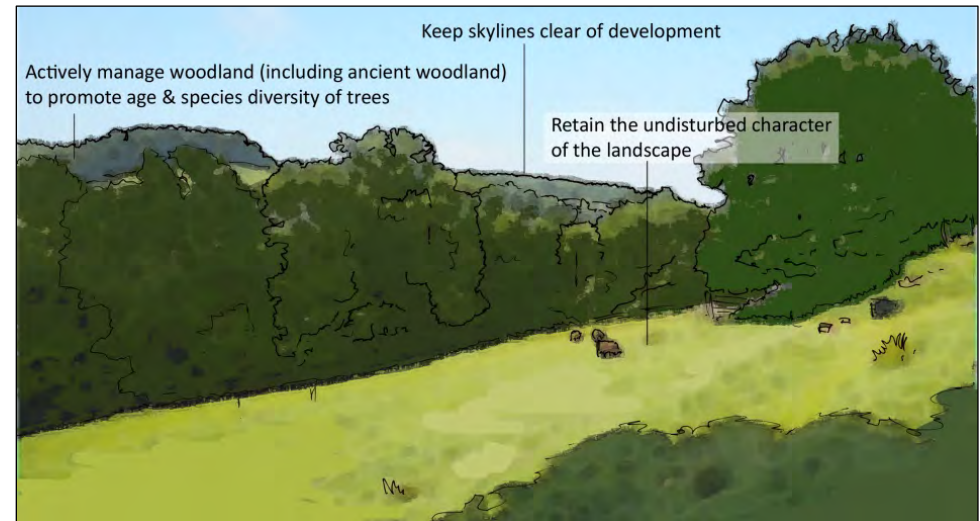
- The area's secretive and isolated feel, and its sense of tranquillity.

### Manage

- Farmland, to retain landscape structure and enhance biodiversity. Include maintenance of hedgerows, replanting of hedgerow trees, linking woodland habitats.
- Any unimproved / wet grassland, using an appropriate regime of grazing/ cutting to retain and increase its biodiversity of plant and insect species.
- Woodlands, including ancient woodland. Where possible, consider traditional woodland management such as coppicing to enhance age and species diversity. When replanting, use native seed if possible. If necessary replace lost ash trees, using [best practice guidance](#) to identify locally-appropriate species.
- Shooting, promoting good practice to minimise biodiversity impacts on woodlands.
- Streams and watercourses, considering their potential role in reducing flooding downstream. Plant appropriate native riparian vegetation, and remove any invasive species.

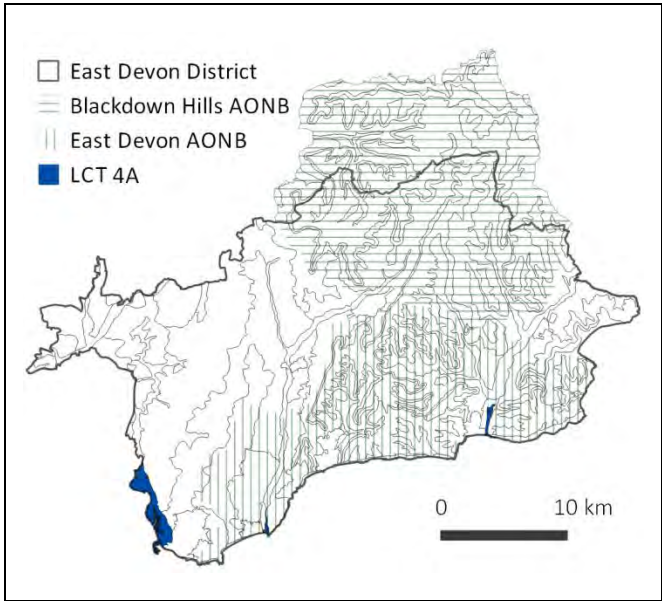
### Plan

- Retain the undeveloped character of the LCT.
- If new development is proposed beyond the LCT which may impact on it, provide appropriate native tree screening if the existing landscape structure of hedgerows and trees is not sufficient.
- Consider the role of this LCT as part of the rural setting and approach to Exeter.
- Resist development of buildings or other structures which would be seen against the undeveloped skyline of the LCT.
- Explore opportunities to increase woodland cover where this can be done without loss of unimproved grassland.
- Discourage public access into the LCT, so that it can continue to be a haven for wildlife which can remain undisturbed.



# LCT 4A: Estuaries

Devon Character Areas containing this LCT: Exe Estuary and Farmlands



*A typical view across LCT 4A, looking south along the Exe Estuary from Exton Station.  
Exe Estuary and Farmlands Devon Character Area.*

## Description

This LCT occurs in the south and south-west of the Study Area and is associated with the Exe, Axe and Otter Estuaries. It comprises the open water, channels and intertidal zones associated with river mouths. Intertidal mudflats, sand and saltmarsh provide a range of habitats for wading birds, and the Exe Estuary is internationally designated for its nature conservation importance. This is a dynamic landscape, with its appearance constantly changing with tides, weather and seasons. It has a peaceful and expansive feel, with the broad, flat estuaries framed by the rising land on either side, and reflecting the colours of the wide skies above. Its scale is relatively large, and its character is influenced by the surrounding higher land. The Estuaries have a strongly coastal feel, both visually and due to other perceptual qualities such as the smell of the sea and sounds of seabirds. The LCT itself is unsettled, although there are adjacent settlements on the shores of the estuaries. There are few roads or rights of way within the LCT, but footpaths, railway lines and the Seaton tramway follow the shoreline and have views across the estuaries.



## Key Characteristics

**Note:** **Bold** text indicates a Devon-wide characteristic. Not bold indicates a local characteristic

- Estuaries opening out onto south coast.  
**Covered with shallow water at high tide, with creeks and tidal rivers highly influenced by prevailing tidal condition.** Shingle spits/ beaches at the mouths of the Axe and Otter estuaries.
- River channels can be narrow and shifting, with strong tidal flows.
- Areas defined by permanently dry land to east and west. Red sandstone headlands are distinctive features.
- No tree cover within LCT, although trees on headlands (including Estate planting) add to character.
- **Semi-natural habitats include extensive mudflats**, with areas of **sandbanks**, mudflats and saltmarsh, supporting a range of wildlife.
- **Unsettled, but influenced by adjacent towns.**
- **Small quays and jetties found along the shoreline, often associated with settlements.** Adjacent railway/ tram lines and bridges.
- **Few roads or public rights of way within the LCT**, but South West Coast Path, cycle routes, Tramway & Exe Valley Railway line run adjacent. Exe is well-used for water-based recreation, with **majority of boat traffic comprising small recreational boats**
- **Mainly tranquil away from major settlements, with strong sensory characteristics.** Distinctive views of Exe from trains and stations.
- **An open and expensive landscape, with large skies.** Church towers (particularly at Exmouth) are skyline features.



*The Otter Estuary, with pine trees planted by the Bickton Estate providing skyline features and interesting reflections*



*The Axe Estuary at Seaton.*

## What Makes this Landscape Special

A range of intertidal habitats (some internationally designated for their conservation importance), including mudflats, saltmarsh and sandbanks, supporting major populations of wading birds and rare plants and flowers.

It forms a visual focus for surrounding settlements and LCTs, and is a highly valued and visually attractive landscape. It also contributes to the setting of the Jurassic Coast World Heritage Site.

Its recreational importance, including water-based recreation, footpaths, trails, trains, trams and local nature reserves, which enable people to see, engage with and explore this landscape.

Its dynamic character, constantly changing in response to changing tides, weather and season.

## Forces for change acting on this LCT

### Past and current forces for change

- Coastal erosion of beaches, headlands and banks.
- Coastal flooding, threatening properties, farmland and footpaths.
- Poor water quality, resulting from both agricultural practices and discharge into rivers.
- Issues with invasive species which spread along river channels. This is a particular problem in rivers with large catchments which are therefore difficult to regulate.
- Impacts of recreation, including disturbance of birds by walkers and boaters.
- Adjacent urban development (particularly in the Axe Estuary) affecting character.
- Changes in character of adjacent landscapes (e.g. tree loss) affecting views from the estuaries.

### Future forces for change

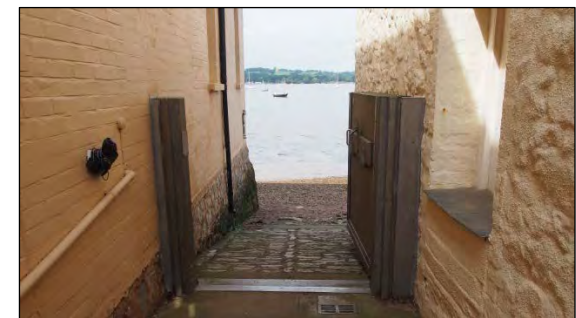
- Increased rates of coastal erosion due to effects of climate change, including sea level rise, and more violent storms.
- Increased riverine and coastal flooding due to climate change and associated sea level rise. Risk of failure of embankments in the Otter Estuary.
- Waterside development at mouth of Axe (townhouses) will impact on character of the estuary.
- Continued settlement expansion adjacent to the estuaries changing their context and character.
- Demand for visually-intrusive flood barriers and coastal defences.
- Positive management changes through active management and larger-scale change, e.g. the Lower Otter Restoration Project, which aims to restore the valley closer to its natural state, enhance wildlife habitats and to retain public access.
- Positive management following designation of the Axe and Otter Estuaries as Marine Conservation Zones, and implementation of the Exe Estuary Management Plan.

### Landscape Aims

The Estuaries should be managed in a holistic way, balancing the requirements of nature conservation and recreation, and making them more resilient to the impacts of climate change and sea level rise. Their settings should be enhanced, and habitats expanded where possible.



*Rock armour protecting eroding headland, Exe Estuary*



*Discreet flood gates protecting properties at Lympstone*



*Proposed waterfront development, Axe Estuary*

## Landscape Guidelines

### Protect

- Distinctive skyline features which contribute to the setting and character of the Estuaries, (for example Exmouth church tower, and the pine trees on the eastern side of the Otter Estuary).
- Intertidal habitats (e.g. saltmarsh, mudflats, sandbanks) many of which are nationally/ internationally designated for their wildlife conservation importance.
- The setting of the Jurassic Coast World Heritage Site.

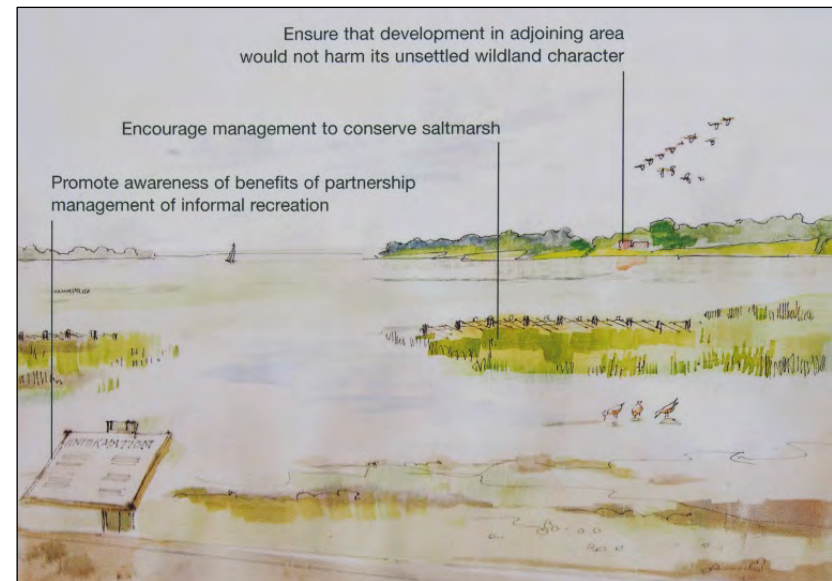
### Manage

- Habitats, in accordance with *SSSI Management Plans*, the *Exe Estuary Management Plan* and *Marine Conservation Area Management Plans*.
- Recreation, zoning where necessary to protect the most sensitive nature conservation sites (in accordance with Management Plans). Follow guidance from the Exe Estuary Partnership regarding bait collecting; dog walking; Personal Water Craft; shore use and water use.
- Footpaths and trails along the margins of the estuaries, providing interpretation where appropriate. Encourage disabled access on paths over flat terrain, and minimise disturbance to fragile habitats.
- Surrounding farmland (in other LCTs) to improve water quality and minimise the spread of invasive species along watercourses.

### Plan

- Retain the inherently unsettled and open character of the LCT.
- Avoid expansion of development in surrounding settlements which will have a negative impact on views of/ from the Estuaries.
- Consider the landscape impacts of flood barriers and coastal defences, and work with engineers where necessary to develop schemes which are as sensitive as possible to their location.

- Promote sustainable leisure and recreation facilities where appropriate, to enable people to see and access the LCT but without damaging fragile habitats.
- Support opportunities to re-naturalise the Otter Estuary, as set out in the *Lower Otter Restoration Plan*. Recommended measures impacting on this LCT include removal of river embankment to reconnect the river with its floodplain, expansion of estuarine habitats, protection of paths against flooding, and new footbridges.
- Develop catchment-wide measures to improve water quality through minimisation of agricultural pollution.
- Encourage underwater archaeology within the estuaries, and along riverbanks, to increase understanding of historic land/river uses and to prevent loss of archaeological heritage through dredging or erosion.
- Refer to relevant Objectives, Policies and Aims in the South Marine Plan.





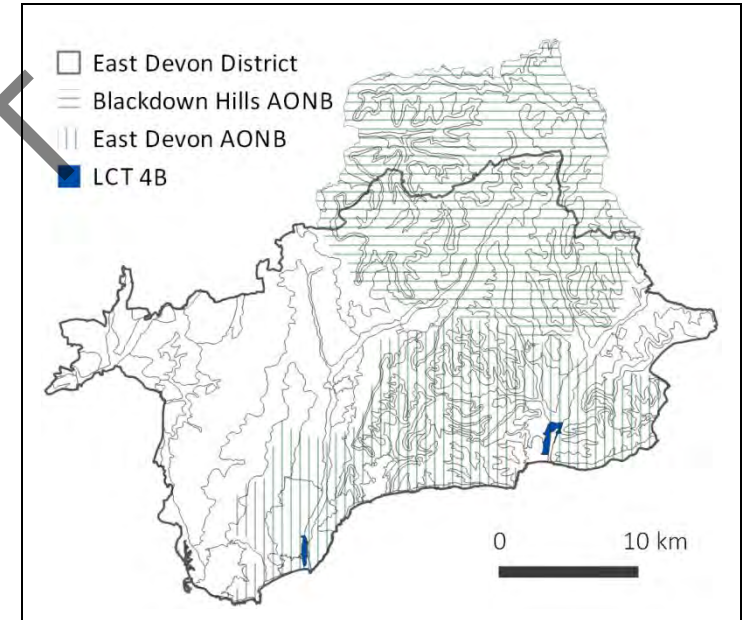
## LCT 4B: Marine Levels and Coastal Plains

Devon Character Areas containing this LCT: Axe Valley; Sidmouth and Lyme Bay Coastal Plateau



A typical view across LCT 4B in the Axe Valley

Axe Valley Devon Character Area



### Description

This coastal LCT occurs towards the mouths of the rivers Axe and Otter, and is associated with the Axe and Otter Estuaries. It contains wetlands and re-claimed farmlands which are influenced by marine characteristics, but today are not generally affected by tidal changes. Saline influence limits agricultural cultivation and settlement, so the landscape has an open and unsettled feel. Valuable wildlife habitats include ditches, grazing marsh, open water and reedbeds. Nature reserves and paths offer public access, and the landscape can also be enjoyed from the Seaton Electric Tramway. Although it is relatively small in area, it is a highly distinctive landscape often strongly influenced by adjacent estuaries and changing with weather, light and tides. Its strong sense of place is enhanced by awareness of the sea in sights, sounds and smells. The surrounding higher landscapes (for example the wooded hill on the eastern side of the Axe, and the pine-clad sandstone headland at Budleigh Salterton) contribute to its character.

## Key Characteristics

**Note:** **Bold** text indicates a Devon-wide characteristic. Not bold indicates a local characteristic

- **Flat land** and open water **within a floodplain, based on alluvial or tidal deposits**, and containing some reclaimed farmland in areas formerly estuary.
- **Vegetation influenced by coastal conditions, with some hedges but limited tree cover.**
- **Largely unenclosed**, with some pasture on reclaimed grazing marsh divided by ditches. Extensive informal recreational use, including nature reserves.
- **Habitats of national importance include coastal grasslands, reedbeds, open water and grazing marsh.**
- Non-designated archaeological sites including lime kilns, former ports (e.g. East Budleigh) and medieval saltworking sites. .
- **Largely unsettled**, due to flooding.
- No roads within the LCT, although some run along the periphery. Recreational routes include the South West Coast Path, and Seaton Electric Tramway. Evidence of historic use for water transport.
- Parts are exceptionally tranquil, however, in some locations, **the proximity of roads and settlements in adjoining areas reduces tranquillity.**
- **Strong sensory characteristics: colour and texture of marshes, reeds and water, smell of water, nearby saltmarsh and mudflats, sound of birdcalls, reflecting sunlight and seasonal inundation.**
- **Flat, expansive landscape with a feeling of space and long views**, especially along valleys.



*Reed-fringed ditches separating fields of reclaimed farmland in the Otter Valley. Note Bicton Estate planting on the river-cliff and horizon.*



*Seaton Marshes Nature Reserve in the Axe Valley*

## What Makes this Landscape Special

A rich mosaic of coastal/ wetland habitats with a high conservation value, including relatively rare habitats such as grazing marsh.

A unique and distinctive unsettled landscape with a strong sense of place. This is enhanced by the perceptual qualities of sights, sounds and smells. The adjacent LCTs which form its setting enhance its character, and this LCT also contributes to the setting of the Jurassic Coast World Heritage Site.

A landscape popular for recreation which can be accessed and enjoyed. The footpath alongside the Otter between Budleigh Salterton and Otterton is one of the most popular in the County.

## Forces for change acting on this LCT

### Past and current forces for change

- Reclamation of estuaries for farmland in the 18<sup>th</sup> / 19<sup>th</sup> Century.
- Use of land in Otter Valley for municipal tip in the 20<sup>th</sup> Century.
- Recent and ongoing development on the Axe Valley coastal plain at Seaton.
- Adjacent development and roads impacting on character and tranquillity.
- Positive management of the Axe Valley Nature Reserve and enhancement/ extension of coastal wetland habitats.
- Clearance of vegetation on former tip site, as part of the Otter Valley Restoration Plan.

### Future forces for change

- Increased riverine and coastal flooding due to climate change and associated sea level rise. Risk of catastrophic failure of embankments in the Otter Estuary, potentially affecting farmland, footpath access, and the cricket club.
- Risk of increased salinisation of farmland as a result of sea level rise or breaches of sea defences.
- Positive management through the Lower Otter Restoration Project, which aims to remove artificial banks along the river, and allow natural floodplain processes and estuarine habitats in areas of current reclaimed farmland. Public access routes would also be protected.
- Continued expansion of wetland habitats and visitor facilities in nature reserve sites in the Axe Valley.

### Landscape Aims

Opportunities should be sought to enhance the biodiversity, natural floodplain function and recreational potential of this LCT. This should be achieved through expansion of neighbouring estuarine and/ or wetland habitats where appropriate, along with traditional management of grazing land and improved sustainable access routes. The current unsettled and open character of the landscape should be retained. Adjacent development should not be detrimental to the character of the LCT, and its distinctive settings should be protected.



*Site of former municipal tip, Otter Valley*



*New development on former coastal plain at Seaton (now classified as 'urban')*



*Area of the Lower Otter Restoration Project*



## Landscape Guidelines

### Protect

- Historic sites, e.g. military structures and historic transport sites, even if undesignated. These should include maritime sites associated with river transport.
- Distinctive settings which contribute to the character of the LCT, including wooded valley sides and treed headlands.
- The setting of the Jurassic Coast World Heritage Site.

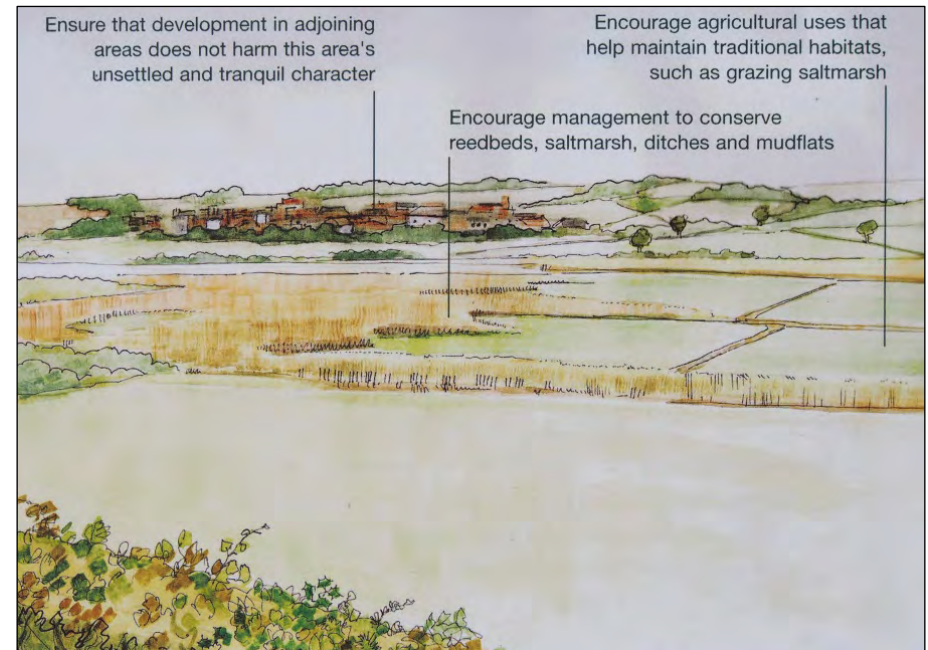
### Manage

- Farmland, using traditional management of grazing marshes, and maintaining ditches which act as field boundaries.
- Wetland and reedbed habitats to encourage wildlife diversity. Encourage expansion of adjacent estuarine habitats into this LCT where possible.
- Waterways, controlling Himalayan balsam and other non-native invasive species.
- Footpaths and trails, promoting disabled access where terrain permits. Encourage improved public access into the lower parts of the Axe Valley, potentially connecting Nature Reserve sites and reducing dependency on car use.

### Plan

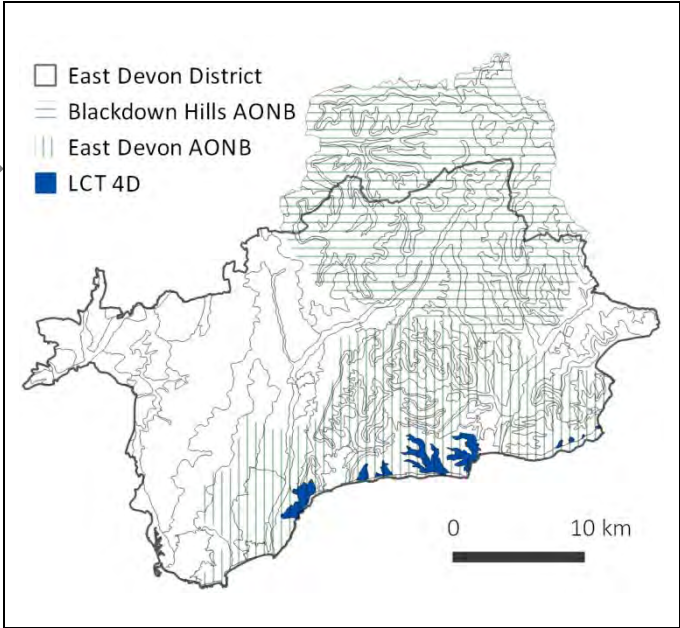
- Retain the currently undeveloped and open character of this LCT.
- Ensure that development in adjoining settlements and LCTs does not affect the unsettled and open character of the Marine levels and coastal plains.
- Where development has occurred on the periphery of the LCT, create a strong planted edge between the LCT and adjacent settlements.
- Enhance existing footpaths and routes, and add new links where possible to enable sustainable access into the heart of the LCT.

- Support opportunities to re-naturalise the Otter Estuary, as set out in the *Lower Otter Restoration Plan*. Recommended measures impacting on this LCT include removal of the river embankment to reconnect the river with its floodplain, expansion of estuarine habitats, protection of paths against flooding, new footbridges, and protection of the former municipal tip.
- Work with landowners/ managers within the LCT to identify means of reducing diffuse pollution into watercourses.
- Refer to relevant Objectives, Policies and Aims in the South Marine Plan.



# LCT 4D: Coastal Slopes and Combes

Devon Character Areas containing this LCT: Sidmouth and Lyme Bay Coastal Plateau



A typical view across LCT 4D, looking up the Branscombe Valley from the lane to the beach.

Sidmouth and Lyme Bay Coastal Plateau Devon Character Area

## Description

This LCT occurs in the central coastal part of the Study Area. It comprises a series of incised branching valleys which run down to pebbly bays at the coast. Some combes contain historic settlements (e.g. Beer, Branscombe and Salcombe Regis) which have concentrations of attractive vernacular buildings within historic landscape settings. There is also often a tourism influence, particularly where there is access to the coast. Many valleys are narrow and steep, with well-wooded upper slopes and remnant orchards. Others are more gently sloping, with more scrubby, open character, especially along their upper boundaries. An irregular patchwork of hedged fields and woodland covers the sides of the combes, which are accessed by steep, narrow and sunken lanes. There are spectacular views from the tops of the valleys, and from High Peak, which is itself a landmark. The South West Coast Path connects the southern ends of the combes and provides exhilarating views of the combes and the coast.



## Key Characteristics

**Note:** **Bold** text indicates a Devon-wide characteristic. Not bold indicates a local characteristic

- **Multiple branching valleys that can range from narrow and steep including scarp slopes to more open shallow systems.** Underlying Beer Limestone a highly-valued material for building and carving.
- **Broadleaved woodland, dominant in places,** particularly along valley tops and along watercourses. Occasional remnant orchards.
- Mix of unenclosed woodland **and small to medium irregular fields marked by low hedgebanks.** Mainly pasture, with pockets of wet pasture and scrub.
- Semi-natural habitats include grassland, woodland, scrub, wet pasture and caves.
- Long history of settlement, with surviving historic buildings, lanes and field patterns. Prehistoric and Roman finds on High Peak, landscaped as part of the Bicton Estate.
- **Old settlements in combes, with stone and locally flint as dominant building material.** Settlement pattern varies and includes dispersed and nucleated villages. Beer is an historic fishing village.
- **Extensive coastal rights of way** (including South West Coast Path) **with steep paths down to beaches. Narrow, winding roads and limited vehicle access to coast.**
- **Coastal influence in exposure, vegetation and extensive views. High, open and exhilarating on top slopes, grading to intimate and enclosed in lower valleys.**
- Sense of timelessness in parts, although also awareness of traffic and tourist influences, particularly in summer.
- Coastal views, with High Peak both a viewpoint and a focal point with artistic associations.

## What Makes this Landscape Special

Awareness of landform and underlying geology, including Beer Limestone and flint seen in buildings and walls, and red sandstone seen in cliffs and road cuttings. Partly within Jurassic Coast World Heritage Site, and containing extensive geological SSSIs which are also SAC bat habitats.

Attractive historic villages in combe floors, with buildings comfortably integrated into the landscape. A concentration of historic buildings, including houses, churches, inns, farms, fishing infrastructure and a forge, set within a landscape of winding lanes, medieval field patterns and dramatic cliffs.

Coastal views and character, appreciated by visitors and artists since the early C. 19<sup>th</sup> and contributing to the setting to the Jurassic Coast World Heritage Site.



