

Agenda for Strategic Planning Committee Tuesday, 31st October, 2023, 10.00 am

Members of Strategic Planning Committee

Councillors: B Bailey, J Bailey, K Blakey, B Collins, O Davey (Chair), P Fernley, C Fitzgerald, M Hartnell, P Hayward, M Howe (Vice-Chair), B Ingham, D Ledger, Y Levine, T Olive and H Parr

Venue: Council Chamber, Blackdown House, Honiton

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(or group number 01395 517546)

Issued: Friday, 20 October 2023



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- 1 Minutes of the previous meeting (Pages 3 - 8)
Minutes of the Strategic Planning Committee meeting held on 3 October 2023.
- 2 Apologies
- 3 Declarations of interest
Guidance is available online to Councillors and co-opted members on making [declarations of interest](#)
- 4 Public speaking
Information on [public speaking](#) is available online
- 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 East Devon Local Plan 2020-2040 Consultation Draft - Consultation Feedback Addendum (Pages 9 - 16)
- 8 East Devon Local Plan - Timetable and Local Development Scheme (Pages 17 - 27)
- 9 East Devon Local Plan - A Proposed New Vision (Pages 28 - 35)

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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, Honiton on 3 October 2023****Attendance list at end of document**

The meeting started at 10.03 am and ended at 1.10 pm. The meeting was adjourned at 11.00 am and reconvened at 11.15 am.

25 Minutes of the previous meeting

The minutes of the Strategic Planning Committee held on 5 September 2023 were confirmed as a true record.

26 Declarations of interest

There were no declarations of interests.

27 Public speaking

There were no members of the public wishing to speak.

28 Matters of urgency

There were no matters of urgency.

29 Confidential/exempt item(s)

There were no confidential or exempt items.

30 Housing Monitoring Update to year ending 31 March 2023

The Committee considered the Assistant Director – Planning Strategy and Development Management's report outlining the latest monitoring figures on housing completions, forecasts and projections of the district's five-year housing land supply to year ending 31 March 2023.

Members noted that in summary from April 2022 to March 2023 there were 998 net new dwellings completed after taking into account 67 care home bedrooms compared to 1,039 completed from April 2021 to March 2022.

The main reasons that the council could only demonstrate a forecast of 4.28 years of deliverable supply were due to:

- a) The Planning Inspectorate taking a stricter approach on clear deliverability on planning appeals;
- b) The slow-down in build rates and sales due to the current challenging housing market conditions;
- c) Loss of developers/builders due to administration.

The Assistant Director – Planning Strategy and Development Management advised that because of the significant shortfall in housing land supply. Members should be mindful of the implications for decision making as set out in paragraph 3.9 in the report.

Comments made by Non-Committee Members included:

- There is a need to look at how we calculate windfall sites. It was advised that the larger development sites were not taken into account.
- Clarification was sought about the high phosphate levels in the River Axe and if the levels were sorted and development could commence in the catchment area would this help achieve the five-year housing land supply. In response it was advised that there were only about 150 homes held up at the application stage purely because of by the phosphate level issue. A much larger numbers of applications had other issues to resolve which were on top of the phosphate levels. This is impacting on the housing land supply position but would not in itself make up the shortfall.
- Clarification was sought on the number of affordable homes completed and whether the council was delivering the required 25%. The Assistant Director – Planning Strategy and Development Management advised that a lot of the smaller sites fell below the required threshold to provide affordable housing and that a number of the larger sites were subject to viability issues which resulted in developers delivering less than the required proportion.
- It was suggested that the housing delivery test was flawed following a government report in March 2023 which appeared to penalise councils.

Comments made by Committee Members included:

- Clarification was sought about lapsed consented planning applications and whether landowners were reminded about these as these would help bolster the five-year land supply. There was not a process in place to send out reminders. Although it was acknowledged it was a contributing factor, it was not a major factor, and that more research was required to understand this further.
- Clarification was sought on the AONBs and the lack of a five-year housing land supply and how this would affect AONB areas if the town or parish council did not have a neighbourhood plan. The Assistant Director – Planning Strategy and Development Management referred to the tilted balance in the government guidance and did not expect additional development to take place in AONBs as a result of the housing land supply position and that policies in the local plan would be relied on if there was not a neighbourhood plan.
- Clarification was sought on whether the pause on the assessment of housing sites in the draft local plan had affected the current position. There was no immediate impact but progressing the local plan in a timely manner would help bolster the housing numbers in the long term.
- Clarification was sought on paragraph 3.9. In response the Assistant Director – Planning Strategy and Development Management referred to paragraph 11 in the NPPF which outlined what is a sustainable development and reassured Members it was not an open door for developers.
- Reference was made to Section 5 in the appended report and the inequality of the supply of houses in the West End of East Devon and the rest of East Devon.
- Reference was made to the housing monitoring figures for the last 4 years for windfall completions and whether there was a plan to review the way these numbers were calculated as it appeared the council was systematically underestimating the number of windfall sites coming forward. The Assistant

Director – Planning Strategy and Development Management took this point on board and said he was happy to look into this further.

Two further recommendations were proposed by Councillor Mike Howe and Councillor Jess Bailey which were supported by the proposer of the recommendations, Councillor Ben Ingham and seconder, Councillor Charlotte Fitzgerald.

1. that this report and its decision be reported to the East Devon District Council Planning Committee.
2. That a report in respect of the issues relating to windfall sites be brought to a future Strategic Planning Committee meeting.

RESOLVED:

1. That the district five-year housing land supply position and the potential risks and implications of the forecast supply as detailed in Section 5 of the Housing Monitoring Update 2023 be noted.
2. That the residential dwellings completion date and future forecasts for the district be noted.
3. That the Housing Monitoring Update 2023 be published on the Council's website as part of the Authority Monitoring Report.
4. That the publication of the 2023 Housing Monitoring Update audit trail document and the detailed tables in Appendix 2 of the Housing Monitoring Update 2023 be delegated to the Assistant Director – Planning Strategy and Development Management in consultation with the Portfolio Holder – Strategic Planning and the document be published by the end of October 2023 on the Council's website as part of the Authority Monitoring Report.
5. That this report and its decision be reported to the East Devon District Council Planning Committee
6. That a report in respect of the issues relating to windfall sites be brought to a future Strategic Planning Committee meeting.

31 **Methodology for the designation of Green Wedges in the new local plan**

The report presented to the Committee sought endorsement of the methodology for defining Green Wedges in the new local plan prior to the consultation at the Regulation 18 stage of the draft local plan. This was following previous discussions where Members had highlighted issues where, in principle, Green Wedges should be designated between nearby settlements to avoid the risk of coalescence or loss of identity.

The Assistant Director – Planning Strategy and Development Management referred Members to paragraph 2.2.1 in Appendix 1 which identified the existing Green Wedges and highlighted that sites already identified as proposed development allocations in those areas would be excluded from the areas to be assessed. It was also highlighted that Green Wedges would also not be considered for the proposed new settlement as master planning would be required first.

The assessment methodology that was before Members outlined the various stages. It included the assessment criteria that would help to prevent the coalescence of settlements and to maintain a sense of place and identity for communities and proposed to assess potential Green Wedge locations against the criteria through strengths and evidence.

Many Members voiced their concerns on the content of the assessment methodology.

Discussion covered:

- Several Members suggested that Green Wedges should have been looked at before the development.
- Town and Parish Council views would need to be considered prior to the consultation stage.
- A concern was raised about the time frame and to avoid a public consultation over the Christmas period.
- It was not clear in paragraph 2.2.1 whether the sites identified as proposed development include both the first and second choice sites.
- It was questioned whether the criteria that defined the Green Wedges previously proposed was correct.
- There was no mention of assessing Green Wedges already mentioned in neighbourhood plans.
- A concern was raised about the evidence criteria that focussed heavily on the visual impact on landscapes when in reality the impact would need to focus on more than what can be seen.
- Clarification was sought on the receipt of a report on the new settlement.
- Concern was raised about whether there would be a Green Wedge between the new settlement and Farringdon.
- There was a need to update the interactive map to help visualise how things would change.
- Not happy with the proposed method as there was no indication of how to safeguard against encroachment.
- Disagreement with paragraph 2.2.1
- More work was needed, better plans, more detailed discussions and more Member involvement, not just officers.
- There was a need to protect all Grade 1 farmland.
- It was suggested that this would be looked at alongside wider needs for footpaths and cycleways linking settlements.