*Beer village, with fishing boats pulled up on the pebble beach*



*House built of Beer Limestone*



## Forces for change acting on this LCT

### Past and current forces for change

- Tourism and recreation infrastructure (e.g. caravan sites; car parks) and associated signage, especially in coastal areas.
- Damage to banks and verges due to wide farm machinery, and traffic on narrow lanes (particularly during summer holiday season).
- Neglect of some historic buildings.
- Limestone quarrying, particularly around Beer.
- Coastal erosion and flooding, resulting in loss of coastal land, and the diversion of the South West Coast Path inland.
- Changing farming patterns, including a decline in small-scale dairy farming, reducing the need for pastoral fields and stockproof hedges. Loss of orchards.
- Loss of grassland due to encroachment by gorse and scrub, and decline in traditional woodland management.

### Future forces for change

- Continued pressure from recreation and tourism development and infrastructure.
- Potential impacts from Coastal Change Management, including accommodating development at risk from coastal erosion.
- Spreading room associated with England Coast Path potentially resulting in land use change along clifftops.
- Unknown landscape impacts of future changes to agricultural and fisheries grants and policies.
- Increased frequency and intensity of coastal storms and flooding as a result of climate change, potentially affecting vegetation and land use choices, and increasing coastal erosion rates.
- Tree loss, with ash dieback a particular concern as there is a high proportion of ash in this LCT. Tree loss may also potentially affect shade for outdoor recreation.

### Landscape Aims

Retain the distinctive local character of settlements, including the working fishing beach at Beer. The surrounding agricultural landscape, rich in history and biodiversity, should remain managed and valued. Recreation and tourism should be carefully accommodated so settlements can thrive, and people are able to enjoy the landscape, coast and views.



*Coastal signage and other visual clutter*



*Fishing sheds, Beer*



*Coast Path at Branscombe.*

*(Photo credit: East Devon AONB)*

## Landscape Guidelines

### Protect

- Historic buildings and their settings, with reference to National Trust Management Plans where relevant. Non-designated buildings are particularly vulnerable.
- The patchwork field patterns which provide the settings to villages.
- The High Peak skyline, as a local landmark and part of the designed landscape of the Bicton Estate.
- The setting of the Jurassic Coast World Heritage Site.

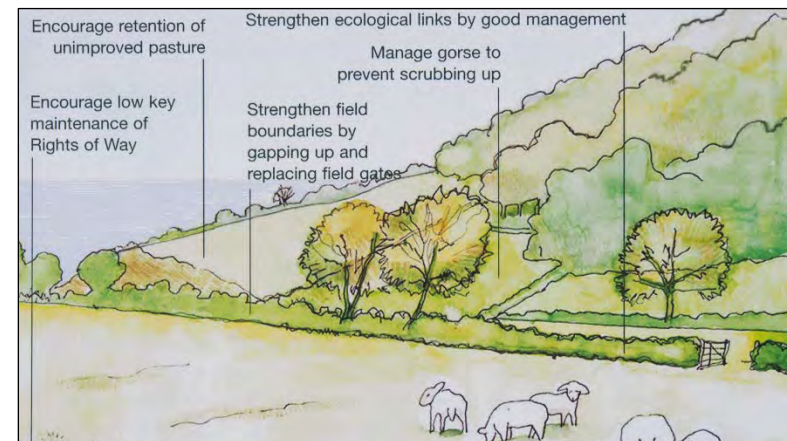
### Manage

- Field boundaries to retain field patterns, including maintenance of earth banks and tree rows, gapping-up hedges and promoting traditional hedgerow management.
- Grassland, grazing or cutting prevent gorse and scrub encroachment.
- Woodland, aiming for diversity of age and species, and using local seed and traditional techniques such as coppicing where possible. Identify opportunities to link woodland areas using hedgerows, copses and tree belts which respect the landscape pattern. If necessary replace lost ash trees, using [best practice guidance](#) to identify locally-appropriate species.
- Surviving orchards, expanding them where possible.

### Plan

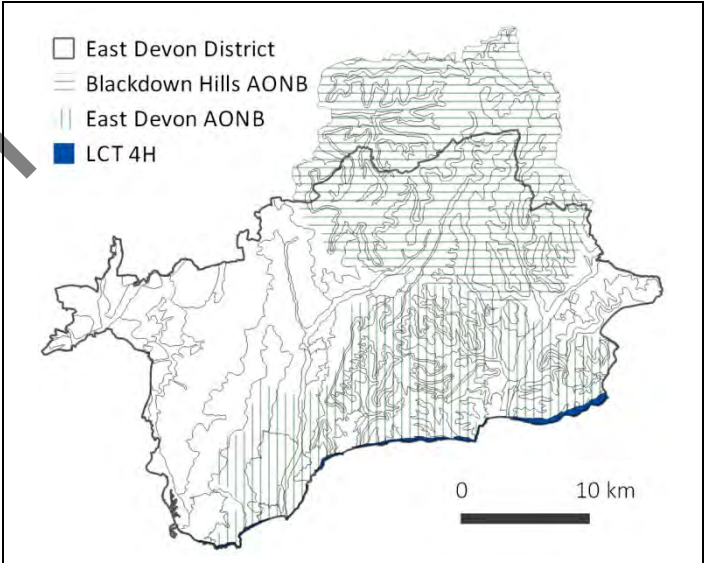
- Retain the inherent pattern of sparse settlement.
- Any new development should be small in scale, and respect its context in terms of settlement form, building style, scale and materials. Existing settlement character varies across the LCT.
- Retain the positive relationship between buildings and topography, with buildings nestled in valley floors, and often constructed parallel to the contours. Retain the character of narrow lanes.

- Ensure tourism development is of appropriate scale and character, and does not impact negatively on the tranquillity or views of the adjacent Cliffs LCT.
- Resist expansion of coastal campsites which can be seen in coastal views, and encourage sites to enhance their landscape settings.
- If new agricultural buildings are required, ensure they are set low within the landscape, and are constructed of visually-recessive and non-reflective materials. Avoid lightspill from yards and buildings.
- Encourage Beer to remain a working fishing village, supporting the restoration and provision of fishing infrastructure.
- Work with quarry companies to develop management and restoration plans which enhance landscape character & biodiversity.
- Consider a summer 'park and ride' scheme to reduce tourist traffic on narrow roads into Beer.
- Consider circular footpath routes from villages and the South West Coast Path/ England Coast Path which enable people to explore the LCT without using cars.
- Refer to relevant Objectives, Policies and Aims in the South Marine Plan.



# LCT 4H: Cliffs

Devon Character Areas containing this LCT: Sidmouth and Lyme Bay Coastal Plateau



A typical view of LCT 4H, showing white limestone and red sandstone layers, looking east from Seaton beach.  
Sidmouth and Lyme Bay Coastal Plateau Devon Character Area

## Description

This dramatic, colourful and distinctive LCT occurs forms the coastal margin along the southern edge of the Study Area. It is one of the most easily recognised LCTs, and includes white limestone cliffs in the east and distinctive red sandstone cliffs and headlands in the west. In the central part, the cliffs are banded. It is of great geological significance, and within the Jurassic Coast World Heritage Site. Some sections of the cliffs are near-vertical, whilst other sections are slumped, or contain offshore rocks. Shingle beaches, in places steeply shelved, run at the base of the cliffs, with wave-graded pebbles and cobbles forming an important natural sea defence. Some stretches of the cliffs are vegetated, including by succulent non-native plants. Self-sown field-maple/ ash woodland has established on landslips at the eastern end of the study area, with a fern ground cover in darker parts. This is a rare example of a landscape where nature is in control. The cliffs are unsettled and dynamic, and exhibit a range of coastal processes. Access is limited to the South West Coast Path, which runs in an exposed location along the cliff tops and provides spectacular views of the cliffs and coast.



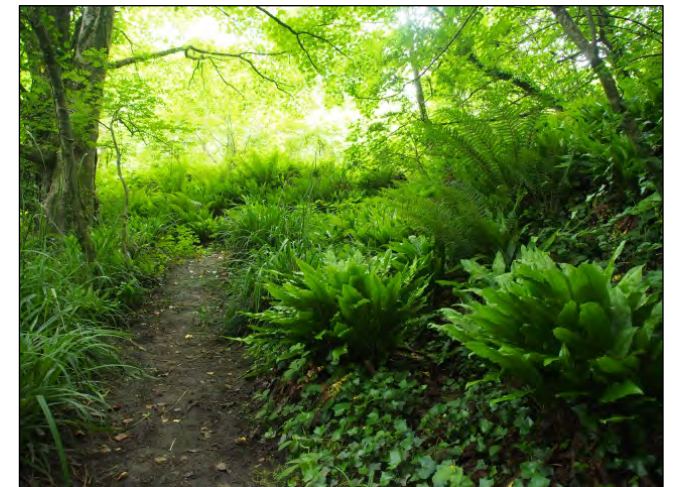
## Key Characteristics

**Note:** **Bold** text indicates a Devon-wide characteristic. Not bold indicates a local characteristic

- **Steeply-sloping cliffs of varying heights, nearly vertical in places;** slopes shallower elsewhere due to landslips. **Narrow shingle beaches at base of cliffs.**
- A dynamic landscape, with **distinctive landforms and rock stratifications** related to limestone and sandstone geology which extends inland and out to sea.
- **Predominantly treeless,** although the eastern end of the study area is densely vegetated, with deciduous woodland and fern-rich groundcover.
- **Unenclosed,** with occasional surviving examples of undercliff 'platts' used for vegetable growing.
- **Cliff faces support important breeding colonies of seabirds,** and succulent plants. Local examples of extensively vegetated slumped landslips on lower half of cliff.
- Remains of prehistoric barrows on cliff tops, also industrial remains (e.g. limekilns) and military archaeology.
- **Unsettled**
- **Accessible only along cliff top** via South West Coast Path, **or in some places along beach.**
- **Extensive and sometimes wild, with dominant marine influence and high levels of tranquillity** and remoteness away from settlements.
- Strong influences of weather and season, and contrasting colours of white limestone and red sandstone.
- **Extensive and dramatic views along coastline** from cliff-top path, and associations with artists.



*High Peak, the Picket Rocks and the cliffs along the western side of Sidmouth Bay form the setting to Sidmouth.*



*Coastal oak woodland with fern groundcover growing on slumped cliffs near Lyme Regis*

## What Makes this Landscape Special

Outstanding examples of local geology, including stark white limestone in the east, red sandstone in the west, and pebble beds. Beer Head is the western extent of chalk cliffs in England. Relic and ongoing coastal formations and processes (including landslips) can be observed, along with fossils, and the LCT is within the Jurassic Coast World Heritage Site. The wilderness of the Axmouth-Lyme Regis undercliffs is a National Nature Reserve. Some cliffs are designated SSSI and SAC for their biodiversity and/or geodiversity.

The distinctive colours, shapes and skylines of cliffs form the settings to coastal towns. The dramatic seascapes and strong aesthetic appeal of the cliffs continue to inspire visitors and artists.

Valued for recreation, with the South West Coast Path the only access to some sections, and a strong sense of remoteness, tranquillity and awe.

## Forces for change acting on this LCT

### Past and current forces for change

- Dynamic coastal processes, including landslips, beach movements, coastal erosion etc.
- Wear and tear on popular coastal footpaths.
- Settlement and development in adjoining LCTs (for example caravan parks) affecting views along the coast from within this LCT.
- Spreading of non-native vegetation.

### Future forces for change

- Increased rates of coastal erosion due to effects of climate change, including sea level rise, and increased frequency and intensity of storms.
- Displacement of property and paths away from the edge of cliffs due to coastal erosion, and a resulting need to accommodate them further inland.
- Development may increase pressure for more coastal defences, impacting on natural processes and conservation of assets such as the SSSIs, SACs and WHS.
- Spreading room associated with the England Coast Path will potentially result in land use change along cliff tops.
- Impacts of currently unknown future changes to fisheries policies.

### Landscape Aims

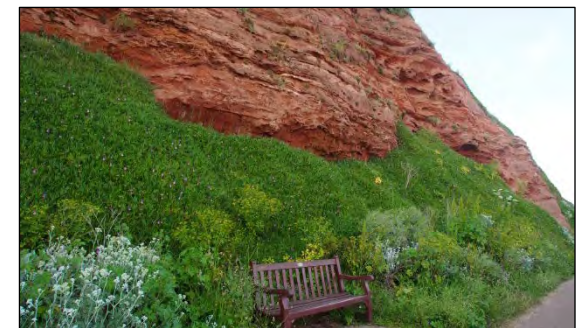
The natural and undeveloped feel of the coast, which is so highly valued, should be retained. This LCT should remain a place where it is possible to experience nature being in control. Where necessary, access to some areas should remain restricted in order for natural processes and habitats to thrive without disturbance. Elsewhere, the South West Coast Path/ England Coast Path should remain an opportunity to experience the coastal environment and appreciate its spectacular views and the associated sense of tranquillity and awe. The Outstanding Universal Value of the Jurassic Coast WHS should be protected, including allowing natural processes of erosion to continue.



*Active coastal processes near Lyme Regis*



*Cliff erosion at High Peak, with rocks of eroded headland out to sea.*



*Non-native Hotentot fig on cliffs at Budleigh Salterton.*



## Landscape Guidelines

### Protect

- The undeveloped and tranquil character of much of the LCT.
- Archaeological sites, or where this is not possible due to ongoing coastal processes, record them.
- The Jurassic Coast World Heritage Site and the coastal processes which underpin its inscription.
- The distinctive settings to coastal settlements.

### Manage

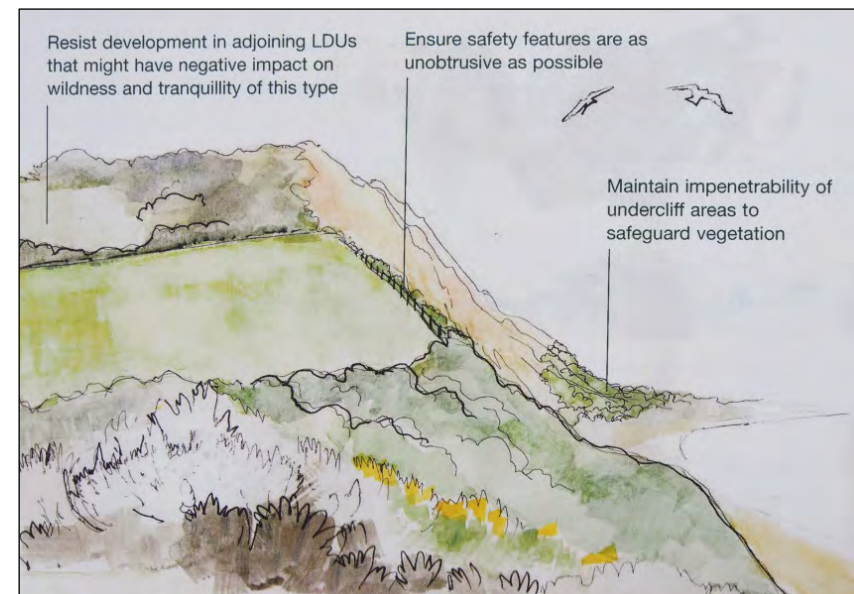
- South West Coast Path/ England Coast Path, ensuring that access and safety features are as unobtrusive as possible to avoid dilution of unspoilt character along cliff tops.
- Semi-natural habitats, including undisturbed undercliff vegetation. Refer to Undercliff National Nature Reserve Management Plan and SSSI Management Plans for detailed management recommendations.
- Manage in accordance with the Jurassic Coast World Heritage Site Management Plan/ Partnership Plan.
- Public Access, restricting access where necessary to avoid disturbance of cliff habitats, as well as for safety reasons.

### Plan

- Maintain the natural qualities of the coastline and resist future coastal development in this LCT or adjacent LCTs (such as caravan site expansion), and enable existing inappropriate development to relocate.
- Where appropriate (for example away from settlements), retain the LCT as a place where nature is in control.
- Educate the public regarding the coast's geology, geomorphology, archaeology and vegetation, but without encouraging inappropriate exploration.
- Refer to relevant Objectives, Policies and Aims in the South Marine Plan



South West Coast Path west of Lyme Regis



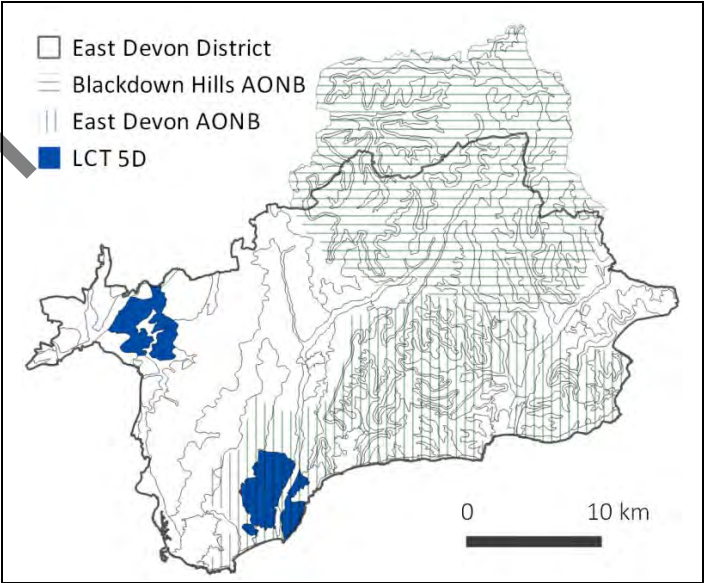


# LCT 5D: Estate Wooded Farmland

Devon Character Areas containing this LCT: Clyst Lowland Farmlands; Pebble Bed Heath and Farmland; Sidmouth and Lyme Bay Coastal Plateau



A typical view within LCT 5D from Killerton Park.  
Clyst Lowland Farmlands Devon Character Area



## Description

This LCT occurs in two blocks in the western part of the Study Area, and comprises the wider landscape setting of the Killerton and Bicton estates. It includes the land which formed the views from the main houses and gardens, and contains designed features such as parkland, obelisks, ornamental tree planting and estate cottages, as well as farmland and woodland. Such designed landscapes in the English Landscape Style contribute to the character of Devon. The Bicton area also encompasses the working elements of the estate, such as the sawmill (now industrial units). Much of the land around the Killerton Estate is owned by the National Trust, and includes the distinctive estate buildings, painted yellow ochre as seen in Broadclyst village. Bicton is the centre of Clinton Devon Estates, and also contributes to the setting of the Jurassic Coast World Heritage Site. The Bicton estate villages of East Budleigh, Otterton and Colaton Raleigh do not have such a strong visual identity as those of Killerton, but are still very attractive, with rows of thatched cottages, and streams running alongside the village streets. The cores of both estates are Registered Historic Parks and Gardens and open to the public.

## Key Characteristics

**Note:** **Bold** text indicates a Devon-wide characteristic. Not bold indicates a local characteristic

- **Rolling hills and ridges drained by frequent streams creating an undulating topography**
- **Well-wooded character, with frequent plantations, estate woodlands, historic woodpasture and conifer blocks.** Also ornamental tree planting.
- **Predominantly pastoral farmland, with areas of arable cultivation. Fields enclosed by wildflower-rich banks and mixed hedges. Some estate railings and walls.**
- **Grassland, ponds and valley mire, and bands of ancient woodland.**
- **Historic parkland, estates and manors influencing landscape character and creating strong sense of place.**
- **Nucleated historic hamlets and villages with square stone church towers forming local landmarks.** A range of materials and building styles, with distinctive yellow ochre estate villages around Killerton.
- **Winding rural roads bounded by Devon banks restricting views, crossing streams on stone bridges.** Network of green lanes around Bicton.
- **Strong sense of peace and tranquillity,** particularly away from the cores of estates. Around Bicton, pines have a sculptural quality against the skyline.
- Key views include those from the main houses and gardens. Some features (e.g. Bicton obelisk and Killerton cottages) are landmarks, whilst others are more subtle.



*Hayes Barton, birthplace of Sir Walter Raleigh, on the Bicton Estate*



*Distinctive yellow ochre cottages associated with the Killerton Estate at Broadclyst*

## What Makes this Landscape Special

Landscapes which form the setting to substantial estates, and which were designed to be seen and enjoyed by the owners. Expansive views contained designed features which may be built (e.g. Bicton Obelisk) or planted (e.g. the sculptural pines on the ridge on the eastern side of the Otter Valley, part of a scheme to accentuate the surrounding horizons when seen from the carriage drive). Bicton Estate also contributes to the setting of the Jurassic Coast World Heritage Site.

A sense of a well-managed and working countryside, implying economic success as well as visual attractiveness.

Estate villages, including the distinctive yellow-ochre cottages seen at Broadclyst, and thatched cottages of East Budleigh and Otterton. Association with Sir Walter Raleigh at Bicton.



## Forces for change acting on this LCT

### Past and current forces for change

- Over-maturity of parkland trees, meaning that they are gradually being lost from the landscape. Sometimes these include rare specimens.
- Loss of wider estate planting (including ridge-top pines and river-cliff planting around Bicton) and a gradual loss of appreciation of historic views and viewpoints.
- Ploughing of parkland which has traditionally been grazed, changing the appearance of the landscape, and also increasing soil erosion by wind and water.
- Decline in traditional woodland management
- Changing farming practices, and loss of traditional farm buildings as they are expensive to maintain but no longer required for their original purposes.
- Adapting estates to accommodate increasing numbers of visitors and associated facilities.

### Future forces for change

- Likely demand for larger farm buildings and other landscape changes to keep farming viable.
- Erosion of distinctive character of settlements and their landscape settings.
- Positive changes from National Trust management at Killerton and Clinton Devon Estates at Bicton, including replanting of mature pines on the river cliff above the Otter, as seen from Budleigh Salterton.
- Tree disease impacting on a range of woodland and parkland trees, potentially reducing shade for recreational activities and routes.
- Impacts of climate change, including flooding, and tree loss from drought, storms and pests.
- Unknown impacts of future changes to agricultural grants and policies.

### Landscape Aims

Historic estates and their settings, including planting schemes associated with the estate landscapes, should be celebrated and enhanced. Visitors should be welcomed and informed, but without visitor infrastructure becoming too dominant and impacting negatively on the character of the landscape or the setting of the Jurassic Coast World Heritage Site. The estate landscapes should retain a working feel, with farms supported, and encouraged to improve biodiversity and habitat resilience. The distinctive character of the estate villages should be retained and enhanced.



*Over-mature / diseased pines within Estate planting*



*Ploughed and intensively farmed former parkland*



*Modern wall using traditional materials and techniques, Colaton Raleigh, near Bicton*



## Landscape Guidelines

### Protect

- Key historic views from properties, gardens, carriage drives and public viewing points such as roads and footpaths.
- Skylines, through resisting development which will appear on horizons, and by managing/ replacing historic planting schemes.
- Estate features such as the Bicton Obelisk, which is both a feature of designed views from the gardens, and a local landmark.
- The very distinctive character of some estate villages.
- The setting of the Jurassic Coast World Heritage Site.

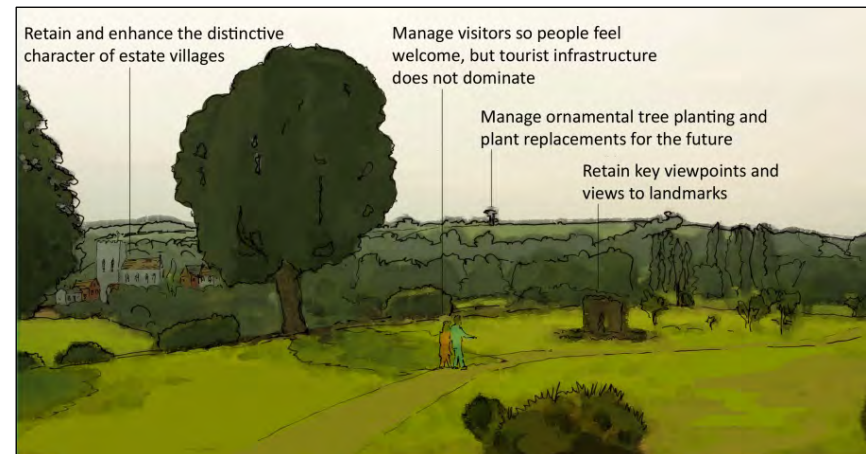
### Manage

- Ornamental tree planting, continuing to plant replacements for the future (e.g. Budleigh Salterton Headland; the planted river cliff alongside the Otter).
- Viewpoints, opening up secondary vegetation where necessary so views can be appreciated.
- Historic parkland, replacing specimen trees to ensure their continued appearance in the landscape. Where parkland has been ploughed and there is no option to return it to pasture, consider planting hedgerows/ hedgebanks to minimise soil loss through erosion and to increase habitat connectivity.
- Woodlands, aiming for age and species diversity, except where use of a particular species was key to the original planting plan. Use traditional techniques such as coppicing where possible.
- Consider replacing lost ash with locally-appropriate alternatives using [best practice guidance](#) to identify suitable species.
- Farmland, including hedgerows/ hedgebanks to maintain landscape structure. Identify opportunities to increase habitat connectivity though linking woodland and grassland areas using field margins.

- Visitors, to minimise damage to paths, archaeological and nature conservation sites, whilst still enabling people to enjoy the landscape
- The estate landscapes in accordance with Management Plans produced by the National Trust / Clinton Devon Estates.

### Plan

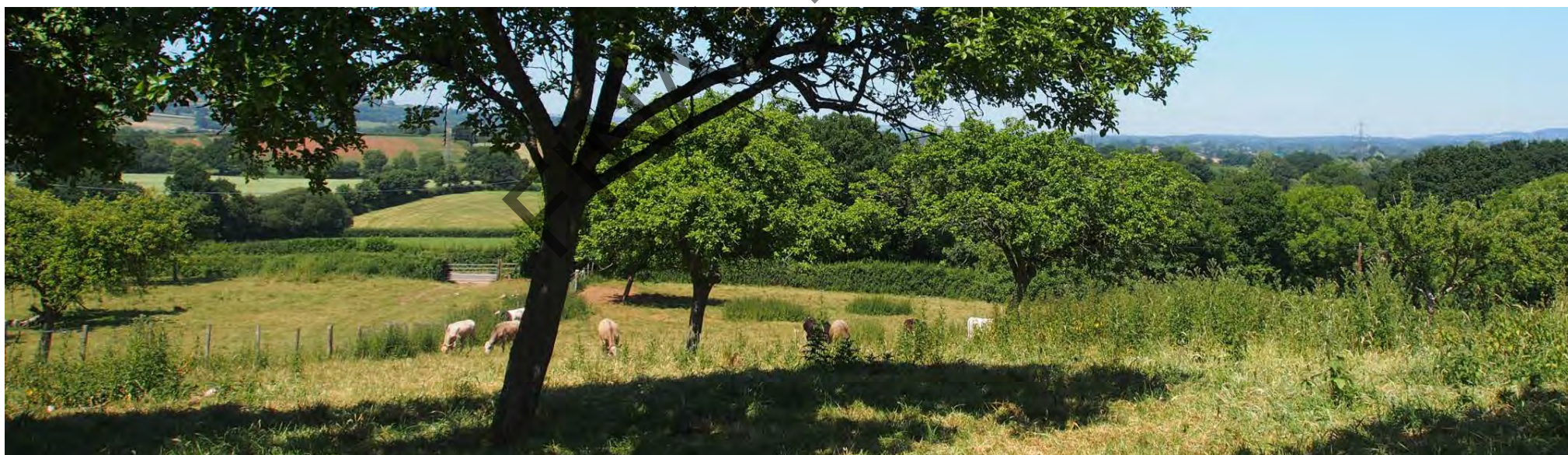
- New buildings should be sympathetic to existing buildings (for example in terms of scale and materials) but not necessarily a pastiche.
- Where new farm buildings are required, they should be very carefully sited and designed to minimise their visual impact on the wider landscape. For example, they should not be sited on ridgelines or prominent slopes, and should use visually-recessive and non-reflective materials.
- Identify opportunities to inform local people and the wider public of the history and importance of the estate landscapes, and to explain why trees and other features were located in particular places.
- Ensure that visitor infrastructure remains subordinate to the wider landscapes of the estates.
- Ameliorate impacts of future tree loss, including on recreation sites/routes.







*The Corry Brook Valley from Danes Hill, Blackdown Hills DCA; Wooded Ridges and Hilltops LCT*



*Traditional orchard near Whimble, Clyst Lowland Farmlands DCA; Lowland Plains LCT*



## Appendices

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## Appendix A: List of acronyms and glossary of technical terms

AONB Area of Outstanding Natural Beauty

DCA Devon Character Area

EDDC East Devon District Council

GI Green Infrastructure

GIS Geographic Information System

HER Historic Environment Record

LCA Landscape Character Area

LCT Landscape Character Type

MCZ Marine Conservation Zone

MMO Marine Management Organisation

NCA National Character Area

NFM Natural Flood Management

NNR National Nature Reserve

SSSI Site of Special Scientific Interest

SAC Special Area of Conservation

SANG Suitable Alternative Natural Greenspace

SPA Special Protection Area

SWCP South West Coast Path

WHS World Heritage Site

**Ancient tree** A tree which, because of its great age, size or condition is of exceptional value for wildlife, in the landscape, or culturally.

**Alluvium** Material deposited by a river

**Ancient woodland** An area that has been wooded continuously since at least 1600AD.

**Ash die-back** Disease affecting ash trees (also called Chalara) caused by the fungus *Hymenoscyphus fraxineus*

**Barrow** A mound of earth or stones, usually covering a burial or burials.

**Biodiversity** The variety of life, including all habitats and species

**Bronze Age** Archaeological period c. 2,000-700BC

**Cairn** An artificial pile of stones

**Combe** A short valley or hollow on a hill or coastline, often dry valleys in a limestone area

**Coping stones** The stones which form the top of a wall

**Coppice/coppicing** Method of managing woodland in which trees are cut every 10-15 years for small diameter wood

**Curtilage** The area of land surrounding a building, such as a garden. Not all buildings have a curtilage.

**Devonian** Geological period c. 359-419 million years ago. The Devonian rocks found within the study area date from c.407-345 million years ago.

**Dispersed (settlement)** A scattered settlement pattern with buildings spread out without a clear centre

**Ecological corridor** An area of vegetated land linking other areas of biodiversity interest, encouraging the spread of plant, animal and insect species.

**Estuary** The broad mouth of a river that flows into the sea, where fresh water mixes with tidal sea water

**Exotic trees** Species of trees which are not native to the UK, and which have been introduced from other parts of the world, often as part of ornamental planting schemes within gardens and estates

**Field pattern** The distinctive pattern created within the landscape by the size and shape of contiguous fields. The relationship between size and shape is often strongly related to the age of the pattern itself. Irregular, smaller fields are generally older than larger, more regular field patterns

**Green Infrastructure** A network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

**Habitat** The place where a particular species lives and grows. It is essentially the physical environment which surrounds and is utilized by a species population

**Heathland** Usually open habitats characterised by dwarf shrubs (e.g. heather) and certain tree species. Associated with unimproved areas underlain by infertile acid soils

**Hedgebanks** A field boundary feature distinctive to South-West England, comprising an earth bank topped with a hedgerow. The bank may be faced with stone or turf

**Hedge Laying** Method of managing and maintaining hedgerows by removing some trees, retaining others and a proportion of appropriate branches being part cut and laid tight into the hedgebank or ground

**Incised** Steeply and deeply cut

**Indigenous** Plants or animals belonging naturally to or occurring naturally in a particular area.

**Iron Age** Archaeological period c.400BC-43AD

**Jurassic** Geological period c.200-145 million years ago

**Land Cover** Combinations of natural and man-made elements including vegetation which cover the land surface

**Landscape Character Area (LCA)** A single unique area which is the discrete geographical area of a particular landscape type. Each has its own individual character and identity

**Landscape Character Type (LCT)** Distinct types of landscape that are relatively homogenous in character. Wherever they occur they share broadly similar combinations of geology, topography, drainage patterns, historical land use, and settlement pattern

**Lime kiln** Site where limestone was burnt to provide lime for fertiliser, builders' mortar etc.

**Linear development** A settlement pattern which follows a line, such as a road or river bank

**Linhay** A shed or other farm building open in front, typically with a lean-to roof. The term is particularly common in South-west England

**Natural Assets** The elements of nature that produce value and benefits (directly and indirectly) to people

**Nucleated settlement** Settlement with a distinct core with buildings closely grouped together

**Pale** Earthwork marking the boundary of a medieval deer park

***Phytophthora ramorum*** Destructive parasitic fungi causing brown rot in plants

**Pillbox** A small military defensive guard post, usually constructed of concrete, but occasionally of locally-available materials, with openings through which weapons can be fired

**Planned** Refers to a more recently enclosed area of land, that is often characterised by regularity in field shape, straight roads, and is large in scale

**Plateau** An extensive area of relatively flat high land, usually bounded by steep sides

**Riparian** Of, or on, a riverbank

**Salinization** The processes of increased quantity of salt in the soil or groundwater, affecting the species which can grow

**Salt marsh** A coastal wetland that are flooded and drained by salt water brought in with the tides. It is dominated by salt-tolerant plants which help to trap and bind sediments. Salt marshes are important feeding grounds for waders and other bird species

**Semi-natural habitat** Vegetation which has been modified by humans that is still of significant nature conservation interest

**Spring-line mires** Areas of wet ground associated with watercourses, upwelling at geological boundaries

**Time-depth** Ability to see a range of historic features which have been created over many years

**Turbaries** Areas of land that has been formerly designated as common land where peat may be dug up for use as fuel

**Undercliff** A terrace formed above beach level from material that has fallen from a cliff

**Unimproved grassland** Grassland which has not been treated with fertilizer, lime or artificial drainage to improve yields

**Vernacular** Architecture concerned with domestic and functional rather than public or monumental buildings. It generally utilizes locally-available materials and techniques to create buildings with a distinctive local character

**Veteran (tree)** A term describing a tree that has habitat features such as wounds or decay

**Wildlife Corridor** Areas of habitat connecting wildlife populations



## Appendix B: Changes to Landscape Character Types (LCTs) made since last published (2008)

The Landscape Character Types map on page 15 of this document contains a small number of changes when compared to the equivalent map in the 2008 *Landscape Character Assessment and Management Guidelines*. These changes are set out in the table below, along with an explanation of why they were made. Some of the LCT numbers and/or titles are also different, reflecting changes in the 'Devon Menu' of LCTs made in the intervening years. Some changes were made in 2017 to ensure that the LCA evidence informing the Greater Exeter Strategic Plan is fit for purpose, up to date and consistent across administrative boundaries.

Location	Change made	Reason for change
Exe tributary valleys to the west of Cowley	Changed from LCT 1E ( <i>Wooded Ridges and Hilltops</i> ) to LCTs 3G ( <i>River Valley Slopes and Combes</i> ) and 3H ( <i>Secluded Valleys</i> ) Change made in 2017, verified in 2018.	The new LCTs have been added to the 'Devon Menu' of LCTs since 2008.
Around Killerton Estate, including Ashclyst Forest	Changed from LCT 1E ( <i>Wooded Ridges and Hilltops</i> ) to LCT 1D ( <i>Estate Wooded Ridges and Hilltops</i> ). Change made in 2017, verified in 2018.	The new LCT has been added to the 'Devon Menu' of LCTs since 2008.
South of Killerton, including Broadclyst	Changed from LCT 3B ( <i>Lower Rolling Farmed and Settled Slopes</i> ) to LCT 1D ( <i>Estate Wooded Farmland</i> ). Change made in 2017, verified in 2018.	The new LCT has been added to the 'Devon Menu' of LCTs since 2008.
Around Bicton Estate	Changed from LCT 1B ( <i>Open Coastal Plateau</i> ) and LCT 3B ( <i>Lower Rolling Farmed and Settled Slopes</i> ) to LCT 1D ( <i>Estate Wooded Farmland</i> ).	This area reflects the characteristics of LCT 5D, which has been added to the 'Devon Menu' of LCTs since 2008.
Coast between Otterton and Sidmouth	Changed from LCT 1B ( <i>Open Coastal Plateau</i> ) to LCT 4H ( <i>Cliffs</i> ).	Improves accuracy of mapping along coastal margin.
Otter Estuary	<i>Unsettled Farmed Valley Floors</i> changed to LCT 4B <i>Marine Levels and Coastal Plains</i> . LCT 4B ( <i>Marine Levels and Coastal Plains</i> ) changed to LCT 4A ( <i>Estuaries</i> ).	Aligns LCT with the Otter Estuary Recommended Marine Conservation Zone (Defra, June 2018).
Axe Estuary	Changed from LCT 4B ( <i>Marine Levels and Coastal Plains</i> ) to LCT 4A ( <i>Estuaries</i> ).	Aligns LCT with the Axe Estuary Recommended Marine Conservation Zone (Defra, June 2018).
Around Sidbury	Changed from <i>Unsettled Farmed Valley Floors</i> to LCT 3B ( <i>Lower Rolling Farmed and Settled Valley Slopes</i> ) and a small urban area.	The area better reflects the characteristics of the new LCT, and the change improves consistency with similar valleys elsewhere.
Side slopes of Mutters Moor, West of Sidmouth	Changed from <i>Coastal Slopes and Combes</i> LCT to LCT 2A ( <i>Steep Wooded Scarp Slopes</i> ).	The area better reflects the characteristics of the new LCT, and the change improves consistency with similar hills elsewhere
South side and southern tributary valleys of Coly Valley, around Southleigh	Changed from LCT 3B ( <i>Lower Rolling Farmed and Settled Valley Slopes</i> ) and LCT 1E ( <i>Wooded Ridges and Hilltops</i> ) to LCT 3A ( <i>Upper Farmed and Wooded Valley Slopes</i> ).	The area better reflects the characteristics of the new LCT, and the change improves consistency with similar valleys elsewhere.
East of Axminster	LCT 2A ( <i>Steep Wooded Scarp Slopes</i> ) changed to LCT 3C ( <i>Sparsely Settled Farmed Valley Floors</i> ). LCT 3B ( <i>Lower Rolling Farmed and Settled Valley Slopes</i> ) changed to LCT 2A ( <i>Steep Wooded Scarp Slopes</i> ).	Corrected labelling mistake in previous version of the map. No LCT boundaries were changed, but the sequence of LCTs up the valley side is now correct.
Coast to west of Lyme Regis	Four small coastal combes changed from <i>Cliffs</i> LCT to LCT 4D ( <i>Coastal Combes</i> ).	The areas better reflect the characteristics of the new LCT, and the changes improve consistency with similar coastal combes elsewhere



FINAL DRAFT



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

**Date of Meeting:** 26 March 2019

**Public Document:** Yes

**Exemption:** None

**Review date for release** No document review is planned.

**Agenda item:** 9

**Subject:** **Action plan for production of a revised East Devon Playing Pitch Strategy.**

**Purpose of report:** This report advises of a proposed timetable and work programme for a revised East Devon Playing Pitch Strategy.

**Recommendation:** **Members are asked to agree the production of a revised East Devon Playing Pitch Strategy in consultation with Sport England and other sporting bodies and clubs to aid future funding bids to support the delivery of new and improved sports facilities in the district and negotiations with developers over provision as part of major developments.**

**Reason for recommendation:** To gain formal approval for production of a revised East Devon Playing Pitch Strategy.

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

**Financial implications:** The expectation is that a light touch approach will be taken with production of the PPS and that work will be undertaken 'in-house'. However, section 7 of the report highlights circumstances in which it may become necessary to buy-in external help: refer to section 7 for more details.

**Legal implications:** There are no legal implications at this stage other than as set out in the report.

**Equalities impact:** Low Impact

**Risk:** Low Risk

There is a low risk identified and associated with securing approval for this document.

**Links to background information:**

- Links are provided in the body of the report.

**Link to Council Plan:** The revised East Devon Playing Pitch Strategy has direct links with – "Encouraging Communities to be Outstanding".



## 1 Introduction

- 1.1 Members will recall that an East Devon Playing Pitch Strategy (PPS) was approved by this Council in June 2015. This strategy was produced in accordance with Sport England (a non-departmental public body under the Department for Digital, Culture, Media and Sport) best practice and [guidance](#) for PPS production and the East Devon strategy has been held up as a model document. However, PPSs have a limited shelf life (a revision is recommended after three years) and a refresh is now appropriate (indeed overdue). The approved PPS from 2015 can be viewed via this web link:  
<http://eastdevon.gov.uk/media/1182367/adopted-east-devon-pps-2015.pdf>
- 1.2 The existing East Devon PPS establishes the need for sports pitches across the District and it also examines the actual supply and availability of pitches to meet this need. From this demand and supply assessment the PPS identifies where and for what sports there are shortfalls in pitch provision, or potentially where supply meets need or perhaps exceptionally there could be more pitches than are needed. In undertaking this assessment the PPS looks at the scope to improve existing facilities and therefore the potential to address shortfall issues through, for example, more matches being played on the same pitch/es. The PPS also looks at the potential for future sports pitch provision.
- 1.3 The 2015 PPS was specifically concerned with need and supply of pitches for:
- Football;
  - Rugby Union;
  - Cricket; and
  - Hockey
- and was produced through close collaborative work with governing bodies for these sports as well as local clubs, Sport England and other parties. In any refresh the work will look again at these sports noting that other outdoor sports are typically comparatively minor in terms of activity rates and indoor sports and facilities fall outside of the remit of the assessment process. However, if in the course of undertaking the assessment information comes to light around other sports use and demand then it may be relevant to broaden the assessment work or undertake ancillary sports pitch planning work. For example American Football and Baseball are both sports that have seen increased levels of participation in recent years and discussions with governing bodies for these sports would be appropriate.
- 1.4 The PPS covers all pitches across East Devon. This includes both natural grass and Artificial Grass Pitches (AGPs), pitches owned by the council, privately owned pitches, pitches on educational sites, pitches in their own right, and pitches provided as part of a recreation ground. Community access (as opposed to being restricted to a professional/semi-professional club or organisation that does not provide such access), is a key issue. The PPS is concerned with need generated from the East Devon population and it also takes into account clubs that may have a home base that lies outside of East Devon but

that play (home) matches in the District as well as East Devon based teams that play (home) matches outside of the District.

## **2 Key Findings of the 2015 Playing Pitch Strategy**

2.1 The 2015 PPS showed a general pattern of under-provision of sports pitches across East Devon with a number of pitches in poor condition and therefore not able to support optimum levels of use. There were particular challenges identified in Exmouth and Honiton and for this reason more detailed assessments were undertaken for these towns that specifically looked in some detail at options for enhancing existing pitches and promoted new sports pitch provision. Specific addendum Sports Pitch Strategies were subsequently worked on for [Honiton](#) (adopted) and [Exmouth](#) (draft).

2.2 The 2015 PPS contained the following summary of key general issues:

- Provision of youth and mini football and rugby pitches is particularly poor.
- Management and maintenance of many grounds is poor due to lack of funds.
- There is a distinct lack of access to all-weather floodlit training facilities throughout the district and need for at least 2 full-size third generation – artificial grass pitches.
- There are a number of Exeter based clubs that play in East Devon.
- In general, in addition to existing stock, there is a district-wide need for:
  - 4 new adult football pitches;
  - 6 youth 11 a side football pitches;
  - 4 pitches for 9 aside football; and
  - 6 mini soccer pitches.
- As a conservative estimate there is a district-wide need for two to three cricket grounds in East Devon.
- Given aspirations and current supply, shortage of good quality grass pitches will restrict rugby development.

## **3 Use that has been made of the existing Playing Pitch Strategy**

3.1 The current PPS has been used and has helped in the following instances:

- Securing grant aid funding for refurbishment of The Kings School Artificial Grass Pitch at Ottery St Mary;
- Negotiating and subsequently requiring/allocating sports pitch hubs at Cranbrook through the Cranbrook Plan DPD;
- Securing additional improvements to extant permitted sports pitches at Cranbrook;
- Protecting existing sports pitches from loss to other uses such as at Winslade Park;

- Protecting and improving the proposed provision of sports pitches at the former Rolle College playing fields in Exmouth.

3.2 There have, however, been proposed or potential projects and initiatives set out in the 2015 PPS that have not made any real progress. Whilst the PPS sets out a strategy and options to support sports pitch provision it is not an implementation plan, it does not in its own right come with funding behind it and does not commit any party (whether this council or anyone else) to take any direct or specific action or to spend money or make investments. In this respect and with limitations on public, voluntary and charitable sector funding (and provision of sports pitches typically not being a money making opportunity for the private sector) there has been some frustration over lack of delivery of some of the suggestions, proposals and aspirations of the current PPS.

3.3 When it comes to securing new pitch provision one of the most effective means to use the PPS and actually see new pitch provision, is in association with larger scale (specifically including housing) development proposals. On sites where larger scale housing development is planned the development, in its own right, will generate a need for new sports pitches and in such development schemes it should be expected that sports pitch provision will be on site. Whilst developer contributions will only be appropriate (or at least can only be legitimately required) to meet the needs generated from the development itself there can be the potential to secure additional funding from elsewhere in order to secure additional and better facilities that can help support a wider need.

## **4 Proposals for a Playing Pitch Strategy refresh**

4.1 Despite limitations on being able to deliver some of the aspirations of the past PPS, though also some notable successes, a PPS refresh is now appropriate. Of critical importance is the fact that Sport England and other funding bodies can be expected to place considerable weight on the existence of a PPS when making funding and investment choices and grant aiding schemes. Funding decisions will typically be based on and need to be backed up by evidence that improvements to facilities or extra facilities are appropriate or required. An up to date PPS is the definitive means and mechanism to identify and demonstrate the case for improvements and investment to be made and in the absence of a PPS it may be very difficult to prove need and therefore to secure such investment.

4.2 There was a considerable amount of time and effort involved by staff in the Planning Policy section of the Council, with some inputs from other departments and also outside partners, into production of the original PPS. Major time consuming tasks involved primary data and information collection along with on-site assessment of all playing pitches identified in the District. 'Behind the scenes' there was also a lot of detailed statistical assessment of the data and information gathered in order to generate robust outputs on need and demand for pitch provision. This body of evidence was then translated into recommended actions and the actual strategy. In order to produce the first strategy it was necessary to employ consultants in order to undertake some of the site assessment work and evaluate new site provision options as well as to undertake some of the statistical assessment and evaluation.



- 4.3 The good news is that for a refresh of the strategy much of the previous work undertaken can be reviewed and revisited and established contacts efficiently contacted to assist with any updating. In many cases the primary information such as numbers of teams that are playing sports and the presence, accessibility and quality of pitches is unlikely to have changed (anecdotal evidence would indicate this to be the case). Therefore whilst there will be a need to review past and current circumstances, the hope is, subject to sport governing body endorsement and that of Sport England, that the assessment work will major on the assumed comparatively limited number of circumstances where changes have occurred.
- 4.4 It is advised that early discussions have taken place with Sport England and they, and the governing bodies of the sports, are happy, in-principle, with the proposed light-touch review of the PPS. A caveat must be made, however, around any assumption that significant changes have not occurred. If new assessment shows that there have been fundamental or significant changes then a light touch review may not be possible and a more in-depth assessment, more akin to wholesale brand new strategy production, may be needed.

## 5 Methodology and timing for the Playing Pitch Strategy refresh

- 5.1 Whilst it is stressed that the expectation is for a light touch review of the existing strategy it is, nonetheless, appropriate for this review to be undertaken in alignment with and to follow the steps set out in the Sport England guidance for PPS production.
- 5.2 The Sport England guidance on PPS production includes 5 stages broken down into 10 individual steps. These are shown in the table below (first column) alongside succinct commentary on how we propose to undertake them (second column) and envisage timing for the work (third column). With work starting in March 2019 (in reality it actually started before this time, for example a preliminary meeting was held with Sport England and governing bodies in summer 2018) it is envisaged that a final PPS should be completed and ready for formal approval by the Council in late 2019.

PPS - Stages and Steps	Proposed work plan for East Devon District Council Planning Policy team	Timing
<b>STAGE A – Prepare and tailor the approach</b>		
1. Prepare and tailor the approach	We will need to clearly set out reasons and logic for producing the PPS – specifically what we want to achieve and why. Whilst the Planning Policy team, as last time round, will lead on and undertaken the vast bulk of the work, we will also need to identify scope to work with other partners inside and outside of the Council (we have already approached Sport governing bodies). An expectation is that the overall approach and more importantly logic to work on PPS production will not differ significantly (if really at all) to that taken last time round, though it can be expected to be more streamlined.	This will form early scoping work that can be expected to be completed in March 2019 though it will need to be revisited as the PPS work progresses.
<b>STAGE B – Gather information and views on the supply of and demand for provision</b>		

PPS - Stages and Steps	Proposed work plan for East Devon District Council Planning Policy team	Timing
2. Gather supply information	This is the stage of work where we will revisit past sports pitch assessment to establish if and whether circumstances have changed (got better or worse). We will, however, need to specifically identify and assess any new pitches that have come into existence and also record any losses of pitches or factors such as where the quality or usage of a pitch may have changed.	This work is likely to run through March and May 2019 though seasonal use considerations may impact on this (particularly for cricket)
3. Gather demand information	<p>This stage of work is concerned with understanding the clubs in existence and the number of teams that they support. We will contact governing bodies and clubs to review past records noting any changes that may have occurred and this work will also need to look at ancillary facilities (such as changing rooms). This work will, however, also need to take into account:</p> <ul style="list-style-type: none"> <li>• Any new clubs that have formed and the teams they support;</li> <li>• Any clubs that have ceased to exist;</li> <li>• The latent demand for clubs that may exist (for example the issue that there may be more teams and players if only the pitches existed) or more generally trends in participation; and</li> <li>• Any additional demand or changes that may be expected to occur because of the changing nature or ages of the population and especially as may arise as a consequence of new development (specifically new concentrations of people living in new homes).</li> </ul>	This work is likely to run March to May 2019, though past experience suggests that it can be challenging to get all club responses back in a timely manner. That being the case timing overruns may occur (and/or it may be necessary to make informed assumptions in the absence of third party data supply or the verification of existing data).
<b>STAGE C – Assess the supply and demand information and views</b>		
4. Understand the situation at individual sites	This stage of work melds together information from steps 2 and 3 to build up a picture of how and when and by who existing pitches are being used and whether, on a pitch by pitch basis they are being appropriately utilised. The quality of a pitch, (for example how good the drainage is), can have very significant impacts on the numbers of matches that can be played on it. In contrast artificial grass pitches can be in just about constant use, subject to any limited required maintenance, floodlighting and operational use restrictions. It should be noted that school use of pitches and pitches at schools can complicate assessment on account of potentially taking pitch use out of wider community availability and/or making a school facility available for community use outside of school needs or provision. Use for training as opposed to match use also adds a further degree of complication.	This task requires significant statistical assessment work and would be expected to run alongside parts of the previous steps and on through the summer months – June or July 2019.

PPS - Stages and Steps	Proposed work plan for East Devon District Council Planning Policy team	Timing
5. Develop the current and future picture of provision	Having established a base position in step 4, step 5 will help develop a more complete picture of shortfalls (or potential over-provision) of pitches and use of pitches overall but especially on a geographical need and demand basis (including, for example, whether a club based in a town is playing in that town or needs to travel elsewhere to play). The work will assess site availability for differing sports and for differing clubs and their teams in differing locations. It will, however, also need to project forward into the future to look at pitch availability and use now and look at trends and expectations for the future to judge the degree or extent to which circumstances and pitch availability will suit and match-up to where we may be at future times.	From previous assessment and further analysis this stage should be undertaken alongside step 4 and into July/August 2019.
6. Identify the key findings and issues	Step 6 summarises and reviews the working through Steps 1 to 5. We will have a good understanding of the key findings and issues with pitch provision and the adequacy of provision to meet both current and future demand.	This task should be completed in July/August 2019.
<b>STAGE D – Develop the strategy</b>		
7. Develop the recommendations and action plan	This stage of work is concerned with taking the technical work from steps 2-6, drawing it all together and turning it into a plan of action – what do we want to do and where do we want to do it. This is expected to include a number of ‘what if’ scenario testing exercises that subsequently lead to specific recommendations and actions for specific sites and sports. An output from this work (as included in the 2015 PPS) can be expected to be outcomes around: <ul style="list-style-type: none"> <li>• <b>Protect</b> – guidance and recommendations on protect the use of pitches that already exists (unless demonstrably over-supply is identified).</li> <li>• <b>Enhance</b> – making better and best use of existing facilities and pitches; and</li> <li>• <b>Provide</b> – identify potential opportunities to provide new pitches.</li> </ul>	This task should be completed in August 2019.
8. Write and adopt the strategy	This stage involves formally writing, consulting on (if appropriate) and adopting the strategy.	Projected to have a draft strategy for consultation in September and a final strategy for adoption in December 2019.
<b>STAGE E – Deliver the strategy and keep it robust and up to date</b>		



PPS - Stages and Steps	Proposed work plan for East Devon District Council Planning Policy team	Timing
9. Apply and deliver the strategy	<p>The PPS should be regarded as the key document within the study area guiding the improvement and protection of playing pitch provision. It needs to be the document people regularly turn to for information on how the current demand is met and what actions are required to improve the situation and meet future demand.</p> <p>The Sport England guidance highlights potential uses to include in respect of:</p> <ul style="list-style-type: none"> <li>• <b>Sports Development Planning</b> - helping with planning with and for sports facility provision;</li> <li>• <b>Planning Policy</b> – informing and assisting with preparing future policy options and choices;</li> <li>• <b>Planning Applications</b> – including supporting applications and resisting inappropriate loss of pitches;</li> <li>• <b>Community Infrastructure Levy</b> – including assisting with making funding decisions;</li> <li>• <b>Funding Bids</b> – providing evidence to inform and justify bids;</li> <li>• <b>Facility and Asset Management</b> – informing management decision in respect of facilities;</li> <li>• <b>Public Health</b> - informing public health actions and decisions;</li> <li>• <b>Co-ordinating Resources and Investment</b> – helping to plan and manage investment decisions;</li> <li>• <b>Capital Programmes</b> - Provide evidence to justify protection and investment and inform programmes of works; and</li> <li>• <b>Monitoring delivery</b> – the recommendations and actions of and in the PPS should be monitored.</li> </ul>	This is ongoing work after the PPS has been approved.
10. Keep the strategy robust and up to date	<p>There should, ideally, be an annual review of the strategy which the Sport England guidance advises “<i>should not be regarded as a particularly resource intensive task</i>”. Full data review (like this proposed review) should be undertaken every three years.</p>	Annual review is recommended

## 6. A Steering Group for Playing Pitch Strategy Production

- 6.1 The Sport England guidance stresses the importance of joint working on production of the PPS. For the 2015 PPS the work was predominantly lead and undertaken by an officer in the planning Policy team. There was, however, a multi-disciplinary officer working group drawn from different parts of the Council that were of particular value in respect of Stage B and Stage D.
- 6.2 There was also, and has remained over the years, a steering group led by Planning Policy staff that draws together Sport England, Active Devon and representatives of sport

governing bodies to coordinate information collection and sharing, and collaboratively discuss and agree the strategy inputs, outputs and action plans. Agreement and sign off through such a working party is seen as essential in order to demonstrate wide ranging buy-in and robustness to and of the PPS.