In response the Assistant Director – Planning Strategy and Development Management advised the Committee that Green Wedges are about preventing settlement coalescence and should not be confused with other countryside protections and landscape designations which fulfil different functions. It was also explained that while there was a need to look a green infrastructure and how sustainable travel between settlements can be improved this should not be conflated into this work and needed to be done separately.

The Vice Chair urged Members to consider the recommendations, to try to look at them as a purpose and as an understanding in policy terms as to why Green Wedges should be there and what they should be doing. It should not just be there to stop development.

Councillor Marcus Hartnell pointed out that much of the debate had not touched on the methodology and that if other local authorities had used this methodology and had reached successful conclusions on their Green Wedge policies he didn't see a reason not to proceed with the methodology.

At the end of the debate the Assistant Director – Planning Strategy and Development Management advised of the following key points that he recognised as concerns for Members.

These were:

1. A clear recognition in the methodology for officers to look at and assess areas identified in neighbourhood plans that have been allocated for purposes of preventing settlement coalescence.
2. Concern about paragraph 2.2.1 in the methodology and look at the conflict between allocations and Green Wedges with an action to report back to Strategic Planning Committee to flag up where there is a conflict between an allocation and a Green Wedge.

RESOLVED:

1. Amend the proposed methodology for defining Green Wedges, set out in appendix 1 of this report to include:
 - (a) consideration of all areas identified in neighbourhood plans that seek to prevent settlement coalescence.
 - (b) to identify conflicts between proposed allocations and Green Wedges for Members to consider further and,
 - (c) to ensure that all the areas identified for potential Green Wedges are considered under the methodology and that the methodology is used in the preparation of Green Wedge boundaries for consultation.
2. Agree that the proposed Green Wedges be brought to Committee in the first quarter of 2024 for Members consideration.

32 **Response to Government Consultation on plan-making reforms**

The Assistant Director – Planning Strategy and Development Management presented a report updating the Committee on the feedback provided by East Devon District Council on its concerns and considerations to the consultation that the Government were undertaking on proposed new style local plans.

Members noted the following key issues:

- The importance of having a vision in the local plan.
- To set out measurable outcomes for the plan period.
- The creation of National Development Management Policies.
- The ability to have genuine local policies.
- To explore digital technologies which can be used in templates.
- To have a 30-month plan timeframe.
- Supplementary plans would be more geographically defined.
- Community land auctions – opportunity to capture more value out of land.

RESOLVED:

That the proposed response to the consultation as set out in the report be endorsed and submitted as the Council's response to the consultation.

Attendance List

Councillors present (for some or all the meeting)

B Bailey
J Bailey
B Collins
O Davey (Chair)
P Fernley
C Fitzgerald

M Hartnell
M Howe (Vice-Chair)
B Ingham
Y Levine
T Olive
H Parr

Councillors also present (for some or all the meeting)

I Barlow
G Jung
M Rixson

Officers in attendance:

Ed Freeman, Assistant Director Planning Strategy and Development Management
Damian Hunter, Planning Solicitor
Wendy Harris, Democratic Services Officer

Councillor apologies:

K Blakey
P Hayward
D Ledger

Chairman

Date:



Report to: Strategic Planning Committee

Date of Meeting 31 October 2023

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

East Devon Local Plan 2020-2040 Consultation Draft – Consultation feedback addendum

Report summary:

Members have received a local plan consultation feedback report but it did not include sentiment scores from the questions asked around whether people supported, or opposed policies in the draft local plan. There were also a very limited number of cases where the feedback report did not record matters raised in representations.

To address these concerns an addendum feedback report has been produced. It is appended to this committee report. It will be published on the planning policy webpages alongside the full feedback report.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

(1) That Members note the addendum to the draft local plan consultation feedback report.

Reason for recommendation:

To highlight to members key themes raised in feedback on the draft local plan consultation.

Officer: Ed Freeman – Assistant Director, Planning Strategy and Development Management, e-mail efreeman@eastdevon.gov.uk; tel. 01395 517519.