## **7 Possible need for employment of consultants**

- 7.1 It is hoped that it will not be necessary to employ consultants to help with production of the PPS review. However if significant and technically complex matters arise, resources (specifically staff time) are not available or stretched or other concerns arise then it may be seen as necessarily or relevant to buy-in external help to assist with the work. This is, however not the favoured outcome and, in-principle, it is seen as far more desirable to undertake work 'in-house' and develop skills and systems to undertake all relevant tasks. In the event that consultancy support is needed to complete the work then it is envisaged that this would be paid for from existing budgets.
- 7.2 Notwithstanding the desirability of doing all the work 'in-house' there are two areas or aspects of the work, highlighted at this stage, which may require buying-in external help in relation to Stage C and steps 4, 5 and 6 of the methodology;
- a) **Data analysis** – at various points in preparing the PPS, perhaps most significantly at Step 5, there is a lot of data assessment and analysis. This assessment work could prove to be quite complex and we may see the need to buy-in external help to assist with this element of the work.
  - b) **Detailed assessment of current and future pitch potential** – the 2015 PPS and the follow on Exmouth and Honiton studies involved some detailed survey and assessment work of existing (including previously used) pitches and examination of land with potential for future use. This work involved buying-in specialist external consultancy support to undertake and assess topographic issues (the slopes and changes off in level of land) and therefore any earth moving requirements, the makeup of soils and hence suitability for sports pitch use, potential drainage issues and other allied tasks. If for or as a product of production of this PPS there is a need or desire to look in detail at sports pitches then there may be a need to buy-in such specialist advise again. Work of this nature, beyond a superficial level, is certainly not work that the Planning Policy team are qualified to undertake and it is not known if other teams at the Council have the skills sets or available time to undertake such work. Having said all this the expectation is that it is unlikely that we will need further assessment work, but this will not become clear until after initial stages of evaluation are undertaken.

## **8 Potential for joint working with other local authorities**

- 8.1 There is potential for joint working on the PPS. Working with or in parallel with other local authorities there would be potential to produce separate but aligned PPSs. The adopted PPS is based on a needs assessment that was carried out jointly with Exeter City Council,

and there is an opportunity to potentially produce another joint needs assessment to ensure PPSs adequately consider and address cross-boundary issues.

- 8.2 Joint working can have attractions and under many circumstances can be desirable. Local authority boundaries often mean little to people going about their everyday lives and where they live, work, shop, visit services and in respect to sports and playing fields where they play. The 2015 PPS showed that a number of Exeter based sports clubs play their home games in East Devon and some East Devon based/originating clubs, notably playing hockey, travel to Exeter to play. Of course league structures, and distribution of teams within them, may also pay little or no regard to local authority boundaries. Joint working has potential to be more in tune with realities of how many people live their lives and play. It also may offer opportunities to save money and develop shared skills and otherwise coordinate effort and deliver collective solutions.
- 8.3 Joint working does, however, require shared agenda's and commitments, it does rely on running to agreed and potentially parallel time scales (maybe running to the timescale of the slowest partner) and does potentially require doing things in the same way with lesser scope for differing authorities to choose specifically what they feel may best meet their objectives or aspirations.
- 8.4 Officer level discussions with neighbouring authorities (particularly across the Greater Exeter Strategic Plan area) have identified the opportunity to work together with Exeter City Council once more. In time, should external consultancy support be required, then this could present an opportunity for cost sharing. It is understood that Mid Devon and Teignbridge district councils are not currently in a position to review their PPSs, though clearly there will be a need to keep this situation under review as the Greater Exeter Strategic Plan (GESp) progresses. At this stage, although potential is noted, joint working is not proposed.

## **9 Delivery of the Playing Pitch Strategy**

- 9.1 It is highlighted that production of a playing pitch strategy could be reasonably undertaken over 2019 and that such a strategy would be expected to include a number of recommendations. In some case, such as resisting losses of playing pitches if planning applications propose development on them, the PPS can have immediate and obvious application. But where new facilities may be recommended through the strategy delivery can be far more challenging. The Council does not have a specific team or staff dedicated to playing pitch delivery and new facilities can be very expensive to provide and time consuming for staff.
- 9.2 In some quarters it might be read or inferred that because the District Council has produced the strategy (with the Council logo on the front cover) it will or should be the Council that will provide facilities and make them available, as well as potentially managing and maintaining them. Whilst the District Council do provide some pitches, and for example have scope to spend section 106 monies and perhaps other council funds, direct provision is increasingly rare and challenging.



- 9.3 It does, therefore, need to be stressed with communities and sporting clubs that taking the lead on new facilities provision will often need to fall to them with the District Council typically taking a supporting rather than lead role.

## **10 The Option of not having an up to date Playing Pitch Strategy**

- 10.1 It is highlighted, that there is no absolute obligation on the council to have a PPS, though the National Planning Policy Framework, at paragraph 96, stresses the importance of understanding need and opportunities for provision, it effectively steers councils towards having a PPS.
- 10.2 Many council's in England do not, however, have an up to date PPS and some may regard production, in a world of diminishing resources to be a luxury that can't or would choose not to afford. Perhaps in some cases it may be considered that the possible benefits that a PPS may deliver are unlikely to materialise anyway or if they did they could generate liabilities (as well as benefits it must be hoped) that Councils are not able or may choose not to afford.
- 10.3 Furthermore having a strategy for playing pitches (or indeed a strategy for or on anything) implies that you are setting out a process or thinking on actions you will take in the future. Having a strategy, that to some degree is a pre-determinant on actions you would presumably then wish to follow, may be seen to reduce the ability to be flexible and nimble in approach when responding to opportunities and unknowns that may arise at any given time and in a way that suits at that time. There may also be a reputational issue for the Council, any Council, in having a PPS that may identify and recommend courses of action (e.g. potential for new sports pitches) if the Council has no real means or resources to deliver them and there are no alternative options or means to secure delivery.
- 10.4 Set again the possible benefits that may be argued for not having a strategy must be the positives that are highlighted in this report. It is also noted that there may be other formats and processes that differ from the Sport England approach to strategy production that may exist. These are not however known to officers and it would seem odd, given that Sport England are a statutory body in respect of sporting matters, and otherwise grant aid pitch provision and improvement, to not follow the approach they advocate.
- 10.5 There would also be options to delay PPS production and in terms of supporting planning policy production there may actually be some arguments to undertake the PPS work to dates and deadlines geared around supporting Greater Exeter Strategic Plan and new East Devon Local Plan production and/or implementation. However any delay (and the longer the worse) would diminish the credibility of undertaking a light-touch review and instead place the onus on producing a full scale review. A full scale review could actually be more complex and time consuming in the long run and would increasingly lead to a time where we lack an up to date PPS and therefore have a weaker position when it comes to dealing with some matters that a PPS may support, specifically including supporting bids for funding.

- 10.6 At this stage it is not formally proposed but there could also be potential to look at combining a new PPS with a much larger piece of work assessing built and indoor sports facilities. This would, however, be more complex and time consuming and more likely to require buying-in external consultancy advice.



**Report to:** Strategic Planning Committee

**Date of Meeting:** 26<sup>th</sup> March 2019

**Public Document:** Yes

**Exemption:** None

**Review date for release** None

**Agenda item:** 10

**Subject:** Custom and self-build housing

**Purpose of report:** To report on the level of interest in self-build in East Devon as demonstrated through the self and custom build register and to consider ways to encourage more custom and self-build in East Devon as informed by work undertaken in association with the Governments 'Right to Build Taskforce'.

**Recommendation:**

1. To note that there were a total of 93 individuals registered on the self-build register at the end of the monitoring period (30<sup>th</sup> October 2018) and the need to take this into account when undertaking the Council's planning, housing, regeneration and disposal of land functions;
2. To note the need to permission 9 suitable plots in addition to those already consented to meet the demand shown on the self-build register during the next three years (by 31<sup>st</sup> October 2021).
3. That a Member task and finish forum consisting of the relevant planning and housing portfolio holders and member leads, vice-chair of Strategic Planning Committee and chair and vice-chair of Development Management Committee be established with appropriate officer support. The group to consider how the Council could take a more pro-active approach to the delivery of custom and self-build housing plots considering experience from elsewhere and potential actions such as those listed in paragraph 4.4. The group to then make recommendations to a future meeting of Strategic Planning Committee for them to agree/recommend actions as appropriate.

**Reason for recommendation:** As a Local Planning Authority, East Devon has a duty to provide a supply of suitable sites to meet the demand for self/custom build housing shown on the self-build register. The Council also has a duty to take account of the register when exercising its planning, regeneration, housing and estate management functions. National Planning Practice Guidance requires local planning authorities to consider how they can support self and custom building in their areas. The Government supported Right to Build Task Force is working with the Council to provide expert advice on how to support self-building in East Devon.

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<b>Financial implications:</b>	There are no specific financial implications.
<b>Legal implications:</b>	The legal implications are as set out within the report.
<b>Equalities impact:</b>	Low Impact
<b>Risk:</b>	<p>Medium Risk</p> <p>The increased delivery of land for self-build and custom build purposes is a government priority and there is a duty to provide sufficient serviced plots to meet the demand shown on the register.</p>
<b>Links to background information:</b>	<ul style="list-style-type: none"> <li>• <a href="#">Report to Strategic Planning Committee 20/03/18</a> (previous monitoring report and discussion of ways to promote self-build)</li> <li>• <a href="#">Minutes of Strategic Planning Committee 20/03/18</a></li> <li>• <a href="#">Report to Strategic Planning Committee 29/03/17</a> (initial self-build monitoring, imposition of local connection test, decision not to impose financial test or fee for self-build register)</li> <li>• <a href="#">Minutes of Strategic Planning Committee 29/03/18</a></li> <li>• <a href="#">Self Build Portal</a> of the National Custom and Self Build Association (NaCSBA)</li> <li>• <a href="#">Right to Build Task Force</a></li> <li>• <a href="#">Self-build and custom build - East Devon</a></li> <li>• Greater Exeter Strategic Plan Custom and Self-build <a href="#">Demand Assessment Framework</a></li> <li>• <a href="#">Cranbrook Demand Assessment</a></li> <li>• <a href="#">Cranbrook Plan - Cranbrook Plan Submission Draft - East Devon</a></li> <li>• <a href="#">Teignbridge Custom and Self Build SPD</a></li> <li>• <a href="#">Housing and Planning Act 2016</a></li> <li>• <a href="#">Self-build and Custom Housebuilding Act 2015</a></li> <li>• <a href="#">Fixing our broken housing market - GOV.UK</a></li> <li>• <a href="#">Self-build and custom housebuilding - GOV.UK</a> (National Planning Practice Guidance)</li> </ul>
<b>Link to Council Plan:</b>	<p>Encouraging communities to be outstanding</p> <p>Develop an outstanding local economy.</p>

## Report in full

### 1. The requirements for and advantages of self-build housing

- 1.1 As part of its drive to increase levels of housebuilding, the Government is encouraging Councils to diversify the range of opportunities by increasing the supply of self-build plots. There is a legal requirement for Local Authorities to hold a register of people wishing to self-build and to 'permission' enough 'serviced plots' to meet the demand shown on the register. The definition of a 'serviced plot' is that it can, in the opinion of the local planning authority, be provided with access to a public highway and connections for electricity, water and waste water (Self-build and Custom Housebuilding Act 2015 as amended by the Housing and Planning Act 2016). There is limited guidance on what needs to be done to fulfil this requirement, but for our current monitoring figures we have included any planning permission to build a single dwelling (excluding conversions of existing buildings). This is justified because land with planning permission to build a single dwelling could be suitable

for self-build and has been the traditional source of self-build plots (usually as 'windfalls'). However, research undertaken with those on our register to inform the March 2018 report to this committee suggested that there is still a lack of sites that people on the register can afford. More needs to be done if the Council wishes to ensure that the spirit of the legislation (to improve the supply of land for self-build) is being met as well as the basic legislative requirements.

- 1.2 The [National Planning Practice Guidance](#) recommends that "Relevant authorities should consider how they can best support self-build and custom housebuilding in their area. This could include:
- developing policies in their Local Plan for self-build and custom housebuilding;
  - using their own land if available and suitable for self-build and custom housebuilding and marketing it to those on the register;
  - engaging with landowners who own sites that are suitable for housing and encouraging them to consider self-build and custom housebuilding and facilitating access to those on the register where the landowner is interested; and
  - working with custom build developers to maximise opportunities for self-build and custom housebuilding."
- 1.3 Self-build is a term that is used to refer to a wide range of activities from individuals or groups physically building their own homes, through to 'custom' build, where specialist developers are contracted. The key element in any self-build is that the buyer occupies the house for themselves and has had principle control over the plans and specifications of the house that gets built.
- 1.4 One of the wider benefits of self-build is its potential to speed up the supply of housing and thereby help to maintain a five year supply of housing (particularly where custom build developers offer 'shell homes' on larger sites). It can also help to diversify the land supply and widen choice including different levels of affordability. Self-build can lead to savings relative to buying a 'ready-made' product because there is no developer profit (often at least 20% of the cost of a new home) and because self-builders may do some of the work themselves (like project managing or physical building). Conversely some self-build projects are high end bespoke homes that can cost above market value to build. An element of this additional cost is often spent on improved energy performance and typically custom built homes have higher design and energy specifications to help differentiate them from the volume house building model.
- 1.5 Wider community benefits of self-build include homes with a better design, build quality and environmental footprint and a more diverse and resilient housing supply. The White Paper ['fixing our broken housing market'](#) quotes research that self-builders use modern methods of construction and build to high specifications thereby improving the sustainability of the housing stock.
- 1.6 Self-build is also good for local businesses and can provide additional employment opportunities. It is an attractive market to small and medium house builders because there is less risk as contracts are settled earlier in the development process. This enables construction to be financed through the customer's mortgage stage payments, which reduces business finance and improves profitability. Supporting smaller builders can help local economies by using more local supply chains than volume house builders and creating opportunities for local tradespeople.

## **2 Supply and demand figures**

- 2.1 The East Devon register has a local connection test so that, generally, only people who work in the District or have lived here for three years are included on 'Part 1'. The requirement to provide enough serviced plots to meet the demand shown on the register only applies to Part 1, but both Part 1 and 2 are used to assess the general level of demand to inform decisions of the Council.
- 2.2 The level of demand is measured in 'base periods' that run from the end of each October. In the 2017 to 2018 base period a total of 18 individuals were added to the register; 9 on Part 1 and 9 on Part 2. A [monitoring report](#) that gives further details of the preferred type of home, location and size of plot has been published.
- 2.3 To meet statutory requirements 9 plots suitable for self-build need to gain permission in the three years from 31<sup>st</sup> October 2018 to meet the demand indicated on Part 1. This compares with a total of 40 in the previous base period and 32 in the first base period (when there was no local connection test).
- 2.4 Following the approach agreed last year, planning permissions for single dwellings have been considered to be suitable for self-building. From 31<sup>st</sup> October 2017 to 30<sup>th</sup> October 2018 there were 36 consents for individual dwelling plots in East Devon. Taken together with the 75 plots consented to October 2016 and the 80 to October 2017 it is clear that we are meeting our statutory requirements (note that the lower number of plots permissioned to October 2018 partly reflects the omission of prior notification applications that may be considered less suitable for self-build).

## **3. Current EDDC approach to self-build**

- 3.1 At the moment we comply with the statutory requirements for self-build by keeping a register and permissioning sufficient plots to meet the demand indicated on Part 1 (of the register). The purpose of the register is to provide an indication of the general level of interest and there is no requirement to match people on the register with suitable land. Both the District and County Council must 'have regard' to the register when exercising their planning, housing, regeneration and disposal of land functions. More details are given on the practical implications of this in the [National Planning Practice Guidance](#) but examples include:
- Planning – the register may be a material consideration in decision-taking and evidence of local demand should be used to devise appropriate local plan policies;
  - Housing – evidence from the register should be used when preparing local housing strategies and when developing plans for new housing on land owned by the local housing authority;
  - Land disposal – evidence of demand from the register should be considered when developing plans to dispose of land; and
- Regeneration - evidence of demand from the register should be considered when developing regeneration plans.
- 3.2 Policy H2 of the adopted Local Plan encourages 10% of plots on large sites to be made available for custom and self-building, although no plots have yet been secured through this policy.



- 3.3 At the March 2018 meeting of this Committee a report was considered that looked at ways that more could be done to encourage self-building in East Devon. Members were generally supportive of exploring how this could be achieved and asked that further work was done, including working with other authorities involved in the Greater Exeter Strategic Plan.
- 3.4 In July 2018 [research](#) undertaken by Three Dragons (supported by the Right to Build Task Force) was published that considered the underlying demand for self-build in each of the greater Exeter authorities. This modelled a projected need for 61 plots in East Devon for the first five years and 67 plots in the years thereafter. With the exception of Teignbridge, the modelled demand was more than that shown on the associated registers. The research also found that the current rates of supply fall below the potential demand indicated by the modelling, implying that positive action is required by the responsible authority to enable faster rates of self-building.
- 3.5 Three Dragons also modelled the underlying demand for [self-build at Cranbrook](#). This concluded that, to 2031, provision should be made for around 170 self-build plots at Cranbrook of which around 15 should be affordable (intermediate market). The report has been used as evidence to justify a self-build policy (CB12) in the submission draft of the [Cranbrook Plan](#) (February 2019). Policy CB12 requires a minimum of 4% of dwellings in the expansion areas to be for custom and self-build unless more demand is shown through an annual review. It is hoped that this will secure delivery of a significant increase in opportunities for self-builders and allow for flexibility to respond to any increase in demand for self-build at Cranbrook.

#### 4 Right to Build Task Force

- 4.1 The [Right to Build Task Force](#) is funded by the Nationwide Foundation and supported by central government. Its aim is to support local authorities, community groups and other organisations to deliver large, affordable custom and self-build housing projects.
- 4.2 In July 2018 the Right to Build Task Force was engaged to provide support to EDDC on custom and self-build housing delivery with an emphasis on potential delivery routes at Cranbrook. This work will be taken forward through the Cranbrook Plan and possibly a Supplementary Planning Document allied to the draft self-build policy.
- 4.3 As part of their remit the Task Force facilitated workshops with EDDC officers and members in December 2018 to raise awareness of the potential for self-build and suggest options for increasing opportunities to self-build. The outcome of the workshops was very positive with general support for promoting self-build to meet housing demands, including for affordable housing. Some concerns were expressed, particularly over the loss of CIL income (self-build is exempt from CIL) and the potential for people to make a profit and move on.
- 4.4 In order to explore the full potential for EDDC to promote self-build opportunities across East Devon it will be necessary to involve a wide range of disciplines. One idea that seemed popular at the Member workshop was the establishment of a Member officer task group to devise a delivery plan for self-build. This could help to co-ordinate the actions of planning, regeneration, estates, housing and legal services and could consider the full range of options open to the Council. This could include:
- planning strategies (including 'exception' policies and allocations) as part of the new local plan or through neighbourhood planning;

- an audit of Council owned land with a review of every area of land we own to establish whether it can be marketed for self-build housing (this could result in capital receipts as well as improve the supply of self-build plots);
- a refresh of the self-build register to include a specific Cranbrook register linked to the promotion specific sites that emerge. Work undertaken by the Right to Build task force indicates that the current register may significantly underestimate demand: additional promotion of the register would be likely to lead to higher demand numbers and could be used to help negotiate with developers for additional self-build plots in accordance with Policy H2 ;
- the use of housing land owned by EDDC to promote affordable self-build opportunities. This could be on a small scale where 'surplus' land may be suitable for infill plots or for larger areas such as redundant garage courts or any areas suitable for redevelopment;
- working with parish councils and local community groups to promote self-build opportunities. For example parish councils may own parcels of land that may be suitable for self-build or they may wish to include policies in their neighbourhood plans. Community groups like land trust may wish to explore options to promote self-build, particularly for group projects that could help to meet local objectives such as low cost housing for local people or providing housing for the elderly; and
- producing Supplementary Planning Guidance to clarify self-build requirements. This could be linked to Policy H2 of the local plan and the emerging CB12 Cranbrook policy and would help to set out the East Devon approach to delivering self-build and minimum requirements. Teignbridge produced an [SPD](#) in 2016 which gives further guidance on their local plan policy and deals with associated issues like CIL and building control.

## 5 Conclusions

- 5.1 We are meeting our statutory requirements for self-build but could do a lot more to promote opportunities in accordance with government guidance.
- 5.2 Increasing the levels of self-build has many potential benefits including:
- improving the resilience of the local housing supply by reducing the dependence on volume house builders for delivery;
  - helping the economy by providing opportunities for local employment and businesses;
  - improving the variety, design and sustainability of the housing stock;
  - helping local communities to meet their housing needs; and
  - improving opportunities for those wishing to have a tailor made home at an affordable price (or to pay for a house that suites their individual tastes regardless of price).
- 5.3 At the member workshop run by the Right to Build Task Force there was support for doing much more to support self-build housing in East Devon and for the formation of a Member officer task group to produce a delivery plan to achieve this. If the recommendation to form a task group is supported, the group will need to include representatives of all the sections of the Council that need to 'have regard' to the self-build register. This would include people from planning, housing, regeneration and estates and could also include an element of joint working with Devon County Council (which also has a duty to have regard to the self-build register). The task force is also envisaged to include leading Members involved in the delivery of housing and community planning.



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

**Date of Meeting:** Tuesday 26 March 2019

**Public Document:** Yes

**Exemption:** None

**Review date for release** None

**Agenda item:** 11

**Subject:** **Draft Affordable Housing Supplementary Planning Document**

**Purpose of report:** To provide an overview of the draft Affordable Housing Supplementary Planning Document (SPD). The SPD is presented for approval by this Committee for a six week period of public consultation.

**Recommendation:** **Members are asked to approve the draft Affordable Housing Supplementary Planning Document for public consultation over a period of six weeks.**

**Reason for recommendation:** To ensure public consultation is undertaken and feedback duly considered in preparing the Affordable Housing SPD.

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

**Legal implications:** There are no legal implications other than as set out in the consultation report.

**Equalities impact:** Low Impact

An Equalities Impact Assessment of the draft Affordable Housing SPD has been prepared, and will be published alongside the SPD. This identified that there would be no adverse impacts upon those people with “protected characteristics”. There would be positive impacts upon “age” through encouraging affordable housing provision for young people to buy and rent, and “disability” through guidance on enhanced standards for accessible and adaptable homes.

**Risk:** Low Risk

The SPD is being prepared in accordance with plan-making regulations, the council agreed protocol for preparing SPDs, and the adopted Statement of Community Involvement.

**Links to background information:**

- [Draft Affordable Housing SPD Screening report for Strategic Environmental Assessment and Habitats Regulations](#)
- [Draft Affordable Housing SPD Equalities Impact Assessment](#)
- [East Devon Local Plan 2013-2031](#)
- [East Devon Local Development Scheme \(July 2018\)](#)
- [Supplementary Planning Guidance Protocol](#)
- [National Planning Policy Framework](#)



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

## **Report in full**

### **Background**

1. Members will be aware that the East Devon Local Plan 2013-2031 facilitates the delivery of affordable housing in appropriate locations, through policies relating affordable housing targets (Strategy 34) and rural exception sites (Strategy 35). Another Local Plan policy (Strategy 36) requires all affordable housing to meet accessible and adaptable dwellings standards on sites of 10 or more homes.
2. The Local Development Scheme, approved by this Committee on 11 July 2018, states that an Affordable Housing supplementary planning document (SPD) will be prepared to elaborate on policy to secure affordable housing provision in East Devon. In addition, on 20 March 2018, this Committee agreed a protocol for preparing SPDs. It is important to note that SPDs can only add further detail to policies in the development plan, and cannot set policies themselves.
3. Therefore, following the agreed protocol, and in discussion with key internal officers, a draft Affordable Housing SPD has now been prepared for public consultation. The SPD begins with a brief overview of affordable housing and related planning policy, some contextual information on affordable housing in East Devon, and then provides guidance on affordable housing issues relevant to Local Plan policies, across the following chapters:
  - Thresholds and targets
  - Tenure and mix
  - Design and layout
  - Rural exception sites
  - Pre-application, legal agreements and occupancy
4. Appendices include maps showing which affordable housing thresholds apply across the district, Local Plan policies on affordable housing, and the standard section 106 agreement for securing affordable housing.
5. The SPD is structured around a series of key questions so that the guidance is provided in a clear, accessible format. The SPD is accompanied by a Strategic Environmental Assessment and Habitats Regulations screening report, and an Equalities Impact Assessment (EqIA). These conclude there would be not be significant effects on the environment or habitats; and there would be no adverse impacts upon people with “protected characteristics” with regards to equalities.

### **Purpose of the SPD**

6. The Affordable Housing Supplementary Planning Document has been drafted to provide greater clarity to developers and communities about the expectations for affordable housing delivery in the district. By giving clear guidance upfront about our expectations in terms of tenure mix, how vacant building credit will be operated, where off-site contributions will be appropriate etc. It will enable developers and landowners to understand our requirements better.
7. The value paid for the land is often the biggest influence over the viability of a development and so ensuring that developers and land owners fully understand our requirements when undertaking negotiations over land values is key to ensuring that the value that is agreed is realistic and takes account of the true costs to the development of providing affordable

housing. In doing this it is hoped that the amount of affordable housing delivered can be maximised and issues with viability reduced.

8. Another important factor is that the National Planning Policy Framework has recently been updated in a number of key areas that impact on affordable housing including the definition of affordable housing that has changed introducing a number of new products. The NPPF also now gives clearer guidance on viability and the assessment of land values and Homes England have interpreted this new guidance in their recent decisions on funding. As a result there is a need for the Council to issue clear guidance responding to this and to provide clarity about how the policies of the Local Plan will be applied in light of these changes.
9. Finally the SPD provides a valuable opportunity to provide further guidance and clarity over issues that are frequently questioned and challenged by developers. A key example of this is the issue of the pepper potting of the affordable units within developments. While this is already a policy requirement the degree of pepper potting and the size of clusters have been key areas of dispute with developers and so providing further clarity will both help to guide developers when designed schemes and aid decision making.

### **Next steps**

10. Assuming the recommendation to consult on the draft Affordable Housing SPD is resolved, a six week period of public consultation will follow, running into May 2019. We will then consider the representations received, and amend the SPD (and potentially the screening report and EqlA) as required. This (potentially revised) version of the SPD will be brought back to this Committee to consider and approve a second round of public consultation, likely in summer 2019. Again, the consultation responses will be considered, and the SPD amended as appropriate. Another report will then be brought to Strategic Planning Committee that will recommend to Cabinet that the Affordable Housing SPD is adopted.
11. Given these remaining stages, it is likely that the Affordable Housing SPD will be adopted in late 2019 or early 2020.

## Planning policy consultation

# Draft Affordable Housing Supplementary Planning Document



March 2019.

East Devon – an outstanding place



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# 1 Introduction

- 1.1 The East Devon Local Plan 2013 to 2031 (adopted January 2016) promotes the delivery of new affordable housing in the district, through policies relating to affordable housing targets and exceptions sites.
- 1.2 The purpose of this Affordable Housing supplementary planning document (SPD) is to provide guidance on the implementation of affordable housing policies in the East Devon Local Plan 2013 to 2031, and the Cranbrook Plan (when adopted).<sup>1</sup> This should assist applicants when making planning applications, and the council in determining them.
- 1.3 The SPD explains when and how affordable housing will be secured in order to deliver sustainable communities in East Devon. It reflects national Government policy on affordable housing in the National Planning Policy Framework, and has been prepared in a manner consistent with the relevant regulations.<sup>2</sup>
- 1.4 The SPD begins by providing some context with a brief overview of affordable housing and related planning policy, and then provides guidance across a series of chapters on affordable housing issues relevant to Local Plan policies. The SPD is structured around a series of key questions so that the guidance is provided in a clear format.

## Consultation details

- 1.5 This draft Affordable Housing SPD is being published for consultation from **xxxx to xxxx** **ALLOW 6 WEEKS**. The SPD is supported by a screening report for Strategic Environmental Assessment and Habitats Regulations Assessment; along with an Equality Impact Assessment. The screening report concludes that the SPD would not lead to significant effects on the environment or habitats; and no adverse impacts upon people with “protected characteristics” with regards to equalities. The SPD and supporting documents can be seen on our website: **INSERT WEBLINK**
- 1.6 Consultation responses on the SPD and screening reports must be submitted in writing by email to [planningpolicy@eastdevon.gov.uk](mailto:planningpolicy@eastdevon.gov.uk) or by post to Planning Policy, East Devon District Council, Blackdown House, Border Road, Heathpark Industrial Estate, Honiton EX14

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<sup>1</sup> National Planning Policy Framework, Annex 2, explains that SPDs can add further detail to the policies in the development plan; and Planning Practice Guidance Reference ID: 12-028-20140306 states that SPDs should build upon and provide more detailed advice or guidance on the policies in the Local Plan, and should not add unnecessarily to the financial burdens on development.

<sup>2</sup> The Town and Country Planning (Local Planning) (England) Regulations 2012:  
<http://www.legislation.gov.uk/uksi/2012/767/contents/made>



1EJ. Consultation responses will be published on the council's website. This will include your name and address but contact details and signatures will be redacted.

## **Data Protection**

- 1.7 Any personal information which you provide will be held and used by East Devon District Council for the purpose of the Affordable Housing supplementary planning document and may inform other planning policy work. Your information may also be shared within East Devon District Council for the purposes of carrying out our lawful functions. Otherwise your personal information will not be disclosed to anybody outside East Devon District Council without your permission, unless there is a lawful reason to do so, for example disclosure is necessary for crime prevention or detection purposes. Your information will be held securely and will not be retained for any longer than is necessary. There are a number of rights available to you in relation to our use of your personal information, depending on the reason for processing. Further detail about our use of your personal information can be found in the relevant Privacy Notice.<sup>3</sup>

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<sup>3</sup> The relevant Data Protection Privacy Notice can be seen at: <http://eastdevon.gov.uk/media/2764832/planning-policy-considering-representations-in-respect-of-neighbourhood-plans-and-development-plans.pdf>

## 2 Context and Overview of Policies and Evidence

### What is affordable housing?

- 2.1 There are four broad types of affordable housing, as defined in the National Planning Policy Framework<sup>4</sup>:

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

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

b) **Starter homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household’s eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.

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

d) **Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be

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<sup>4</sup> National Planning Policy Framework, Annex 2:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/740441/National\\_Planning\\_Policy\\_Framework\\_web\\_accessible\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf)

provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.”

## Who delivers new affordable housing?

- 2.2 Planning policies require a certain proportion of affordable housing, or off-site contribution for their delivery elsewhere, in order for planning permission for new housing to be granted – it is through this process that the vast majority of affordable housing is delivered.
- 2.3 In most cases, new affordable homes to *rent* are constructed by private developers and sold to registered providers<sup>5</sup> (RPs) at a discounted price. The RP then lets out these properties to eligible households – the maximum level of rent that is covered by housing benefit (being replaced by Universal Credit) is set according to the number of bedrooms and the location.<sup>6</sup> The RP is responsible for their ongoing management (apart from Build to Rent affordable housing, where the landlord need not be a registered provider). RPs currently operating in East Devon can be seen in [chapter seven](#).
- 2.4 New affordable homes to *buy* are also generally constructed by private developers and either sold to RPs, or made available directly by the developers. These homes can then be purchased by eligible households at below market values. Another route to affordable home ownership is in the form of rent to buy, such as homes provided by ‘Rentplus’, who purchase new properties and lease them to RPs to manage and let to eligible households at an affordable rent (set at 80% of market rent). Tenants are given five-year renewable tenancy agreements by Rentplus, and have the opportunity to purchase the property at five yearly intervals up to 20 years – all Rentplus homes are sold after 20 years, to the occupier or RP or, if not, then on the open market.<sup>7</sup>
- 2.5 Other, less common, routes of affordable housing delivery include schemes funded by Government grant, or schemes led by RPs who may obtain planning permission and construct affordable homes to rent or buy themselves.
- 2.6 In some cases, completed affordable homes may be passed to EDDC to add to its own housing stock or to the councils’ local housing company East Devon Homes.

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<sup>5</sup> Registered Providers are independent, not-for-profit companies set up to provide affordable homes for people in need. They are funded and regulated by Homes England.

<sup>6</sup> Local Housing Allowance rates are used to set the maximum level of rent that can be charged by an RP. The rates in East Devon can be seen here: <http://lha-direct.voa.gov.uk/SearchResults.aspx?LocalAuthorityId=209&LHACategory=999&Month=2&Year=2019&SearchPageParameters=true>

<sup>7</sup> Further information can be seen on the Rentplus website: <http://rentplus-uk.com/>



- 2.7 Community land trusts (CLTs) can also deliver affordable housing. These are non-profit organisations for the ownership and/or management of assets (e.g. housing) for the benefit of the local community, and can be set up by communities in towns as well as more rural areas. Once a CLT has been set up, they can own land and commission the construction of homes that are made affordable to rent or buy for local people (for example through leasing the homes to a RP). The CLT then remains a long term steward of homes and assets.<sup>8</sup> A notable CLT in East Devon is Beer Community Land Trust, which has already delivered affordable housing in the village, and has plans to deliver more.<sup>9</sup>



Affordable housing delivered by Beer Community Land Trust

- 2.8 Finally, East Devon District Council spend receipts from the 'Right to Buy' to purchase dwellings on the open market, which are then managed by the council as affordable housing to rent. The council has a target of acquiring 20 dwellings per year via this method.<sup>10</sup> Right to Buy receipts have to be spent within three years, otherwise they are returned to Government (with interest), although the Government is considering more flexibility on this.<sup>11</sup>

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<sup>8</sup> Further information on CLTs is available here: <http://www.communitylandtrusts.org.uk/>

<sup>9</sup> Beer Community Land Trust: <http://www.beerclt.org/>

<sup>10</sup> East Devon District Council Housing Strategy 2017: <http://eastdevon.gov.uk/housing/housing-strategies-and-policies/housing-strategy/>

<sup>11</sup> Government consultation on 'Use of receipts from Right to Buy sales' August – October 2018: <https://www.gov.uk/government/consultations/use-of-receipts-from-right-to-buy-sales>

### How much affordable housing is there in East Devon?

- 2.9 There are a total of 68,370 dwellings in East Devon, of which 6,520 are “affordable”. East Devon District Council own 4,200 of these affordable dwellings, and the other 2,320 are owned by RPs.<sup>12</sup>
- 2.10 Around 25 social rented homes are purchased by tenants from the council each year under the ‘Right to Buy’ – where council housing tenants have a right to buy their home at a discount, with the amount of discount dependent upon the length of time as a social tenant.<sup>13</sup>

### How “affordable” is housing in East Devon?

- 2.11 The average house price in East Devon is £264,995, which is 9.8 times average earnings.<sup>14</sup> This makes East Devon a less affordable place to buy a house than both the England (7.9) and south west region (8.8) average.<sup>15</sup> The following graphs show average house prices in East Devon since 1997, along with the affordability ratio that compares house prices to earnings. These indicate that house prices trebled between 1997 and 2007, but were then broadly stable until a rise in 2017. The affordability ratio doubled from 5 to 10 between 1997 and the mid-2000s, and house prices have remained around 10 times earnings ever since.

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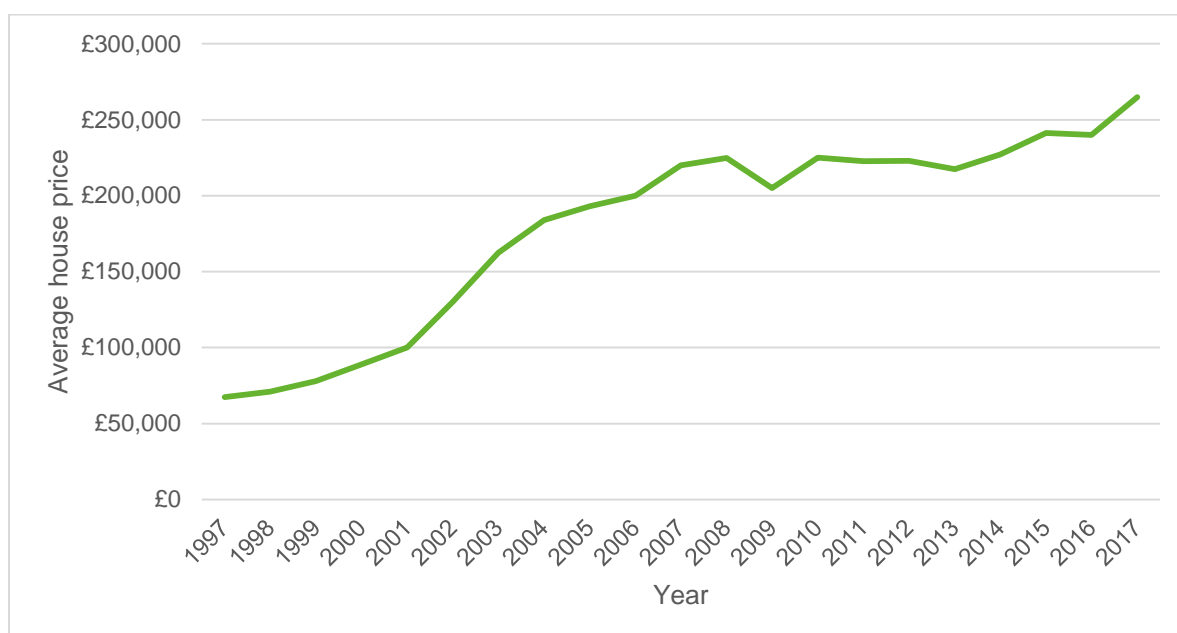
<sup>12</sup> Number of dwellings by tenure and district, England, 2017, Table 100: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

<sup>13</sup> In 2012, the Government significantly raised the maximum cash discount under the Right to Buy. This had the effect of increasing the number of social rented homes purchased under the Right to Buy in East Devon from around 3-4 dwellings per year between 2007 and 2012, to around 25 dwellings per year from 2012 to 2017. Source: Annual Right to Buy Sales: Sales by Local Authority, Table 685: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-social-housing-sales#other-schemes>

<sup>14</sup> Ratio of median house price to median gross annual workplace-based earnings by local authority district, 2017, Office for National Statistics: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2017>

<sup>15</sup> Ibid.

**Figure 2.1: Average house price in East Devon 1997 – 2017<sup>16</sup>**



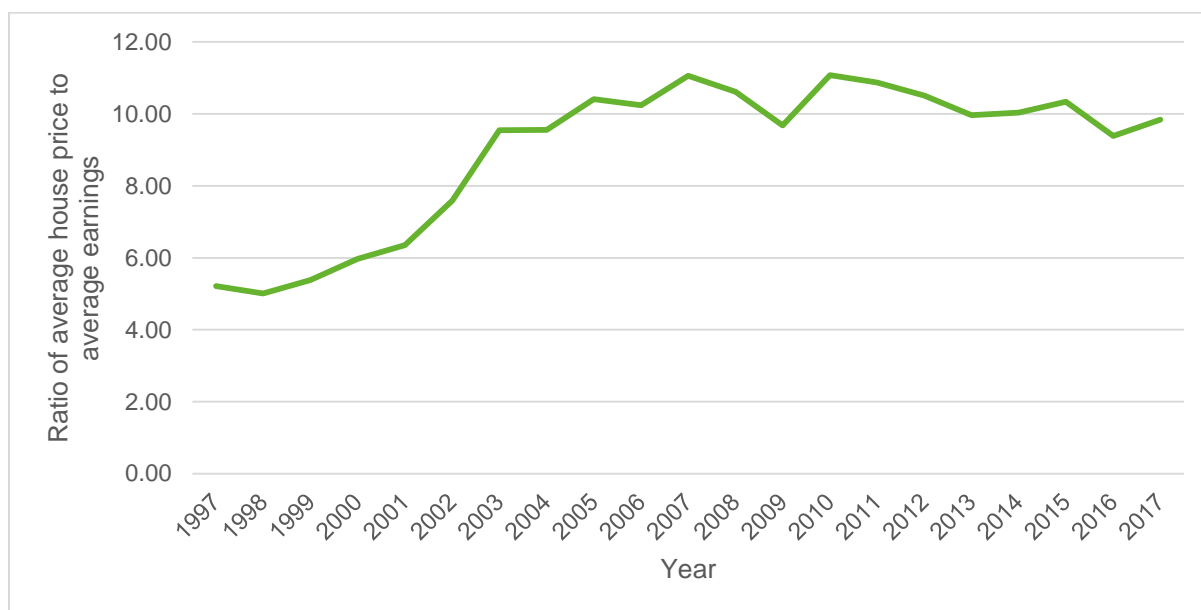
**Figure 2.2: Affordability ratio in East Devon 1997 – 2017<sup>17</sup>**

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<sup>16</sup> Median house price by local authority district, 2017, Office for National Statistics:  
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2017>

<sup>17</sup> Ratio of median house price to median gross annual workplace-based earnings by local authority district, 2017, Office for National Statistics:  
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2017>





- 2.12 It is also worth noting that house prices vary across East Devon – for example, in general, the coastal towns of Sidmouth and Budleigh Salterton are more expensive than elsewhere.

### **What is national Government policy on the delivery of affordable housing?**

- 2.13 The National Planning Policy Framework (NPPF) supports the Government's objective to significantly boost the supply of homes.<sup>18</sup> The type of affordable housing required should be set out in planning policies, and this need should be met on-site unless off-site provision or a financial contribution can be robustly justified and it would contribute to creating mixed and balanced communities.<sup>19</sup>
- 2.14 Affordable housing "*should not be sought for residential developments that are not major developments*" i.e. 10 dwellings or more, or a site area of 0.5 ha or more. In 'designated rural areas',<sup>20</sup> policies may set out a lower threshold of 5 units or fewer. Affordable housing contributions should be reduced where vacant buildings are being reused or redeveloped.<sup>21</sup>

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<sup>18</sup> National Planning Policy Framework, paragraph 59:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/740441/National\\_Planning\\_Policy\\_Framework\\_web\\_accessible\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf)

<sup>19</sup> National Planning Policy Framework, paragraph 62.

<sup>20</sup> Defined in the NPPF as "National Parks, Areas of Outstanding Natural Beauty and areas designated as 'rural' under section 157 of the Housing Act 1985."

<sup>21</sup> National Planning Policy Framework, paragraph 63.

- 2.15 As part of the overall affordable housing contribution on major sites, at least 10% of homes should be available for affordable home ownership, subject to various exemptions (e.g. significantly prejudicing the ability to meet the needs of specific groups).<sup>22</sup>
- 2.16 Local authorities should support entry-level exception sites of affordable housing for first time buyers or renters, unless such need is already being met elsewhere in the area. These sites should be adjacent to existing settlements, proportionate in size to them (no larger than one hectare or exceed 5% of the size of the existing settlement), should not compromise national designations, and comply with local design policies.<sup>23</sup>
- 2.17 Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, allowing some market housing where necessary to facilitate this.<sup>24</sup> Rural exception sites are discussed further in [chapter 6](#).
- 2.18 In recent years, Government funding has prioritised affordable home ownership, rather than rent, through a variety of schemes – such as encouraging the Right to Buy, starter homes and Help to Buy.<sup>25</sup> Consultation on a social housing green paper seeks to address issues in this sector, indicating a re-commitment to affordable housing to rent.<sup>26</sup>

### **Which Local Plan policies discuss affordable housing?**

- 2.19 The East Devon Local Plan 2013 to 2031<sup>27</sup> contains two policies that solely related to affordable housing:
- Strategy 34 – ‘District Wide Affordable Housing Provision Targets’ is the overarching policy on affordable housing, setting targets for different parts of East Devon, the tenure mix, and thresholds, amongst other issues.
  - Strategy 35 – ‘Exception Mixed Market and Affordable Housing At Villages, Small Towns and Outside Built-up Area Boundaries’ provides for exceptions housing schemes, subject to robust evidence.

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<sup>22</sup> National Planning Policy Framework, paragraph 64.

<sup>23</sup> National Planning Policy Framework, paragraph 71.

<sup>24</sup> National Planning Policy Framework, paragraph 77.

<sup>25</sup> What is Affordable Housing? Parliamentary briefing paper, September 2018, para 3.2:  
<http://researchbriefings.files.parliament.uk/documents/CBP-7747/CBP-7747.pdf>

<sup>26</sup> A new deal for social housing, MHCLG, August 2018:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/733605/A\\_new\\_deal\\_for\\_social\\_housing\\_web\\_accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733605/A_new_deal_for_social_housing_web_accessible.pdf)

<sup>27</sup> East Devon Local Plan 2013 to 2031: <http://eastdevon.gov.uk/media/1772841/local-plan-final-adopted-plan-2016.pdf>

- 2.20 In addition, Strategy 36 states that, on sites of 10 dwellings or more, all of the affordable housing should meet part M4(2) of the Building Regulations relating to accessible and adaptable dwellings.

### **What other local guidance is there on affordable housing in East Devon?**

- 2.21 East Devon's Planning Obligations SPD (June 2017) reflects the affordable housing targets and tenures in the Local Plan, along with the thresholds set out in national policy (at that time – the revised NPPF has subtly changed the thresholds).<sup>28</sup> Affordable housing should be delivered in phase with the market housing, and proposals for non-compliant tenure splits will only be accepted in exceptional circumstances which must be evidenced by the applicant (see paragraph 4.2). Rural exception sites should reflect the need in a Rural Housing Needs Survey. The SPD also contains guidance on overage and viability.
- 2.22 East Devon District Council's Housing Strategy<sup>29</sup> sets out its responsibilities to:
- Provide a housing options service for all who are homeless or threatened with homelessness
  - Provide, maintain, and manage our own council housing stock
  - Work with housing developers and housing associations to deliver more affordable housing
  - Regulate and improve other social rented, private rented and owner occupier housing
- 2.23 Guidance on how to find affordable housing, what the council is doing to increase the number of properties, and how affordable housing need is assessed, can be seen on the councils' website.<sup>30</sup>
- 2.24 Guidance notes on viability are also available on the councils' website, several of which are relevant in cases where an applicant is seeking to justify less affordable housing than required in the Local Plan.<sup>31</sup>

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<sup>28</sup> East Devon Planning Obligations Supplementary Planning Document, June 2017:  
<http://eastdevon.gov.uk/media/2140634/final-version-for-adoption.pdf>

<sup>29</sup> EDDC Housing Strategy: <http://eastdevon.gov.uk/housing/housing-strategies-and-policies/housing-strategy/>

<sup>30</sup> This guidance can be seen at: <http://eastdevon.gov.uk/housing/affordable-housing-in-east-devon/>

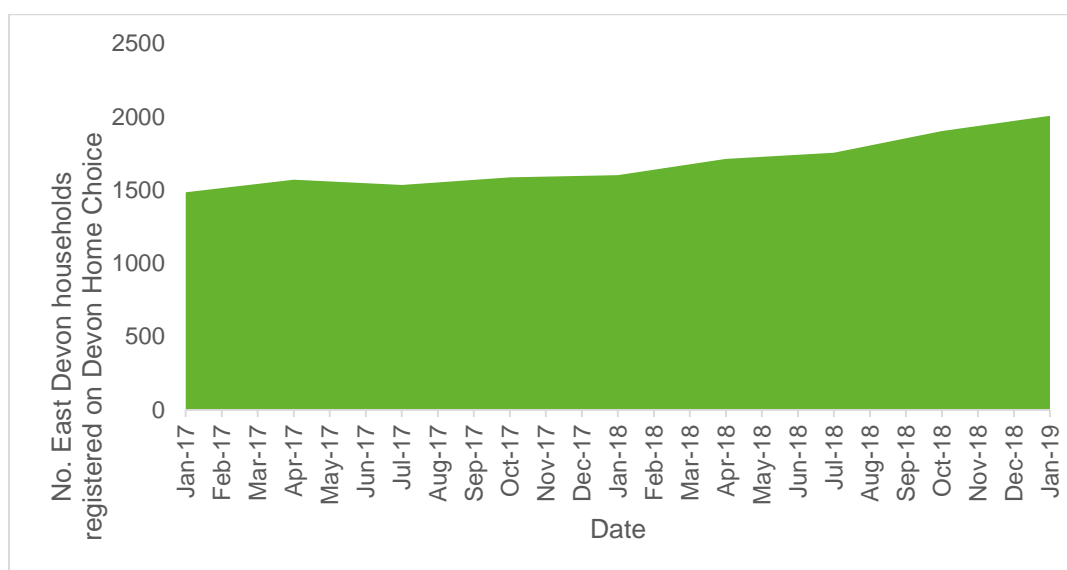
<sup>31</sup> EDDC viability guidance notes can be seen at: <http://eastdevon.gov.uk/planning/planning-services/planning-development-management/viability-guidance-notes/>



## What are the key sources of evidence regarding affordable housing need in East Devon?

- 2.25 The Strategic Housing Market Assessment (SHMA) 2014/15 contains detailed evidence on housing need in East Devon.<sup>32</sup> This identifies an annual affordable housing need of 272 dwellings per year in East Devon. It also makes recommendations on the future delivery of affordable housing need on issues such as tenure mix and number of bedrooms required, which informed the Local Plan.
- 2.26 Devon Home Choice is a choice-based lettings scheme, enabling people to register for social and affordable rented homes from Registered Providers or local authorities across Devon. Devon Home Choice produce a quarterly monitoring report providing on the number of households registered on the scheme and applications received for social and affordable rented affordable housing, giving an indication of housing need.<sup>33</sup> The latest report (January 2019) shows 2,000 households registered in East Devon, a figure that has increased over the last two years (see figure 2.3) below. An indication of this need is the fact there were an average of 53 bids per property in East Devon during the first quarter of 2018/19.<sup>34</sup>

**Figure 2.3: Number of households in East Devon registered on Devon Home Choice, 2017-19**



<sup>32</sup> Exeter Housing Market Area, Strategic Housing Market Assessment 2014/15:

<http://eastdevon.gov.uk/media/996504/exeter-shma-final-report-16-03-15.pdf>

<sup>33</sup> Devon Home Choice Quarterly Monitoring Reports can be seen here: <https://www.devonhomechoice.com/useful-information-0>

<sup>34</sup> Devon Home Choice Quarterly Monitoring Report, January 2019, table 7:

[https://www.devonhomechoice.com/sites/default/files/DHC/dhc\\_monitoring\\_report\\_-\\_jan\\_2019.pdf](https://www.devonhomechoice.com/sites/default/files/DHC/dhc_monitoring_report_-_jan_2019.pdf)

- 2.27 Housing need surveys can be prepared to establish the level and nature of current and future housing need in a specific area. EDDC fund Devon Communities Together (DCT) to undertake such surveys for three parish councils each year, but DCT will also undertake surveys on behalf of landowners, developers, and planning agents. This can provide the evidence to justify development in an area, particularly for affordable housing.



Affordable housing in Cranbrook, which has been a significant supply of affordable housing delivery in East Devon over recent years

### 3 Thresholds and Targets

#### When should affordable housing be sought in new development?

- 3.1 Local Plan Strategy 34 states that the thresholds as to when affordable housing is required will be the minimum set out in Government policy or guidance, subject to an up to date council viability assessment showing that these thresholds can be justified.
- 3.2 This means that affordable housing will be sought from 'major' residential development i.e. where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. In 'designated rural areas' affordable housing can be sought from schemes of between 6 and 9 dwellings in the form of an off-site contribution, paid upon completion of the development, to the delivery of affordable housing elsewhere. The vast majority of East Devon is within a designated rural area, with only the parishes of Exmouth, Sidmouth, Seaton and Honiton excluded. These affordable housing thresholds are explained in figure 3.1 below.

**Figure 3.1: Affordable housing thresholds<sup>35</sup>**

Location	Residential development of...		
	1 – 5 dwellings	6 – 9 dwellings	10 dwellings or more, or site area of 0.5 ha or more
The parishes of Exmouth, Sidmouth, Seaton and Honiton	No affordable housing	No affordable housing	On-site affordable housing
Rest of East Devon (including areas within the AONB in the parishes above)	No affordable housing	No affordable housing on-site; financial contribution towards off-site affordable housing	On-site affordable housing

- 3.3 The maps in [Appendix One](#) show how these thresholds apply across East Devon.<sup>36</sup>
- 3.4 Housing proposals with a low density that is below these affordable housing thresholds will be carefully scrutinised in light of national policy to promote an effective use of land.

<sup>35</sup> These thresholds do not apply to exceptions sites, which are explained further in chapter 6.

<sup>36</sup> The boundaries on the maps relate to parishes and Areas of Outstanding Natural Beauty.



National policy makes clear that “*local planning authorities should refuse applications which they consider fail to make efficient use of land*”.<sup>37</sup>

- 3.5 Similarly, proposals that artificially sub-divide sites within the same ownership or allocation will also be closely examined, so that the affordable housing threshold is not circumnavigated. In these circumstances, the council will consider the proposal as a single site for the purposes of the affordable housing threshold.

### How much affordable housing should be provided in new development?

- 3.6 When proposals for residential development meet the thresholds for providing affordable housing (set out above), the amount of affordable housing that should be provided depends upon the location. Figure 3.2 sets out the targets in Local Plan Strategy 34.

**Figure 3.2: Affordable housing targets**

Location	Target
Axminster	25%
Exmouth	25%
Honiton	25%
Ottery St Mary	25%
Seaton	25%
Major strategic ‘West End’ development sites: Cranbrook <sup>38</sup> , adjacent to Pinhoe, north of Blackhorse	25%
Rest of East Devon (apart from exception sites), including the towns of Sidmouth and Budleigh Salterton	50%
Exception sites at villages, small towns and outside built-up area boundaries	At least 66%

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<sup>37</sup> National Planning Policy Framework, paragraph 123. c):

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/740441/National\\_Planning\\_Policy\\_Framework\\_web\\_accessible\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf)

<sup>38</sup> Nb. Cranbrook Plan Submission Draft proposes 15% affordable housing in the expansion areas, although this is subject to consultation and Examination before it can be adopted.

- 3.7 The towns listed in the table above are geographically defined by their Built-up Area Boundary (BUAB). These, and the major strategic 'West End' development sites, are shown on the Local Plan policies map.<sup>39</sup>
- 3.8 The application of these targets will not always result in a 'round' number of affordable dwellings being required. For example, a scheme of 10 dwellings in Honiton will require 2.5 affordable dwellings. Clearly, it is not possible to provide half a house. In these circumstances, the remaining proportion should be paid as a commuted sum towards off-site affordable housing – these contributions are [explained below](#).



A terrace of four affordable homes, part of a larger housing development in Ottery St Mary

### **Under what circumstances might a lower amount of affordable housing be acceptable?**

- 3.9 Development proposals which do not meet the affordable housing targets must be supported by evidence that explains why the affordable housing target is *“not viable or otherwise appropriate”* (Local Plan Strategy 34). The applicant should notify EDDC as early as possible through pre-application discussions if lower levels of affordable housing are being proposed.

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<sup>39</sup> East Devon Local Plan 2013 - 2031 policies maps: <http://eastdevon.gov.uk/planning/planning-policy/local-plan-2013-2031/>

- 3.10 Evidence on viability should be undertaken by a suitably qualified professional, and should explain the viability issue, what has been done to address it, and what level of affordable housing is now being proposed. The viability assessment should follow the approach set out in national guidance<sup>40</sup> and the council's published guidance on viability.<sup>41</sup> Viability appraisals will be made available on our website.
- 3.11 The value paid for the land is often the biggest factor affecting the viability of a development. Viability appraisals will be expected to be based not on the value paid for the site but based on the existing use value of the land plus a premium for the landowner. In determining the premium for the landowner regard will be had to the approach currently taken by Homes England in assessing funding bids which is a 20% uplift on the existing use value. Regard will also be had to other up to date evidence of land values including case law where the guidance in the NPPF 2018 and any subsequent amendments have been tested.
- 3.12 The viability assessment will be reviewed by the District Valuer or a consultant commissioned by EDDC – the cost of this review will be covered by the applicant.
- 3.13 The applicant may also suggest reasons where it might not be "*otherwise appropriate*" to meet the Local Plan affordable housing targets. This would be for the applicant to justify, with regards to the specific circumstances of the proposal and site in question. An example could be that the proposal is a residential institution (use class C2) rather than a dwelling (use class C3) as there is generally not a requirement for affordable housing from C2 uses.

### **What is an overage clause, and when does it apply?**

- 3.14 An overage clause is a clause in the section 106 agreement that relates to future profits from a development. Where the viability evidence justifies a lower affordable housing requirement than the policy target, which is then accepted by the council, an overage clause will be inserted into the section 106 agreement. The purpose of this clause is to ensure that the council claws back additional profit above that initially anticipated in the viability appraisal. In other words, where a developer makes more profit than expected, a proportion of this 'additional' profit is paid to the council to help fund the provision of affordable housing that should have otherwise been provided by the development.
- 3.15 The level of 'additional' profit is established through a re-assessment of viability after completion of the scheme using the actual costs and values in the development, rather than the assumptions used at the planning application stage. EDDC seek to recover 50%<sup>42</sup> of

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<sup>40</sup> Planning Practice Guidance: <https://www.gov.uk/guidance/viability>

<sup>41</sup> Available at: <http://eastdevon.gov.uk/planning/planning-services/planning-development-management/viability-guidance-notes/>

<sup>42</sup> This is set to incentivise developers to achieve higher profits, and therefore greater sums available under the overage clause for the council to spend on delivering affordable housing.



any additional profit, capped to the amount of affordable housing that would have been required to meet the policy target. Further guidance on overage is available on the council's website.<sup>43</sup>

### **When might it be appropriate to provide affordable housing off-site?**

3.16 The clear preference is for affordable housing to be provided on the same site (as the market housing). However, the Local Plan allows affordable housing to be provided off-site in some cases, as explained below:

- *Exempted through Government policy or guidance* – Government policy<sup>44</sup> enables off-site financial contributions to be sought for sites of 6-9 dwellings in designated rural areas, therefore exempting such sites from providing affordable housing on-site.
- *Not mathematically possible* – where the affordable housing requirement results in a proportion of a dwelling (e.g. 10 dwellings in most towns would require 2.5 affordable homes) then it will clearly not be possible to provide this on-site, so the remaining proportion should be an off-site contribution.
- *No registered provider being willing to manage the new affordable units* – this may occur where a proposal includes a block of flats with mixed market and affordable dwellings that are difficult to manage separately (e.g. if they have the same block entrance), where only a few affordable homes are being proposed on-site and/or the remote location of the site. In these instances, EDDC will require evidence that a registered provider cannot be secured, along with an explanation.
- *Other planning reasons* – these reasons would be for the applicant to justify, but could include situations where off-site contributions would better achieve a mixed and balanced community such as where there is a dominance of affordable housing in the immediate locality, or where an appropriate form of affordable housing cannot be provided within a scheme.

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<sup>43</sup> <http://eastdevon.gov.uk/planning/planning-services/planning-development-management/viability-guidance-notes/viability-guidance-note-3-overage/> The East Devon Planning Obligations SPD, paragraph 6.22, also contains guidance on overage: <http://eastdevon.gov.uk/media/2140634/final-version-for-adoption.pdf>

<sup>44</sup> National Planning Policy Framework, paragraph 63:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/740441/National\\_Planning\\_Policy\\_Framework\\_web\\_accessible\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf)

### **How do we calculate the contribution towards off-site affordable housing?**

- 3.17 If the council agrees that it is appropriate for affordable housing to be provided off-site, then a financial contribution, known as a “commuted sum”, will be accepted instead. This payment is due after completion of units within the development, and will be secured through a legal agreement.
- 3.18 A commuted sum calculator works out the off-site financial payment.<sup>45</sup> This approach has been adopted by the council,<sup>46</sup> and applicants should use this calculator to demonstrate compliance with Local Plan Strategy 34.
- 3.19 The commuted sum is the difference in residual value<sup>47</sup> of a scheme made up entirely of market dwellings, compared to a scheme with a policy compliant level of affordable housing (or lower level where demonstrated by a viability assessment). The contribution varies according to the market area, and whether the affordable housing target is 25% or 50%. The commuted sum is worked out by multiplying the total number of dwellings (market and affordable) in the scheme, by the contribution per dwelling in the calculator.
- 3.20 The commuted sum calculator ensures that a developer will be no better or worse off financially, whether affordable housing is provided on-site or as a commuted sum. The calculator is periodically updated to reflect market changes – for the latest figures see the commuted sum calculator on the council’s website.<sup>48</sup>

### **Where and when does the money from off-site contributions get spent?**

- 3.21 The council will spend the money secured from off-site contributions – the “commuted sum” – on the delivery of affordable housing in East Devon. The legal agreement will impose a time limit of 10 years on the council, within which time the contribution must be spent. This time limit will begin from the date of the council receiving the commuted sum.
- 3.22 The council aspires to spend the commuted sum on the provision of affordable housing within the same parish from which the sum was received, in order to create mixed and

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<sup>45</sup> Further information on the commuted sum calculator can be seen on the council’s website:

<http://eastdevon.gov.uk/planning/planning-services/planning-development-management/unilateral-undertakings-section-106-agreements-habitat-mitigation-and-affordable-housing-contributions/commuted-sum-calculator-stage-1a/>

<sup>46</sup> Agenda for Development Management Committee, 3 June 2015, minutes of the Committee held on 21 April 2015: <http://eastdevon.gov.uk/media/1140473/030615-combined-dmc-agenda.pdf>

<sup>47</sup> Residual value is the difference between the total scheme revenue (from residential development) and the cost of delivering the scheme.

<sup>48</sup> The commuted sum calculator can be seen at: <http://eastdevon.gov.uk/planning/planning-services/planning-development-management/unilateral-undertakings-section-106-agreements-habitat-mitigation-and-affordable-housing-contributions/commuted-sum-calculator-stages-2-and-3/>

balanced communities. However, if this is not possible (e.g. if a suitable site cannot be found within a reasonable period of time), then the contribution will be spent elsewhere in East Devon. Generally, commuted sums are combined with right to buy receipts to purchase property to add to the council's social rented housing stock.

### **What is “vacant building credit” and how can it affect the affordable housing requirement?**

- 3.23 To support the re-use of brownfield land, national policy permits the reduction of affordable housing contributions where vacant buildings are being reused or redeveloped.<sup>49</sup> In such cases, the affordable housing requirement should be reduced by a proportionate amount, equivalent to the existing gross floor space of existing buildings. This is known as “vacant building credit” (VBC) and means that on-site affordable housing units and/or off-site financial contributions will be reduced as a result of applying the credit. Indeed, if the total floor space of existing buildings to be reused or redeveloped is equal to or exceeds the total floor space created, then no affordable housing would be required.
- 3.24 The vacant building credit applies where the building has not been abandoned. The floor space is measured as the gross internal area (GIA) – best practice for measuring GIA is set out by the Royal Institute of Chartered Surveyors.<sup>50</sup>
- 3.25 An applicant should make clear they are seeking to apply vacant building credit as part of their planning application, by following the steps below:
- a) Set out the ‘expected’ number of affordable dwellings for the site, before applying VBC (i.e. 25% or 50% of the total number of dwellings, depending upon the location)
  - b) Divide the existing floor space by proposed floor space, to work out what proportion the existing floor space is of the total combined floor space proposed
  - c) Apply a discount to the ‘expected’ affordable housing requirement, equivalent to the proportion of the scheme that is existing floor space
- 3.26 As an example, under step a) above, a proposal for 120 dwellings in Axminster would be expected to provide 30 affordable homes (25% of total). The existing floor space of a vacant building to be reused or redeveloped is 6,000 square metres, and the proposed floor space is 12,000 square metres. Therefore, step b) is 6,000 divided by 12,000, which equals 0.5 (or

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<sup>49</sup> National Planning Policy Framework, paragraph 63 and footnote 28:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/740441/National\\_Planning\\_Policy\\_Framework\\_web\\_accessible\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf)

<sup>50</sup> Code of Measuring Practice, Royal Institute of Chartered Surveyors: <https://www.rics.org/uk/upholding-professional-standards/sector-standards/real-estate/code-of-measuring-practice/>



50%). This results in the discount to be applied under step c) being 50%, making the affordable housing requirement 15 dwellings (rather than 30).

3.27 The application of these steps can be explained by the following calculation:

$$\text{AH} - ((\text{AH} \times \text{EFS}) / \text{PFS}) = \text{RAH}$$

- AH = expected number of affordable dwellings prior to application of VCB
- EFS = Existing floor space to be demolished in square metres
- PFS = Proposed floor space to be created in square metres
- RAH = Revised number of affordable dwellings

3.28 Effectively, vacant building credit results in an affordable housing requirement that is based on only the net increase in floor space. The revised requirement may result in a 'proportion' of an affordable dwelling being required – in these cases, the commuted sum calculator should be used to identify the financial contribution required from that 'proportion'.

3.29 Bearing in mind the intention of national policy to incentivise brownfield development, the council will consider not applying the credit where:

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

3.30 If a proposal benefits from vacant building credit, and then provides a policy compliant level of affordable housing for the remainder of the development, an overage clause will not be applied as the proposal is, in effect, consistent with policy targets.

## 4 Tenure and Mix

### What mix of affordable housing tenures should be provided?

- 4.1 Over the period of the Local Plan (2013 to 2031), the following affordable housing tenures are sought:
- 70% social or affordable rent
  - 30% intermediate or other affordable housing
- 4.2 These figures reflect long term affordable housing need in East Devon, as identified in the Strategic Housing Market Assessment,<sup>51</sup> but this tenure mix could vary in periods of depressed markets to reflect viability considerations and aid delivery. What constitutes a “depressed market” will need to be justified by the applicant, but could include a recession or similar significant economic changes, or particular areas where house prices or sales are falling. The council will require viability evidence from the applicant to justify an alternative tenure mix, along with evidence that there is a need for the proposed affordable housing product.
- 4.3 In terms of the 70% ‘social or affordable rent’, Social Rent is set at a level that takes into account local earnings and property values, typically set at around 50-60% of market rents; whilst Affordable Rent levels are set at a maximum of 80% of market rent.<sup>52</sup>
- 4.4 The 30% ‘intermediate or other affordable housing’ can comprise of:
- other affordable routes to home ownership (which include shared ownership, relevant equity loans, other low cost homes for sale, and rent to buy e.g. ‘Rentplus’)
  - discounted market sales housing
  - starter homes
- 4.5 The inclusion of some of these products within the definition of affordable housing (namely low cost market housing, starter homes, rent to buy) post-dates the Strategic Housing Market Assessment, so there is currently a lack of evidence regarding the need for these types of affordable housing in East Devon. Therefore, the councils’ priority is to deliver

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<sup>51</sup> Exeter Housing Market Area, Strategic Housing Market Assessment 2014/15, section 13.5:

<http://eastdevon.gov.uk/media/996504/exeter-shma-final-report-16-03-15.pdf>

<sup>52</sup> National figure, A new deal for social housing, MHCLG, August 2018, paragraph 2:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/733605/A\\_new\\_deal\\_for\\_social\\_housing\\_web\\_accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733605/A_new_deal_for_social_housing_web_accessible.pdf)

shared ownership, relevant equity loans, and other low cost homes for sale. Given the range of potential products, an applicant should provide evidence to justify the mix being proposed within the 30% 'intermediate or other housing'.

- 4.6 Discounted market sales housing and other low cost homes for sale should be priced at least 20% below local market values. In addition, starter homes should cost no more than £250,000, with Government guidance stating that starter homes are not expected to be priced significantly more than the average price paid by a first time buyer<sup>53</sup> – in East Devon, the average price paid by a first time buyer is currently £218,776.<sup>54</sup> As part of the overall affordable housing contribution on major development, the NPPF states that at least 10% of homes should be available for affordable home ownership, subject to certain exemptions.<sup>55</sup>
- 4.7 The 70/30 tenure split will not apply to exception sites (see [chapter 6](#)), where schemes will be informed by more localised housing needs evidence.

### **What size and type of affordable housing is sought in East Devon?**

- 4.8 Social and affordable rented housing need is primarily for properties that are 1-2 bedrooms in size, with the SHMA indicating 50% of need for 1 bedroom properties, and 40% for 2 bedrooms. The remaining 10% should be 3-4 bedrooms or more.<sup>56</sup> These long term forecasts of need are reflected in the latest Devon Home Choice monitoring report, which identifies just under 80% of need being for 1-2 bedroom properties for social and affordable rented housing – Exmouth has a particularly high need for this type of property.

**Figure 4.1: Bedroom need of households registered on Devon Home Choice (Bands A – D) in East Devon, January 2019<sup>57</sup>**

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<sup>53</sup> Planning Practice Guidance, Reference ID: 55-002-20150318: <https://www.gov.uk/guidance/starter-homes>

<sup>54</sup> UK House Price Index, Land Registry, December 2018:

<http://landregistry.data.gov.uk/app/ukhpi/browse?from=2018-01-01&location=http%3A%2F%2Flandregistry.data.gov.uk%2Fid%2Fregion%2F-east-devon&to=2019-01-01>

<sup>55</sup> National Planning Policy Framework, paragraph 64:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/740441/National\\_Planning\\_Policy\\_Framework\\_web\\_accessible\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf)

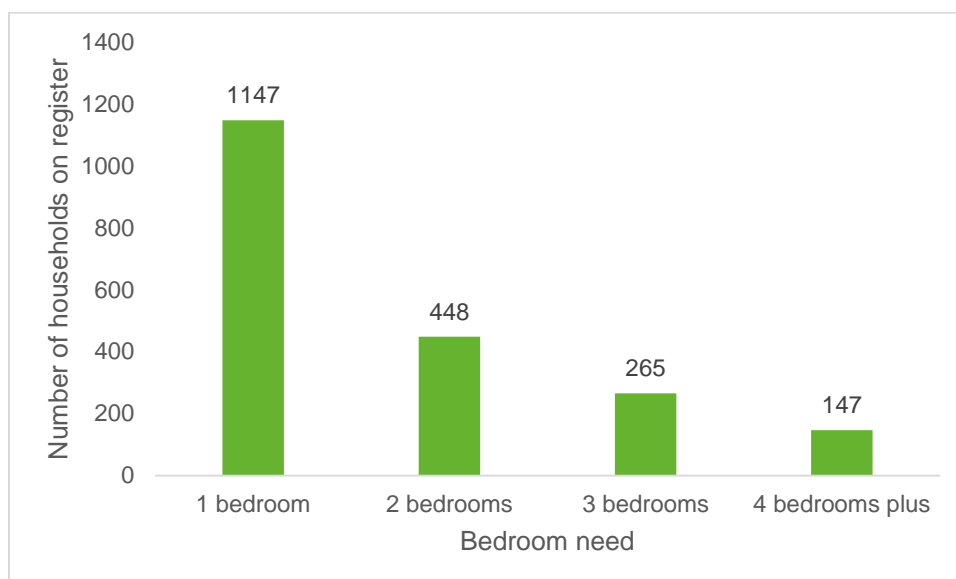
<sup>56</sup> Exeter Housing Market Area, Strategic Housing Market Assessment 2014/15, Table 13-1:

<http://eastdevon.gov.uk/media/996504/exeter-shma-final-report-16-03-15.pdf>

<sup>57</sup> Devon Home Choice Quarterly Monitoring Report, January 2019:

[https://www.devonhomechoice.com/sites/default/files/DHC/dhc\\_monitoring\\_report\\_-\\_jan\\_2019.pdf](https://www.devonhomechoice.com/sites/default/files/DHC/dhc_monitoring_report_-_jan_2019.pdf)





- 4.9 The property size requirements for intermediate or other affordable housing is also focussed on mainly 1-2 bedroom units, to meet the needs of concealed households forming and unable to access the market sector as a first time buyer. There is less need for three bedroom homes. The overall property sizes required for intermediate or other affordable housing is the same as for social and rented i.e. 50% one bedroom, 40% two bedroom and 10% for three bedrooms.<sup>58</sup>
- 4.10 Specific needs evidence may be available in rural areas where a housing needs study has been produced.

#### **Is it possible to purchase extra shares of a shared ownership affordable dwelling?**

- 4.11 Shared ownership offers affordable homes for sale that are partly owned and partly rented by the occupier. Shares of between 25% and 75% of the market value can be purchased, with a subsidised rent to be paid on the remaining share. Additional shares can be bought by occupiers of shared ownership dwellings, in a process known as “staircasing”.
- 4.12 It is important to note that rural parts of East Devon are within a ‘Designated Protected Area’ (DPA) where there are restrictions on the proportion of shares that can be purchased.<sup>59</sup> In these cases, either staircasing is restricted to no more than an 80% share of the property; or

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<sup>58</sup> Exeter Housing Market Area, Strategic Housing Market Assessment 2014/15, section 13.7:

<http://eastdevon.gov.uk/media/996504/exeter-shma-final-report-16-03-15.pdf>

<sup>59</sup> Areas outside the towns of Axminster, Budleigh Salterton, Exmouth, Honiton, Ottery St Mary, Sidmouth and a small part of Broadclyst adjacent to Exeter are within the DPA. The Designated Protected Areas are set out in a Government Order: [http://www.legislation.gov.uk/ukxi/2009/2098/pdfs/ukxi\\_20092098\\_en.pdf](http://www.legislation.gov.uk/ukxi/2009/2098/pdfs/ukxi_20092098_en.pdf)

in instances where the occupier can purchase more than an 80% (i.e. up to full ownership) share, then there is an obligation on the landlord to repurchase the property when the occupier wishes to sell. These areas are set by the Government with the intention of retaining shared ownership houses in locations where they would be difficult to replace.<sup>60</sup>

- 4.13 For grant-funded shared ownership dwellings within a DPA, EDDC can apply to the Government (Homes England) to remove these restrictions on staircasing (known as a “waiver”), under certain conditions. The Government recognise that retaining shared ownership dwellings is not an issue in some parts of DPAs, such as planned urban extensions, new towns, and suburban sites.<sup>61</sup> For example, the shared ownership dwellings in phase one of Cranbrook have been “waivered” by the Government.



Shared ownership affordable homes in Cranbrook

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<sup>60</sup> Designated Protected Areas explanatory note, HCA, December 2016:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/582207/DPA\\_explanatory\\_note.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/582207/DPA_explanatory_note.pdf)

<sup>61</sup> Designated Protected Area waiver form, HCA:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/530061/2016.06.17\\_-\\_DPA\\_waiver\\_form.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/530061/2016.06.17_-_DPA_waiver_form.pdf)

- 4.14 For non-grant funded shared ownership dwellings in DPAs, Registered Providers are able to apply to EDDC to remove the restrictions on staircasing.<sup>62</sup> The council will lift the restrictions where evidence shows there is either a surplus of shared ownership units, that they can be easily replaced, or that the restriction is making the shared ownership unit(s) unaffordable to potential occupants due to high interest rates or high deposits required by lenders. Where a waiver is given, the s.106 agreement will be amended so that staircasing receipts are recycled for the provision of affordable housing East Devon.

### **Can self-build and custom-build housing be considered affordable housing?**

- 4.15 Self-build and custom-build housing is built by an individual, a group of individuals or persons working with or for them, to be occupied by that individual.<sup>63</sup> Such housing will typically not be considered “affordable housing,” unless it meets the [definition in national policy](#) (see chapter 2).
- 4.16 The Local Plan does not treat self-build and custom-build differently to any other form of housing, and proposals for self-build and custom-build housing should be consistent with Local Plan policies on affordable housing, particularly Strategy 34 and 35. It may be that self-builders are able to work with a registered provider or Community Land Trust to deliver the affordable self/custom build housing.

### **How can affordable sheltered housing be delivered?**

- 4.17 Sheltered housing refers to properties where some form of support worker service is provided on a regular basis, but where no registered personal care is provided. It is usually only available to people aged 55 and over, or those with a support need. In most cases, schemes will also include traditional shared facilities such as a residents’ lounge, garden and/or laundry. Most sheltered housing for rent is provided by the council and registered providers, whilst private developers offer the majority of sheltered housing for sale.
- 4.18 Assuming it is a C3 use, proposals for new sheltered housing should provide affordable housing consistent with policies in the Local Plan. This means that affordable sheltered housing should be provided on-site above the set thresholds, meeting the relevant target (25% or 50%) depending upon the location. Off-site contributions may also be acceptable. Therefore, affordable sheltered housing should normally be delivered alongside ‘market’ sheltered housing, and operated by a developer, registered provider or the council.

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<sup>62</sup> This approach is set out in the EDDC Cabinet report, June 2014 (item 19):

<http://eastdevon.gov.uk/media/131741/cabinet-040614-public-version.pdf> and minutes (item 17):

<http://eastdevon.gov.uk/media/1465787/cabinet-mins-040614.pdf>

<sup>63</sup> Further information can be seen on council’s website: <http://eastdevon.gov.uk/planning/planning-policy/housing-issues/self-build-and-custom-build/> and the Self build portal: <https://selfbuildportal.org.uk/>



- 4.19 The older age profile in East Devon makes it important to deliver affordable sheltered housing, particularly given the ageing population is forecast to grow. The movement of older people who are living in (under-occupied) affordable housing into sheltered housing will also release affordable housing stock for families in need.<sup>64</sup> The Devon Home Choice quarterly monitoring report includes information on the number of bids for sheltered homes to rent by property type, indicating a continued need for this type of affordable accommodation.<sup>65</sup>

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<sup>64</sup> Exeter Housing Market Area, Strategic Housing Market Assessment 2014/15, para 12.6.8:

<http://eastdevon.gov.uk/media/996504/exeter-shma-final-report-16-03-15.pdf>

<sup>65</sup> Devon Home Choice Quarterly Monitoring Reports: [https://www.devonhomechoice.com/useful-information-0#Monitoring\\_reports](https://www.devonhomechoice.com/useful-information-0#Monitoring_reports)

## 5 Design and Layout

### How can affordable housing be well-designed?

- 5.1 The NPPF articulates the importance of achieving well-designed places in making clear that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve, referring to the use of Building for Life to assess and improve the design of development.<sup>66</sup> Local Plan policy D1 requires high quality, locally distinctive design that respects the key characteristics and special qualities of the area, with buildings that are well-related to their context.
- 5.2 The design of affordable housing should therefore be consistent with these national and local planning policies. New homes and streets should be “tenure-blind,” meaning that market and affordable dwellings cannot be distinguished from each other in terms of design, build quality, appearance, materials and site location.



“Tenure blind” market and affordable dwellings in Ottery St Mary

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<sup>66</sup> National Planning Policy Framework, paragraph 124, 129:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/740441/National\\_Planning\\_Policy\\_Framework\\_web\\_accessible\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf)

- 5.3 Where it is intended that a registered provider (RP) will take on responsibility for the affordable housing, these bodies should be engaged at an early stage to ensure that their design and layout requirements can be met. For example, management requirements within flatted development means that social or affordable rented dwellings should have separate floors, entrances or blocks to open market units.
- 5.4 It should be noted that a Design Guide supplementary planning document is currently being prepared by the council, which will provide further detail on the design of new housing.



Meadow Haze, Woodbury, a scheme of 20 dwellings (12 market, 8 affordable) which was runner up at the Devon Affordable Housing Awards 2018

### **How should affordable housing be ‘pepper-potted’ or dispersed throughout a development?**

- 5.5 Local Plan Strategy 34 states that “*on any development site affordable housing should be ‘pepper potted’ or dispersed throughout the scheme*”. The distribution of affordable housing throughout a development promotes social cohesion, creating a mixed and balanced community.
- 5.6 Pepper potting or dispersal of affordable housing can take place in clusters, which are defined as groups of dwellings that have adjacent side boundaries, share the same road frontage, and are located directly opposite each other.

- 5.7 Affordable housing should generally be provided in clusters of no more than 10 dwellings, unless the applicant can justify that greater than 10 dwellings is necessary, and can still be delivered in a manner that promotes social cohesion and creates a mixed and balanced community. On larger sites it is likely that clusters will be up to 10 dwellings; whilst on smaller scale sites, clusters should be commensurately smaller. The affordable housing within each cluster should include a mix of tenures.
- 5.8 The following diagrams (figures 5.1-2) provide illustrative examples of acceptable and poor dispersal of affordable housing.

**Figure 5.1: Illustrative example of acceptable dispersal of affordable housing throughout a development**



**Figure 5.2: Illustrative example of poor dispersal of affordable housing throughout a development**





- 5.9 It is acknowledged that exception sites (which could be entirely affordable housing) can be up to or around 15 dwellings, so may involve a cluster greater than 10 dwellings. Nevertheless, affordable housing on exception sites should still be dispersed where physically possible.

**Are there any design standards that affordable housing should meet?**

- 5.10 The Local Plan (Strategy 36) makes clear that on developments of 10 dwellings or more, all of the affordable housing should meet part M4(2) of the Building Regulations relating to accessible and adaptable dwellings, unless viability evidence indicates it is not possible.

The Building Regulations contain detail on how to achieve this standard.<sup>67</sup> There are several, wide ranging benefits to making homes accessible and adaptable, such as:

- Meeting the needs of an ageing population
- Meeting the housing need of people with disabilities
- Reduction in care costs by allowing people to remain at home
- Limited/nil costs necessary to adapt an existing home
- Providing flexible living arrangements to suit changing needs
- Providing an option for elderly residents to move out of family homes, freeing up such homes for younger people

- 5.11 National policy allows the use of a minimum internal space standard for new dwellings, where a need can be justified. There are no space standards in the East Devon Local Plan 2013-2031,<sup>68</sup> but dwelling size is seen as an important issue for design quality, and to avoid overcrowding in affordable homes.<sup>69</sup>

#### **At what stage in the development should on-site affordable housing be delivered?**

- 5.12 In order to foster social cohesion and a mixed and balanced community from the outset, on-site affordable housing should be delivered alongside market dwellings. Therefore, unless it is not feasible or viable, for schemes of 20 or more dwellings:
- No more than 50% of open market dwellings should be occupied prior to completion of 50% of the affordable homes
  - No more than 75% of open market dwellings should be occupied prior to completion of 100% of the affordable homes
- 5.13 The design and layout of the site should ensure that affordable housing can be delivered alongside the market dwellings, in line with the above phasing.

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<sup>67</sup> The Building Regulations 2010, Approved Document M, Volume 1: Dwellings:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/540330/BR\\_PDF\\_AD\\_M1\\_2015\\_wit\\_h\\_2016\\_amendments\\_V3.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/540330/BR_PDF_AD_M1_2015_wit_h_2016_amendments_V3.pdf)

<sup>68</sup> The Cranbrook Plan Submission Draft includes a policy requiring new dwellings to meet the Nationally Described Space Standards, but this is subject to Examination before it can be adopted.

<sup>69</sup> For example, the Government consider house size when assessing bids for affordable housing funding, by benchmarking against the Nationally Described Space Standards, as detailed in Shared Ownership and Affordable Home Ownership supplementary information: <https://www.gov.uk/government/publications/shared-ownership-and-affordable-home-ownership-supplementary-information>

## 6 Rural Exception Sites

### What are rural exception sites?

- 6.1 The Local Plan (Strategy 35) allows exception sites for mixed affordable and open market housing schemes at villages, small towns and outside Built-up Area Boundaries, where residential development would not normally be acceptable. These are commonly known as “rural exception sites.” Up to or around 15 dwellings will be allowed on such sites, where justified by local housing needs. At least 66% of the housing should be affordable – for example, a scheme of 10 dwellings should provide at least seven affordable homes, as six would be below the policy requirement.

### What evidence on housing needs is required to justify a rural exception site?

- 6.2 Local Plan Strategy 35 makes clear that “*a proven local need demonstrated through an up to date robust housing needs survey*” will be required to justify a rural exception site, along with evidence that affordable housing need in any given locality would not otherwise be met.
- 6.3 A “robust housing needs survey” should have either been produced by rural housing enablers at Devon Communities Together,<sup>70</sup> or followed their methodology and undertaken in partnership with the parish council and/or neighbourhood plan steering group.<sup>71</sup> The survey will gather factual information on the scale and nature of housing need at a local level. This will give an indication on the number, type and tenure of affordable homes that are needed by those that have a local connection to the parish or parish grouping.<sup>72</sup>
- 6.4 Housing need surveys represent a snapshot in time, and will become out of date as housing circumstances change. Therefore, an “up to date” housing needs survey is one that has been completed within the last five years; unless there has been significant development of affordable housing subject to a local connection within this period, in which case an update of the survey is likely to be necessary.
- 6.5 Evidence on the tenure of affordable housing in the needs survey at the small town or village may be different to the 70/30 social or affordable rent/intermediate or other affordable

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<sup>70</sup> Devon Communities Together, Rural Housing services: <https://www.devoncommunities.org.uk/services/rural-housing>

<sup>71</sup> See further guidance on ‘Producing robust and influential rural housing needs surveys’:

<http://www.acre.org.uk/cms/resources/rhe-surveys-principles-and-guidance.pdf>

<sup>72</sup> East Devon Local Plan 2013 – 2031, paragraph 16.29, sets out the grouping of parishes for assessing housing need: <http://eastdevon.gov.uk/media/1772841/local-plan-final-adopted-plan-2016.pdf>

housing split in the Local Plan (Strategy 34). In these cases, the findings from the housing needs survey will supersede the tenure requirements in Strategy 34.



Six affordable homes on a rural exception site in Dalwood, delivered by Corry Valley Community Land Trust

### **What is the process for producing a Rural Housing Needs Survey?**

- 6.6 EDDC work in partnership with rural housing enablers at Devon Communities Together (DCT) on rural housing needs. The council fund DCT to carry out three housing needs surveys each year, often as the result of an approach by a town/parish council, Community Land Trust, or through the planning process. Landowners, developers and agents can also commission DCT to undertake such surveys.
- 6.7 When instructed, rural housing enablers at DCT will initiate the survey by attending a town/parish council meeting to explain the survey, which the council should then agree at a subsequent meeting – if the town/parish council is not supportive, DCT will not progress the survey.
- 6.8 The surveys will then be hand delivered or posted by the town/parish council, with a reply paid envelope for DCT. The responses are collated and analysed by DCT, who prepare a report on the number of households in need based on their finances and local connection. This report focusses on affordable housing need, but also covers market need for residents of the parish. The report of the findings is presented at a subsequent town/parish council meeting. DCT will also produce an options appraisal that will set out the next steps for the town/parish council to deliver the identified need; such as through a Community Land Trust, partnering with a Registered Provider, or working with a developer.
- 6.9 Altogether, a rural housing needs survey will likely take 3 – 4 months to produce.



## Where can rural exception sites be built?

- 6.10 In accordance with Local Plan Strategy 35, rural exception sites will only be considered at small towns or villages that have a population of below 3,000 people. There are eight settlements in East Devon with more than 3,000 people – Exmouth, Sidmouth, Honiton, Seaton, Axminster, Budleigh Salterton, Ottery St Mary and Cranbrook – so the potential for rural exception sites in these settlements can immediately be ruled out. There is an expectation that, in proposing a rural exception site, applicants will have worked closely with the parish council prior to submission of a planning application.
- 6.11 At small towns and villages with a Built-up Area Boundary (BUAB), rural exception sites must abut or be “*physically closely related to that boundary*”. There are 15 villages with a BUAB identified in the East Devon Villages Plan.<sup>73</sup> Neighbourhood plans may also identify BUABs. For those villages without a BUAB, the site should be “*physically very well-related to the built form of the village*”.
- 6.12 Whether a site is *physically closely* or *very well-related* to the boundary/built form will be considered on a case-by-case basis, depending upon the characteristics of the village in question. In general terms, the built form will be a group of buildings and associated land (e.g. residential gardens) that together take the physical form of a settlement – outlying land and buildings are not likely to be part of the built form. To be closely or very well-related, a site should either be adjacent to the built form or otherwise shown by the applicant to be closely or very well related to the village.
- 6.13 The rural exception site should also be close to a range of community services and facilities, meaning at least four of the following:
- School
  - Pub
  - Village hall
  - Shop/post office
  - Doctors surgery
  - Place of worship
  - Public transport service

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<sup>73</sup> East Devon Villages Plan: <http://eastdevon.gov.uk/media/2558248/edvp-adopted-version.pdf>

- 6.14 “Close” should mean that these services and facilities can be reasonably accessed by walking or cycling, in order to minimise the need to travel by car on a day-to-day basis.<sup>74</sup>



Rural exception site in Colyton

### Who can live in an affordable dwelling at a rural exception site?

- 6.15 The first and subsequent occupancy of affordable housing on a rural exception site is restricted to those who:
- do not have access to general market housing (i.e. in housing need); and
  - is a resident of that parish group<sup>75</sup> or has a local connection due to family ties or a need to be near their place of work.
- 6.16 To be considered in *housing need* for affordable housing to rent, an occupant will need to be registered with Devon Home Choice and then placed within bands A – E. For shared ownership or equity loan schemes, an occupant should be registered on Help to Buy South

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<sup>74</sup> There is no current national policy or guidance that specifies walking distances, but previous Government policy in Planning Practice Guidance 13: Transport stated that “walking offers the greatest potential to replace short car trips, particularly those under 2km”.

<sup>75</sup> Parish groups are defined in the Local Plan 2013-2031, paragraph 16.29:  
<http://eastdevon.gov.uk/media/1772841/local-plan-final-adopted-plan-2016.pdf>

West, the Government appointed local help to buy agency which provides a one stop shop for households seeking all forms of low cost home ownership. Eligibility to purchase starter homes and other discounted market sales housing will be based upon household income, age (under 40 for starter homes), and whether the proposed occupant is a first time buyer (starter homes).

- 6.17 The restrictions on residency and local connection, along with the evidence required to demonstrate compliance with these restrictions, are shown in figure 6 below. Further detail is given in the standard section 106 agreement for affordable housing in [appendix three](#). For social and affordable rented dwellings, Devon Home Choice undertake these checks on behalf of the council.

**Figure 6.1: Local connection requirements to occupy affordable housing on a Rural Exception Site**

Local connection to the parish or parish grouping (in order of priority)	Examples of evidence to demonstrate local connection
i) Persons who have been permanently resident therein for a continuous period of three years out of the five years immediately prior to the affordable dwelling being offered to them; or	Proof of address history such as utility bills, mobile phone bills, council tax bills, bank/credit card statements
ii) Being formerly permanently a resident therein for a continuous period of five years at some time in the past	Proof of address history such as utility bills, mobile phone bills, council tax bills, bank/credit card statements
iii) Having his or her place of permanent work (normally regarded as 16 hours or more a week and not including seasonal employment) therein for a continuous period of at least 12 months immediately prior to being offered the affordable dwelling; or	Pay slips and/or written confirmation from employer
iv) Persons who can demonstrate a close family connection to the District in that their person's mother, father, son, daughter or sibling has been permanently resident therein for a continuous period of five years immediately prior to the affordable dwelling being offered to them and where there is independent evidence of a caring dependency relationship	Proof of address history from close family, such as utility bills, mobile phone bills, council tax bills, bank/credit card statements  Independent evidence of a caring dependency

- 6.18 Further detail on who can live in affordable housing on other (non-exception) sites can be seen in [chapter 7](#).

### **What if the rural exception site is not viable?**

- 6.19 Local Plan policy (Strategy 35) does not allow viability to be considered on rural exception sites. The purpose of allowing up to 34% market housing on rural exception sites is to provide a cross-subsidy that enables such sites to be viable. The cost of land, in particular, should be low on rural exception sites. Therefore, viability cannot be used to justify the delivery of less than 66% affordable housing on a rural exception site.<sup>76</sup>

### **Who will manage rural exception site affordable housing?**

- 6.20 In the majority of cases, rural exception site affordable housing to rent will be purchased and then leased out and managed by a Registered Provider (RP). However, the small-scale nature and/or remote location of some exception sites mean that it can sometimes be difficult to secure an RP where only a few affordable homes are being delivered, as such sites lack the economies of scale to be managed by the RP in a viable manner.
- 6.21 Community land trusts (CLTs) can also deliver rural exception site affordable housing, and then lease the homes to an RP to manage.
- 6.22 Alternatively, it may be possible to pass properties on to the council to manage alongside its existing rented stock.
- 6.23 Rural exception site affordable housing to buy may also be subject to management conditions; for example, shared ownership homes will involve the purchaser buying shares worth between 25% and 75% of the property's value, with a subsidised rent to an RP or sometimes private developer being paid on the remaining element.

### **How do rural exception sites differ from entry-level exception sites?**

- 6.24 As described in [paragraph 2.16](#), entry-level exception sites provide homes suitable for first time buyers or those looking to rent their first home, on land not already allocated for housing. They were introduced by the Government in the National Planning Policy Framework (NPPF), revised in 2018<sup>77</sup> – as the Local Plan was adopted prior to this revision, it does not mention such sites. Therefore, proposals for entry-level exception sites will be

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<sup>76</sup> Further guidance on viability and exception sites has been published by the council:  
<http://eastdevon.gov.uk/planning/planning-services/planning-development-management/viability-guidance-notes/viability-guidance-note-5-viability-and-exception-sites/>

<sup>77</sup> National Planning Policy Framework, paragraph 71:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/740441/National\\_Planning\\_Policy\\_Framework\\_web\\_accessible\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf)



judged against existing policies in the Local Plan, with the NPPF being a material consideration.<sup>78</sup>

- 6.25 There are several key differences between rural exception sites and entry-level exception sites, illustrated in the table below (figure 6.2).

**Figure 6.2: Key differences between rural exception sites and entry-level exception sites**

<i><b>Issue</b></i>	<b>Rural exception site</b>	<b>Entry-level exception site</b>
<i>Affordable housing proportion</i>	At least 66%	100%
<i>Affordable housing type</i>	Justified by up to date robust housing needs survey	Suitable for first time buyers or those looking to rent their first home
<i>Site size</i>	Up to or around 15 dwellings	No larger than one hectare in size or exceed 5% of the size of the existing settlement
<i>Location</i>	In settlements with a population of 3,000 people or less, close to a range of community services and facilities. Sites must abut or be physically closely related to a Built-up Area Boundary, or physically very well related to built form of village (where no such boundary exists)	Adjacent to existing settlements, but not within an Area of Outstanding Natural Beauty

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<sup>78</sup> Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

## 7 Pre-application, Legal agreements, and Occupancy

### **What should an applicant discuss with the council at pre-application stage?**

- 7.1 As advised in the Planning Obligations SPD, it is extremely important that developers enter into pre-application discussion with the councils' Development Management team at an early stage.<sup>79</sup>
- 7.2 As a minimum, pre-application discussions should cover the following affordable housing issues, to ensure consistency with the Local Plan and this SPD:
- Proposed number of affordable dwellings
  - Legal agreement to secure the affordable dwellings
  - Viability issues if proposing less affordable housing than the policy requirement
  - Tenure
  - Type
  - Design
  - Layout
  - Phasing of affordable housing delivery
  - Engagement with potential Registered Providers (including EDDC)

### **How is the delivery of affordable housing legally secured?**

- 7.3 A planning obligation, entered into as part of the planning application, will ensure that the delivery of affordable housing is legally secured. Planning obligations can be secured through either a section 106 agreement, or a unilateral undertaking.
- 7.4 A section 106 agreement should be used to secure the provision of on-site affordable housing. This will set out how much affordable housing will be provided, the tenure, type, and who can be considered as occupants of the housing. Planning applications should be accompanied by Heads of Terms for the section 106 agreement, which outline details of the proposed affordable housing being delivered in the scheme. The council has prepared a standard section 106 agreement for securing affordable housing (see [appendix three](#)) – this may be negotiable and can be adapted to suit site-specific circumstances.

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<sup>79</sup> East Devon Planning Obligations Supplementary Planning Document, paragraph 5.1:  
<http://eastdevon.gov.uk/media/2140634/final-version-for-adoption.pdf>

- 7.5 A unilateral undertaking is used for proposals where a financial contribution towards affordable housing is being provided. In these cases, the completed unilateral undertaking securing payment of the contribution must be provided with the planning application at the point of submission. The financial contribution itself should be paid after completion of units within the development.
- 7.6 For both section 106 agreements and unilateral undertakings, a fee is payable to the council to cover the costs in registering and assessing the agreement.

### **Who can live in an affordable dwelling?**

- 7.7 Affordable homes for social and affordable rent from the council or a registered provider are allocated to occupants through Devon Home Choice, a choice based lettings scheme.<sup>80</sup> Potential occupants need to register with Devon Home Choice, and are then assessed and placed into one of five priority bands:
- Band A – Emergency housing need
  - Band B – High housing need
  - Band C – Medium housing need
  - Band D – Low housing need
  - Band E – No housing need
- 7.8 Applicants who have no local connection to Devon will be placed in either band D (if they are assessed as having a high, medium or low housing need) or band E (if they are assessed as having no housing need).<sup>81</sup> To demonstrate a local connection with Devon, applicants will normally be resident in Devon, work in Devon, or have family connections in Devon – further detail is contained within Devon Home Choice policy, including exceptions.<sup>82</sup>
- 7.9 Once registered, an applicant can then 'bid' to live in properties that match their household needs. An occupant is chosen according to the band they have been placed in, and how long they have been waiting for a property.
- 7.10 Due to the high demand for affordable housing and limited supply to meet local housing needs, local connection criteria to the parish in which the affordable housing is located will be applied, in the following priority order:

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<sup>80</sup> Further information can be seen on the Devon Home Choice website: <https://www.devonhomechoice.com/>

<sup>81</sup> Devon Home Choice Policy Document, paragraph 3.9.1:  
<https://www.devonhomechoice.com/sites/default/files/DHC/dhcpolicyv73effectivefromjuly2018.pdf>

<sup>82</sup> Devon Home Choice Policy Document, paragraph 3.9.5:  
<https://www.devonhomechoice.com/sites/default/files/DHC/dhcpolicyv73effectivefromjuly2018.pdf>

- i. Being permanently resident therein for a continuous period of at least six months out of the last 12 months or for a continuous period of three years out of the last five years immediately prior to being offered the Affordable Housing unit
- ii. Being formerly permanently resident therein for a continuous period of five years; or
- iii. Having his or her place of permanent work (normally regarded as 16 hours or more a week and not including seasonal employment) therein immediately prior to being offered the Affordable Housing unit; or
- iv. Having a connection through a close family member (normally mother, father, brother, sister, son or daughter) where the family member is currently resident therein and has been so for a continuous period of at least five years immediately prior to being offered the Affordable Housing unit

7.11 In the event that no-one satisfying the above criteria can be found within the parish where the affordable housing is being provided, the above process will be repeated considering persons from the following areas, in the following priority order:

- i. Neighbouring parishes
- ii. Elsewhere in East Devon
- iii. At strategic sites in the “West End”: those with a connection to Exeter<sup>83</sup>
- iv. For sites elsewhere in East Devon: those with a connection to the county of Devon
- v. Those with a connection to adjoining districts outside Devon

7.12 Applicants will require the prior written permission of East Devon District Council for sites located in areas covered by points iii, iv and v above.

7.13 For shared ownership, equity loans, discounted market sales housing, and rent to buy, potential occupants must apply to Help to Buy South West, who will check their eligibility to be registered.<sup>84</sup> A series of criteria are considered on whether to accept potential occupants on to the register, principally being those who are unable to afford to purchase a home suitable for their needs on the open market. Once accepted on the register, prospective occupants can search for properties through the Help to Buy South West website. Again, properties will be allocated to meet local needs in the priority order above (paragraph 7.10-11).

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<sup>83</sup> Defined as the administrative area covered by Exeter City Council.

<sup>84</sup> Further information can be seen on the Help to Buy South West website: <https://www.helptobuysw.org.uk/>



- 7.14 Starter homes are available to first time buyers who are under the age of 40 at the time of purchase, with a total household annual income of no more than £80,000.<sup>85</sup>
- 7.15 As [previously explained](#) in chapter 6, Local Plan policy requires a “local connection” to a parish or parish grouping to occupy affordable homes at exception sites.

### **How long will an affordable dwelling remain “affordable”?**

- 7.16 The length of time that a home will remain “affordable” will depend upon the type of affordable dwelling. Any restrictions required to ensure the dwelling remains affordable into the future will be specified in a section 106 agreement.
- 7.17 For affordable housing to rent and discounted market sales housing, provisions should be in place to ensure housing remains at a discount for future eligible households. Where public grant funding has been provided to deliver other affordable routes to home ownership (including shared ownership, equity loans, rent to buy), homes should remain affordable for future eligible households, or receipts recycled for alternative affordable housing provision, or refunded to the Government or council.
- 7.18 Where possible (i.e. allowed in the NPPF definition of affordable housing), the homes will be subject to a perpetuity restriction in the section 106 meaning the homes will remain affordable for a period of at least 80 years.
- 7.19 The Government propose that starter homes will remain “affordable” (i.e. not sold at full market value) for a period of 15 years following its initial sale, although this has yet to be confirmed through regulations.<sup>86</sup>

### **Which Registered Providers are currently operating in East Devon?**

- 7.20 There are 14 Registered Providers that are currently operating in East Devon, listed below. The council is open to new providers working in the district, and would be happy to hold discussions with any prospective registered providers.

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<sup>85</sup> The household income figure is draft and subject to potential change, set out in the draft Community Infrastructure Levy Regulations:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/767292/CIL\\_Amendment\\_Regulations\\_Consultation\\_Paper.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/767292/CIL_Amendment_Regulations_Consultation_Paper.pdf)

<sup>86</sup> Government response to technical consultation on starter homes regulations, February 2017, paragraph 15:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/589806/Government\\_response\\_to\\_the\\_starter\\_homes\\_technical\\_consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/589806/Government_response_to_the_starter_homes_technical_consultation.pdf)

**Figure 7.1: Registered Providers currently operating in East Devon**

<b>Registered Provider<sup>87</sup></b>	<b>Website</b>
LiveWest	<a href="https://www.livewest.co.uk/">https://www.livewest.co.uk/</a>
Aster	<a href="https://www.aster.co.uk/">https://www.aster.co.uk/</a>
Yarlington Housing Group	<a href="https://www.yhg.co.uk/">https://www.yhg.co.uk/</a>
Sovereign	<a href="https://www.sovereign.org.uk/#">https://www.sovereign.org.uk/#</a>
Guinness Trust Housing Association	<a href="http://www.guinnesspartnership.com/">http://www.guinnesspartnership.com/</a>
Cornerstone	<a href="https://www.cornerstonehousing.net/">https://www.cornerstonehousing.net/</a>
Teign Housing	<a href="https://www.teignhousing.co.uk/">https://www.teignhousing.co.uk/</a>
Heylo Housing	<a href="http://heylohousing.com/">http://heylohousing.com/</a>
Sage Housing	<a href="https://www.sagehousing.co.uk/">https://www.sagehousing.co.uk/</a>
Hastoe Housing Association	<a href="http://www.hastoe.com/custom/1/homepage/default.aspx">http://www.hastoe.com/custom/1/homepage/default.aspx</a>
South Devon Rural Housing Association Limited	<a href="https://southdevonrural.co.uk/">https://southdevonrural.co.uk/</a>
South Western Housing Society	<a href="https://www.swhs.org.uk/">https://www.swhs.org.uk/</a>
Rural Homes Ltd	<a href="https://www.rural-homes.co.uk/">https://www.rural-homes.co.uk/</a>
East Devon District Council	<a href="http://eastdevon.gov.uk/">http://eastdevon.gov.uk/</a>

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<sup>87</sup> Rural specialists who have worked with community land trusts and in rural areas include: Hastoe Housing Association, South Devon Rural Housing Association Limited, South Western Housing Society and Rural Homes Ltd.

## Appendices

### Appendix One – Maps showing affordable housing thresholds<sup>88</sup>

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<sup>88</sup> The maps of Exmouth and Sidmouth show the area up to the mean low water mark (the jurisdiction covered by East Devon District Council), which includes areas out at sea.

1:210,325

Legend:

- 6-9 dwellings: no affordable housing on-site; financial contribution towards off-site affordable housing
- 10 dwellings or more and/or site area of 0.5ha or more: on-site affordable housing

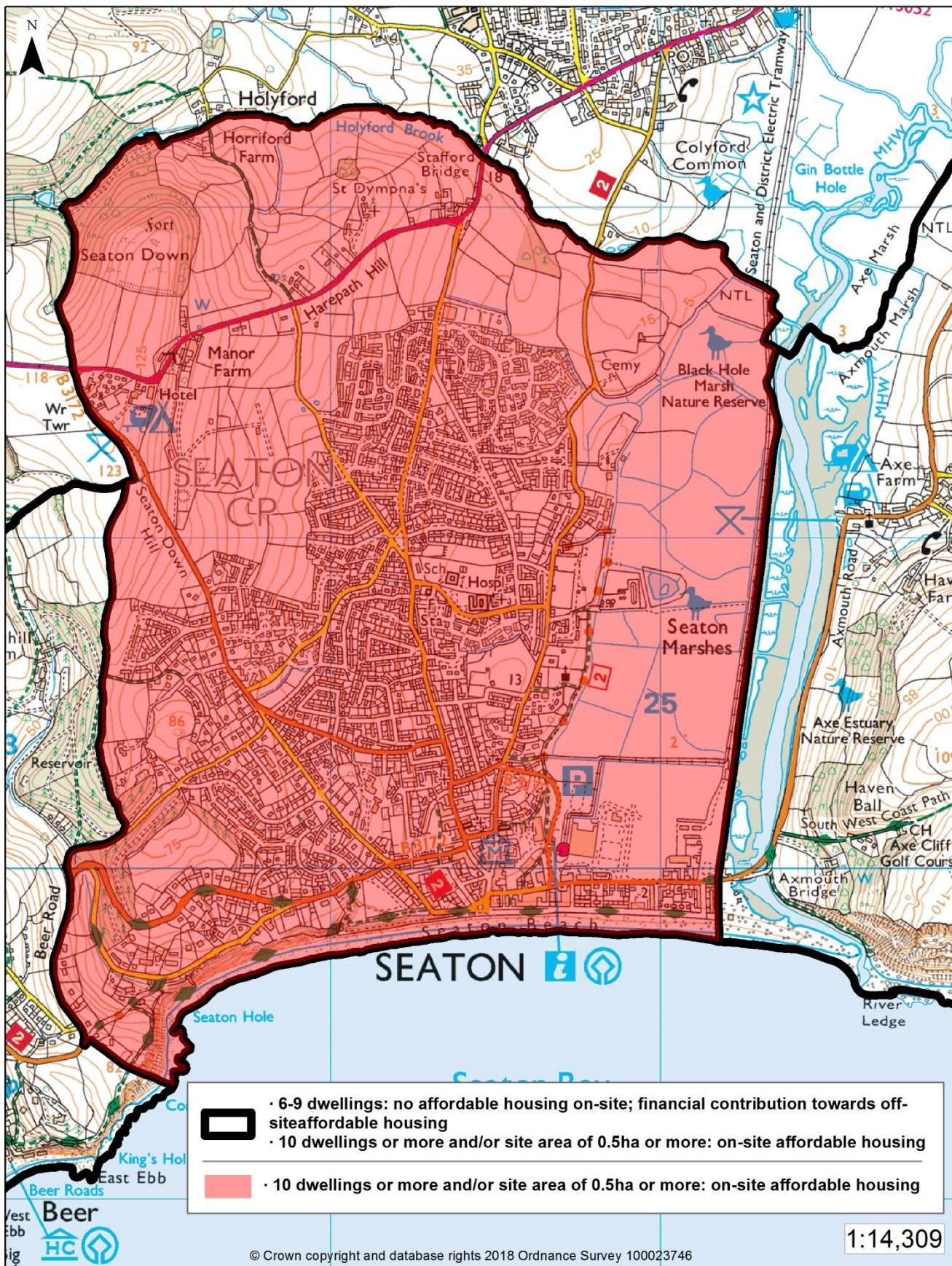


[illegible]



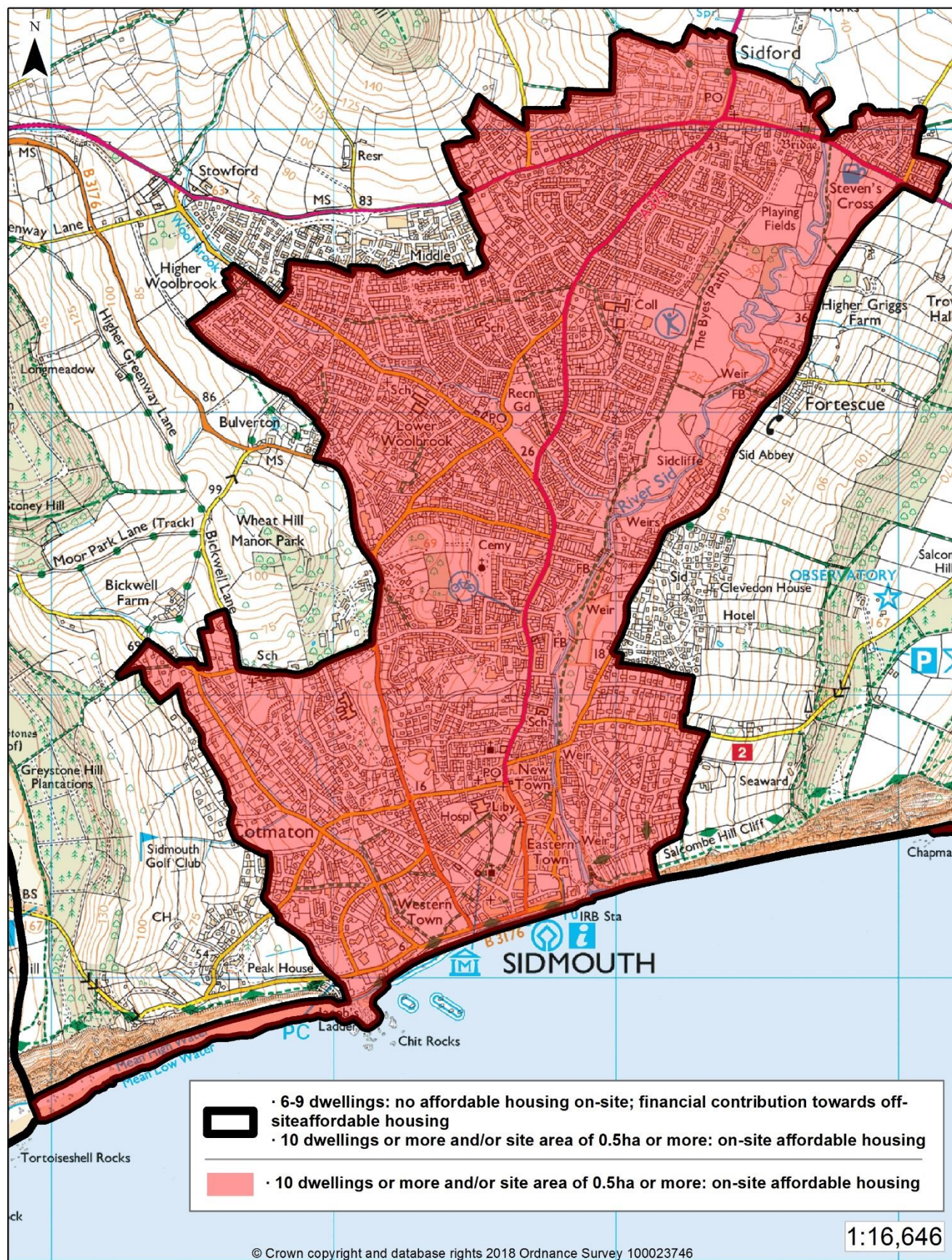






## Affordable Housing Thresholds - Seaton





## Affordable Housing Thresholds - Sidmouth



## **Appendix Two – Affordable housing policies in the East Devon Local Plan 2013-2031**

### **Strategy 34 - District Wide Affordable Housing Provision Targets**

Affordable housing will be required on residential developments in East Devon as follows.

**Within the areas defined below a target of 25% of the dwellings shall be affordable :**

- a) Axminster;
- b) Exmouth;
- c) Honiton;
- d) Ottery St Mary;
- e) Seaton; and
- f) Major strategic 'West End' development sites.

Under this policy:

- 1 the towns listed above are defined by the area within the Built-up Area Boundary
- 2 the major strategic West End development sites to which policy will apply are
  - a) Cranbrook,
  - b) adjacent to Pinhoe and
  - c) North of Blackhorseas shown on the West End inset map (to the Proposals Plan)

**Areas to which higher (50%) affordable housing targets apply:** Outside of the areas listed above (i.e. all other parts of East Devon including all settlements not listed, coastal and rural areas and Budleigh Salterton and Sidmouth) 50% of the dwellings shall be affordable subject to viability considerations. The 50% figure applies to all areas that do not come under the 25% classification and which are permitted under Strategy 35 'Exceptions' policy.

Where a proposal does not meet the above targets it will be necessary to submit evidence to demonstrate why provision is not viable or otherwise appropriate. An overage clause will be sought in respect of future profits and affordable housing provision, where levels of affordable housing fall below policy targets.

Looking across the lifespan of the plan an affordable housing policy provision target of 70% social or affordable rent accommodation and 30% intermediate or other affordable housing is sought. However in periods of depressed markets an alternative negotiated mix to reflect viability considerations and help deliver schemes will be acceptable. The District Council will consider issues of development viability and housing mix including additional costs associated with the development of brownfield sites, mitigation of contamination and the provision of significant community benefits provided the assessment process is completely transparent and there is full financial disclosure by stakeholders.

The thresholds at which this policy shall apply will be the minimum set out in Government policy or guidance (including any lower thresholds which Local Planning Authorities have the discretion to establish) subject to an up to date Council viability assessment showing that these thresholds can be justified. Where there is no applicable Government Policy or Guidance there will be no

minimum size threshold at which affordable housing will be sought, subject to there being up to date strategic evidence that the general delivery of housing would not be significantly undermined.

Affordable housing shall be provided on site unless it is exempted through Government Policy or Guidance, is not mathematically possible or where off site provision of equivalent value is justified by circumstances such as no registered provider being willing to manage the new affordable units or other planning reasons. In such cases a payment towards an off site contribution will be required in lieu of on site provision. On any development site affordable housing should be 'pepper-potted' or dispersed throughout the scheme.

### **Strategy 35 – Exception Mixed Market and Affordable Housing At Villages, Small Towns and Outside Built-up Area Boundaries**

Exception site mixed affordable and open market housing schemes, at villages and outside of Built-up Area Boundaries, for up to or around 15 dwellings will be allowed where there is a proven local need demonstrated through an up to date robust housing needs survey. Affordable housing must account for at least 66% of the houses built.

For:

- a) Villages WITH a Built-up Area Boundary the scheme must be abutting or physically closely related to that boundary; or
- b) Villages WITHOUT a Built-up Area Boundary the scheme should be physically very well related to the built form of the village.

To be permitted evidence will need to show

- 1. The affordable housing need in any given locality would not otherwise be met, and
- 2. The village or small town has a population that falls below 3,000 persons, the scheme is well designed using local materials, close to a range of community services and facilities (including four or more of a school, pub, village hall, shop/post office, doctors surgery, place of worship or public transport service) and sympathetic to the character of the settlement and has a satisfactory highway access.
- 3. Initial and subsequent occupancy of the affordable housing is restricted to a person(s) who:
  - a) Does not have access to general market housing and is in housing need; and
  - b) Is a resident of that Parish group, or has a local connection with that parish group because of family ties or a need to be near their workplace.

In the event that an occupier who fulfils both criterion (a) or (b) cannot be found within a reasonable period of time, then the criterion will be widened firstly to a person(s) with a local connection to the parish group because of family ties or a need to be near their workplace, and subsequently to a person(s) with an East Devon connection.

**In this policy, local connection** means one or more of the following connections in priority order in respect of parishes or the parish grouping:

- i) persons who have been permanently resident therein for a continuous period of three years out of the five years immediately prior to the Affordable Dwelling being offered to them; or
- ii) being formerly permanently resident therein for a continuous period of five years at some time in the past;
- iii) having his or her place of permanent work (normally regarded as 16 hours or more a week and not including seasonal employment) therein for a continuous period of at least twelve (12) months immediately prior to being offered the Affordable Dwelling; or



- |     |   |
|-----|---|
| iv) | persons who can demonstrate a close family connection to the District in that the person's mother, father, son, daughter or sibling has been permanently resident therein for a continuous period of five years immediately prior to the Affordable Dwelling being offered to them and where there is independent evidence of a caring dependency relationship. |
|-----|---|

## **Strategy 36 - Accessible and Adaptable Homes and Care/Extra Care Homes**

### **Accessible and Adaptable Homes**

On residential development schemes for 10 dwellings or more developers should demonstrate that all of the affordable housing and around 20% of market units will meet part M4(2) of the Building Regulations, Category 2: accessible and adaptable dwellings (or any comparable updated nationally set standards) unless viability evidence indicates it is not possible.

Where there are elderly population levels in a settlement that substantially exceed East Devon average levels, for any housing planning application in that settlement the council will seek to negotiate a greater proportion and/or a lower threshold for accessible and adaptable dwellings (or any comparable updated nationally set standards) unless viability evidence indicates it is not possible. The expectation is that the majority of units would be of two bedrooms or more.

### **Care/Extra Care Homes and Other Forms of Specialist Older Person's Housing**

**We will aim to secure Care and Extra Care homes in all of our Towns and Larger Villages in line with provision of:**

- a) 150 Care/Extra Care Home Spaces at Exmouth;
- b) 50 Care/Extra Care Home Spaces at Axminster, Honiton, Sidmouth, Seaton and Ottery St Mary; and
- c) 10 (or more) at larger settlements with a range of facilities that have easy accessibility to a GP surgery.

Care/Extra Care home proposals will be acceptable on sites allocated for residential development (or which include residential uses as part of an allocation, though in such cases provision should be 'off-set' against the residential element/land). Proposals for specialist housing should be accompanied by a Care Needs Assessment which justifies the proposal's scale, tenure and accommodation type. Where such provision is proposed on an allocated housing site the actual need for provision should also be established. The Council will take account of financial viability considerations, and overall contributions for affordable housing, where older person housing is proposed on or as part of a site for residential development and such provision impacts on site viability.

## Appendix Three – Standard section 106 agreement for affordable housing

### SCHEDULE 1

#### COVENANTS WITH THE DISTRICT COUNCIL

##### Part A: Affordable Housing Provisions

The Owner hereby covenants with the District Council as follows:-

##### 1. Definitions

For the purposes of this Schedule the following words will have the following meanings:

“Affordable Housing”	Means (subject to the provisions of this Agreement units of subsidised housing within the meaning of National Planning Policy Framework or any Government Policy Statement or Circular that replaces it
Affordable Rent	means a rent of up to 80% of local market rent to include the service charge (where applicable) and in any event should not exceed the published Local Housing Allowance for the relevant property type and in the relevant market area
“Affordable Rented Dwelling”	means a Dwelling available to those whose needs are not adequately served by the commercial housing market let at an Affordable Rent and which complies with the definition of affordable rented housing in Annex 2 of the National Planning Policy Framework
“Affordable Shared Ownership Dwelling”	means a Dwelling for sale on a shared ownership basis solely by way of a Shared Ownership Lease
“Affordable Housing Units”	means the <del>XX</del> Dwellings to be provided as Affordable Housing comprising <del>X</del> Affordable Shared Ownership Dwellings and <del>XX</del>



	Affordable Rented Dwellings to be provided in accordance with the provisions of this Schedule on the Affordable Housing Site
“Affordable Housing Scheme”	means the scheme for securing the provision of the Affordable Housing Units on the Affordable Housing Site as hereinafter defined more particularly; <ul style="list-style-type: none"> <li>- the location of,</li> <li>-mix of unit types</li> <li>- name of proposed Registered Provider</li> <li>- details of the proposed unit size and applicable Design and Quality Standard</li> <li>- proposed tenure for those units; and</li> <li>- the proposed timetable for such provision</li> </ul>
“Affordable Housing Site”	means the land to accommodate the Affordable Housing Units including curtilage as shown within the land shown edged [yellow] on the Plan annexed hereto
Affordable Home Ownership	Means (subject to the provisions of this Agreement units of subsidised housing for sale within the meaning of Other Affordable Routes to Home Ownership within the National Planning Policy Framework or any Government Policy Statement or Circular that replaces it
“Affordable Housing Provider”	means a housing association or similar organisation or a social landlord in each such case registered with the Housing Corporation under Section 1 of the Housing Act 1996 or such other body or organisation whose main object is the provision of Affordable Housing as agreed in writing by the District Council
“Design and Quality Standards”	Means that the Affordable Housing Units shall be constructed;

	<ul style="list-style-type: none"> <li>(i) strictly in accordance with the plans and elevations deposited and as approved by the District Council as part of the Planning Permission</li> <li>(i) to meet part M4(2) of the Building Regulations Category 2: accessible and adaptable dwellings (or any comparable updated nationally set standards)</li> <li>(ii) in accordance with Homes England's design and quality standards and the Affordable Housing Provider's own design standards applicable at the time of Commencement of Development</li> <li>(iii) Tenure blind so as to be indistinguishable from Private Dwellings</li> </ul>
"Designated Person"	Means a person or family who is registered with Devon Home Choice or Help to Buy South West and is in Housing Need
"District"	means the administrative area of the East Devon District Council
"Devon Home Choice"	means a choice based lettings scheme developed and operated in partnership between the District Council and the Registered Provider or any successor scheme or arrangement agreed as a replacement for Devon Home Choice
Help to Buy South West	Means the Government appointed local help to buy agency which provides a one stop shop for households seeking all forms of low cost home ownership
"Housing Need"	Means being homeless or threatened with homelessness or living in accommodation which in the opinion of the District Council is Insecure or unsuitable and being unable to purchase or rent reasonably suitable accommodation in the open market for property in the locality where the Affordable Housing Unit is situated taking into account the person's income and capital and

	other financial circumstances. Accommodation may be unsuitable on the grounds of cost, overcrowding, unfitness or lack of basic amenities or because of a person's infirmity, physical disability, mental disability or specific social or care needs
"Insecure"	means accommodation which the Designated Person does not have a legal right to occupy in the long term
Lettings Notice	<p>Means a notice the content of which is to be agreed with the District Council which contains details of the property to be let and which shall include unless otherwise agreed with the District Council</p> <ul style="list-style-type: none"> <li>a) The name and address of the landlord and the Owner</li> <li>b) The postal address of the property</li> <li>c) The amount of the Weekly or monthly rent (not to exceed the Affordable Rent)</li> <li>d) Amount and breakdown of any service charge per week/month/annum</li> <li>e) Details of any additional charges</li> <li>f) Any age or other occupancy restrictions</li> <li>g) Property type</li> <li>h) Property size</li> <li>i) Heating type</li> <li>j) Details of mains services in the property</li> <li>k) Availability of parking space/garage</li> <li>l) Any disabled adaptations</li> <li>m) Provision of any support services</li> </ul> <p>And which is delivered to the District Council clearly addressed and marked for the attention of Housing Enabling and Allocations Manager PROVIDED THAT for the avoidance of doubt an advertisement for the Affordable Rented dwelling placed on Devon Home Choice and approved by the District</p>



	Council shall be considered a Letting Notice for the purpose of paragraph ##### of schedule 1
"Local Connection"	<p>means a connection to the Parish of ##### demonstrated by one or more of the following in priority order:</p> <ol style="list-style-type: none"> <li>(1) being permanently resident therein for a continuous period of at least six (6) months out of the last twelve (12) months or for a continuous period of three (3) years out of the last five (5) years immediately prior to being offered the Affordable Housing Unit; or</li> <li>(2) being formerly permanently resident therein for a continuous period of five (5) years; or</li> <li>(3) having his or her place of permanent work (normally regarded as 16 hours or more a week and not including seasonal employment) therein and in the case of where the Affordable Housing Unit is within a village, small town and outside a built up area boundary as set out in the East Devon Local Plan, has also been in permanent employment for a continuous period of at least twelve (12) months immediately prior to being offered the Affordable Housing Unit; or</li> <li>(4) having a connection through a close family member (normally mother, father, brother, sister, son or daughter) where the family member is currently resident therein and has been so for a continuous period of at least five (5) years immediately prior to being offered the Affordable Housing Unit and in the case where the Affordable Housing Unit is within a village, small town and outside a built up area boundary as set out in the East Devon Local Plan, there is independent evidence that the family member is in need of support or can give support; or</li> <li>(5) such person as is prescribed by the Allocation of Housing (Qualification Criteria for Right to Move) (England) Regulations 2015</li> </ol> <p>and in the event that no-one satisfying the above requirements can be found within the Parish of XXXXXXXX then the process shall be</p>

	<p>repeated considering persons from the following areas in the following priority order;<sup>89</sup></p> <p>(1) the Neighbouring Parishes,</p> <p>(2) persons from the District</p> <p>(3) persons from the county of Devon with prior written approval of the District Council</p>
Local Housing Allowance	<p>means the flat rate rental allowance providing financial assistance towards the housing costs of low income households for different rental market areas and property types set out and reviewed by the valuation office agency under a framework introduced by the Department of Works and Pensions or such similar framework that may replace it.</p>
“Neighbouring Parishes”	<p>means the parishes of <del>XXXXXX</del>,</p>
“Scheme of Advertising”	<p>means the advertising for sale or letting of any interest in the relevant Affordable Housing Units in accordance with a scheme to be approved in writing by the District Council (such approval not to be unreasonably withheld or delayed) which scheme shall include unless otherwise agreed with the District Council</p> <p>a) in the case of Affordable Rented Dwellings an advertisement on the website of Devon Home Choice or such other similar website for advertising of Affordable Housing Units as agreed by the District Council; or</p> <p>b) in the case of the Shared Ownership Dwellings and Affordable Home Ownership Units an advertisement on the website of Help to Buy South West being the Government appointed help to buy agent for Devon or other successor organisation</p>

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<sup>89</sup> This priority order does not currently reflect the text in paragraph 7.11, but will be amended/finalised when the Affordable Housing SPD is adopted.

	c) in the case of Affordable Home Ownership Units an advertisement on a prior approved relevant website as agreed by the District Council
“Shared Ownership Lease”	means a long shared ownership lease (as defined in section 622 of the Housing Act 1985 or successor provision) with a Affordable Housing Provider substantially in accordance with Homes England (or successor body) Model as at the date of any such lease where the purchaser purchases an initial share of the equity between 25 – 80% and pays rent on the remaining unsold equity provided that such rent per annum shall initially be at a level not exceeding 2.75% of the Open Market Value of the affordable housing providers retained share of the relevant affordable housing unit: and not be at a level which is in conflict with any applicable Homes England restrictions relating to charges payable by the tenant [and where additional share of the equity can be purchased provided that no more than 80% of the equity can be purchased] [DPA areas only]
“Staircasing Receipts”	Means any monies received by the approved Affordable Housing Provider of an Affordable Shared Ownership Dwelling as a result of the leaseholder exercising a right to increase their share of the equity (and any part of such monies)

## 2. Affordable Housing Provision

2.1 Not to carry out or otherwise permit the Commencement of Development unless and until the Affordable Housing Scheme has been submitted to and approved in writing by the District Council

2.2 To construct and provide the Affordable Housing Units in accordance with the Affordable Housing Scheme approved pursuant to paragraph 2.1 above and in accordance with the Design and Quality Standards

2.3 Notwithstanding the requirements of paragraphs 2.1 and 2.2 above to have transferred the freehold interest or leasehold (of a minimum period of 80 years) interest in the Affordable Housing Site to the Affordable Housing Provider and to have completed all of the Affordable Housing Units prior to the Occupation of the [Thirteenth (13th)] Private Dwelling and not to permit Occupation of the [Thirteenth (13th)] Private Dwelling until such transfer has occurred and all of the Affordable Housing Units have been completed and are available for Occupation

2.4 The Affordable Housing Units shall only be used for the purpose of providing Affordable Housing and shall be so used in perpetuity (here meaning for a minimum period of 80 years)

2.5 The transfer of the Affordable Housing Site and / or the Affordable Housing Units to the Affordable Housing Provider shall be in such form as the Owners shall reasonably require to ensure that the Affordable Housing Site and / or the Affordable Housing Units are subject to the same rights and easements and covenants (both restrictive and positive) as are to be granted and reserved in sales of the Private Dwellings

2.6 To ensure that the Affordable Housing Site and / or Affordable Housing Units together with their respective curtilages will abut a publicly adopted highway or roads and footways the subject of a bonded road making agreement under section 38 of the Highways Act 1980 (or enjoy ready and free access thereto via an intervening private drive) and have ready and free access to all usual domestic services needed for residential occupation of such Affordable Housing Units without the Affordable Housing Provider having to make any payment either to the Owner or any third party for any right of way or right to use such services or connect to them

2.7 The transfer of the Affordable Housing Site and the Affordable Housing Units to the Affordable Housing Provider will contain a declaration that the Affordable Housing Site is so transferred subject to and with the benefit of the terms of this Agreement

2.8 At least 10 Working Days prior to Occupation of the [Thirteenth (13th)] Private Dwelling to serve on the District Council a Trigger Point Notice to notify date of Occupation of the [####(##)] Private Dwelling

2.9 At least one month to the date when the Affordable Housing Units (or any of them) shall be available for Occupation to serve on the District Council a Trigger Point Notice to notify date Affordable Housing Units shall be available for Occupation.



### **3. Restrictions on Occupation of Affordable Housing Units**

3.1 The Owners and/or Affordable Housing Provider as appropriate shall not at any time permit the Affordable Housing Units to be occupied other than as Affordable Housing by a Designated Person (and their dependents) who has a Local Connection

#### **Affordable Rented dwellings**

4.1 Not to permit or otherwise allow any of the Affordable Rented Dwellings to be let other than:

4.1.1 To a Designated Person

4.1.2 At a sum not exceeding the Affordable Rent; and

4.1.3 To persons selected in accordance with the principles of the Devon Home Choice policy whether or not the Affordable Housing Provider is a member of the Devon Home Choice scheme

4.2 Not to permit or otherwise allow any of the Affordable Rented Dwellings to be let on initial or subsequent letting prior to the submission to and approval by the District Council of a Scheme of Advertising for the Affordable Rented Dwellings

4.3 To serve upon the District Council a Letting Notice each time an Affordable Rented Dwelling becomes available for letting

4.4 To advertise the relevant Affordable Rented Dwelling in accordance with the Scheme of Advertising approved in accordance with paragraph 4.2 of this First Schedule immediately following the service of a Letting Notice in accordance with paragraph 4.3 of this First Schedule

4.5 Not to grant a tenancy of the relevant Affordable Rented Dwelling until the Owner or Affordable Housing Provider has submitted written verification to the District Council that the prospective tenant satisfies the obligations contained in this Deed and the District Council has given its approval that the prospective tenant would satisfy the obligations contained in the Deed (such approval not to be unreasonably withheld) and if no response is given by the District Council within 10 Working Days of receipt of written verification from the Affordable Housing Provider then approval will be deemed to have been given PROVIDED THAT such written verification is served upon the District Council clearly addressed and marked for the urgent attention of the Housing Enabling and Allocations Manager

4.6 The Affordable Housing Provider shall if so required by the District Council provide to the District Council (together with the written verification detailed in paragraph 4.2 above) all necessary documentation as stipulated in Annex 2 as evidence that the prospective tenant satisfies the obligations contained in this Deed.

#### Affordable Home Ownership

5.1 Not to permit or otherwise allow any of the Affordable Home Ownership Units to be sold or let other than:

5.1.1 by way of a Shared Ownership Lease; or

5.1.2 by way of another Affordable Home Ownership product which shall be agreed in writing with the District Council and

5.1.3 to a Designated Person who is either releasing an Affordable Housing Unit elsewhere in the District or is in Housing Need

5.2 Not to permit or otherwise allow any of the Affordable Home Ownership Units to be sold or let on initial or subsequent sale or letting prior to:

5.2.1 the submission to and subsequent approval by the District Council of a Scheme of Advertising for the Affordable Home Ownership Units; and

5.2.2 advertising the relevant Affordable Home Ownership Units in accordance with the approved Scheme of Advertising at 5.2.1 above

5.3 In the event that the Affordable Housing Provider or the owner of an [Affordable Home Ownership Units] is unable to sell the [Affordable Home Ownership Units] in accordance with paragraph 5.1.3 above within a period of 60 Working Days of advertising the [Affordable Home Ownership Units] may be sold or rented to any willing purchaser by way of:

5.3.1 an Intermediate Rent being 80% of the Open Market Rent

5.3.2 an Alternative Affordable Housing product as shall have been approved in writing by the District Council (such approval not to be unreasonably withheld or delayed) and such person shall remain bound by the terms of this Deed

5.4 Not to exchange or complete contracts for the sale of any interest in the relevant [Affordable Home Ownership Units] until the Owner has submitted written verification to the District Council that the prospective purchaser satisfies the obligation contained in this Deed and the District Council has given its approval that the prospective purchaser satisfies the obligations (such approval not to be unreasonably withheld) and if no response is given by the District Council within 10 Working Days of receipt of written verification from the Affordable Housing Provider then approval will be deemed to have been given PROVIDED THAT such written verification is served upon the District Council clearly addressed and marked for the urgent attention of the Housing Enabling and Allocations Manager

5.5 The Affordable Housing Provider or Owner of the Affordable Home Ownership Units shall if so required by the District Council provide to the District Council (together with the written verification

detailed in paragraph 5.4 above) all necessary documentation as stipulated in Annex 2 as evidence that the prospective purchaser satisfies the obligations contained in this Deed.

## **6 Release**

6.1 None of the obligations and restrictions referred to in Part A of this Schedule will be enforceable in respect of any mortgagee or chargee or any receiver (including an administrative receiver) appointed by such mortgagee or chargee or any other person appointed under any security documentation to enable such mortgagee or chargee to realise its security or any administrator (howsoever appointed) including a housing administrator (reach a Receiver) of the whole or any part of the Affordable Housing Site or any persons or bodies deriving title through such mortgagee or chargee or Receiver PROVIDED ALWAYS that the mortgagee or chargee or Receiver has complied with its obligations contained in paragraphs 6.2 below

6.2 The mortgagee or chargee or Receiver shall prior to seeking to dispose of the Affordable Housing Site or any Affordable Housing Unit(s) pursuant to any default under the terms of its mortgage or charge shall give not less than three months' prior notice in writing to the District Council of its intention to dispose and;

(i) In the event that the District Council responds within three months from receipt of the notice indicating that arrangements for the transfer of the Affordable Housing Site or Affordable Housing Unit(s) can be made in such a way as to safeguard them as Affordable Housing then the mortgagee or chargee or Receiver shall cooperate with such arrangements and use its reasonable endeavours to secure such transfer

(ii) If the District Council or any other person cannot within three months of the date of service of its response under paragraph 6.2 (i) secure such transfer then provided that the mortgagee or chargee or Receiver shall have complied with its obligations under paragraph 6.2 the mortgagee or chargee or Receiver shall be entitled to dispose of the Affordable Housing Site or Affordable Housing Unit(s) free of the restriction set out in this First Schedule

PROVIDED THAT at all times the rights and obligations in paragraph 6.2 shall not require the mortgagee or chargee or Receiver to act contrary to its duties under the charge or mortgage and that the District Council must give full consideration to protecting the interests of the mortgagee or chargee or Receiver in respect of monies outstanding under the charge or mortgage

6.3 In relation to any Affordable Housing Units the Affordable Housing obligations in this Deed shall not apply to;

6.3.1 any sale to a tenant in exercising their right to acquire or purchase under a statutory power or to the successors in title to any such persons

6.3.2 in relation to any Affordable Shared Ownership Dwelling where the owner of the said unit has been granted a waiver to the requirements of the Designated Protected Area Order (SI 2009/2098) (or such other regulations restricting the ability to achieve 100% staircasing) the owner subsequently acquires such percentage that will take their ownership to 100% of the said unit or to the successors in title to any such persons

6.4 In the event of any Affordable Shared Ownership Dwelling being released from the Affordable Housing restrictions herein contained by virtue of the operation of paragraph 4.3.2 above the Owner shall provide the District Council with details of Staircasing Receipts from the Affordable Shared Ownership Dwellings and in co-operation with the District Council reach agreement to invest 100% of the Staircasing Receipts, if any, arising from the Affordable Shared Ownership Dwellings in the provision of new build Affordable Housing or to invest in measures to enhance the provision of Affordable Housing within the administrative area of the District Council including facilitating the acquisition of market housing or the conversion or refurbishment of existing housing to bring such housing back into beneficial use to enable it to be occupied provided that the use of the Staircasing Receipts is limited to the provision within District

## **7. Provision of Information**

7.1 The Affordable Housing Provider will on request from the District Council allow the District Council to inspect or provide to the District Council such information as is necessary in order to enable the District Council to verify that the Affordable Housing Provider has sold or let of the Affordable Housing in accordance with the terms of this Schedule

## **ANNEX 2**

to the

## **FIRST SCHEDULE**

**(Evidence of eligibility of Qualifying Persons)**



Pursuant to paragraphs 4.5 and 4.6 of Part A and paragraphs 5.5 and 5.6 of Part A of the First Schedule the Owner shall verify to the District Council or its agent that the prospective purchaser or tenant meets the terms of this Deed by obtaining appropriate documentation from section A and B and C below or such other evidence or confirmation as the District Council or its agent shall deem necessary or sufficient and if required by the District Council or its agent provide copies of such evidence to the District Council or its agent

## **SECTION A:**

### **Proof of identity (of prospective purchaser or tenant and where applicable close family member)**

A current and valid passport

UK residence permit

A valid UK driving licence National Insurance number card

Marriage certificate

Medical card

Letters about asylum from the Home Office

## **Section B:**

### **Local connection**

#### **Residency – sufficient evidence to cover the relevant local connection period for prospective purchaser/tenant/close family member as appropriate**

Utility bills (gas electric phone etc)

Council tax bills

Bank/Building Society account/credit card statements

State benefit books or receipts showing rent paid

Payslips showing home address

Written certification from either a Solicitor / Social Worker / Probation Officer / Inland

Revenue Officer / Police Officer / Teacher or Doctor

**Employment – sufficient evidence to cover the relevant local connection period**

Payslips showing employer's address

Employer's letter confirming length and terms of employment (including hours worked if applicable)

**Section C:**

**Housing Need**

Tenancy or licence agreement

Rent book showing name and address of applicant

Where applicable letter from friend or family member confirming residence at their address

P60 annual statement of earnings for the most recent complete tax year

Payslips covering last 3 months

For self- employed persons a set of accounts no older than 12 months

Bank/Building Society account or other statements showing savings/capital

Evidence of any other income including state benefits