Portfolio(s) (check which apply):

- Climate Action and Emergency Response
- Coast, Country and Environment
- Council and Corporate Co-ordination
- Communications and Democracy
- Economy
- Finance and Assets
- Strategic Planning
- Sustainable Homes and Communities
- Culture, Leisure, Sport and Tourism

Equalities impact Low Impact

Climate change Low Impact

Risk: Low Risk;

Links to background information

[Draft Local Plan Consultation - East Devon](#)

[Initial feedback committee report on consultation on the Draft East Devon Local Plan, SPC, 7 March 2023](#)

[Feedback committee report on consultation on the Draft East Devon Local Plan, SPC, 21 July 2023](#)

- [Local Plan Feedback Report - summary, contents & introduction](#)
- [Chapters 1-5 Introduction, evidence & policies](#)
- [Chapter 6 \(Part A\) Strategy for development at Principal Centres & Main Centres](#)
- [Chapter 6 \(Part B\) Strategy for development at Local Centre](#)
- [Chapter 6 \(Part C\) Strategy for development at Service Villages & Other Sites](#)
- [Chapters 7-10](#)
- [Chapters 11-14](#)
- [Chapters 15-18](#)
- [Other issues, responses to the Sustainability Appraisal, conclusions & next steps](#)
- [Appendices](#)

Link to [Council Plan](#)

Priorities (check which apply)

- Better homes and communities for all
- A greener East Devon
- A resilient economy

Financial implications:

There are no direct financial implication resulting from the report.

Legal implications:

There are no legal implications requiring comment.

ADDENDUM Feedback report on consultation on the draft East Devon Local Plan (Regulation 18) that was consulted on from 7 November 2022 to 15 January 2023



October 2023

The role of this addendum report

Consultation on a draft East Devon Local Plan started on the 7 November 2022 and ended on 15 January 2023. A summary of response comments on the draft local plan was produced and has been published on the council web site:

<https://eastdevon.gov.uk/media/a2dftt10/accessible-reg-18-consultation-feedback-report-spring-2023.pdf>

Since publication of the initial feedback report it has been noted that:

1. Sentiment scores were not published where people expressed a ‘tick-box’ degree of endorsement or preference for any particular policy option, and also
2. There have been a very limited number of matters that were not reported on or captured in the original feedback report that it is appropriate to highlight.

This addendum report addresses the above matters.

Sentiment score analysis

As part of the consultation on the draft local plan we set out a tick box question for people to set out their views (level of support or agreement, or lack of support or disagreement) on each policy in the plan. The analysis was not included in the original feedback report as there was clearly some confusion, specifically in respect of site assessment work over the universally asked question ‘How do you feel about development at this site?’.

For possible site choices where development was proposed in the plan, the question was seemingly understood – but when a site was rejected, i.e. where assessment of the site had taken place and the site was not allocated for development, we believe that there were two diametrically opposed interpretations of the question:

- One was that people were responding on the basis of our conclusion that the site should not be allocated for development – so they may have, for example, ticked the ‘**Agree**’ box because they agreed with the assessment and recommendation to not allocate for development; whereas,
- We suspect that some people read it as a question of whether they agree disagreed that the site should be allocated for development. Under such an interpretation they may also have been opposed to development but would have ticked the ‘**disagree**’ box.

Readers of the sentiment score analysis, forming Appendix 1 to this report, should do so bearing this above point in mind.

Matters missed out in the original feedback report

Since we completed the original feedback report it has been brought to our attention that there were a small number of matters that were not reported on in the original feedback report that should have received summary commentary. We have rectified this by including relevant details below that will be taken into account in future stages of plan preparation.

Missing site not reported on

In the initial feedback report we did not report on a site that had been promoted for development. A representation was received on a ‘Call For Sites’ form proposing Lodge Trading Estate at Broadclyst Station for development. This should have been included in the ‘Sites suggested at other settlements’ section of the earlier report.

The submission can be seen at:

https://eastdevon.gov.uk/media/bnjcbcsn/missing_cfs_submission.pdf

Additional representations omitted in error in respect of summaries of feedback received

There were three representations that were omitted in error when reviewing feedback. Two are from LRM Planning Limited – one on behalf of Barratt Homes (Exeter) Ltd re land to the west of Lilypond Lane in Whimple and one on behalf of The Cherwell Group re land at Axehayes Farm – and, finally, one is from Network Rail (Southern Region).

Land to the west of Lilypond Lane in Whimple (site ref. no. TBC) – LRM Planning Limited submitted a representation promoting this land for development. It was described as being well located in close proximity to a range of existing services and facilities, including Whimple train station, a strategic facility in the Local Plan’s evidence base, providing services to a range of destinations including the West End and Exeter.

The representation stated that development would deliver a number of benefits, including the provision of a new overbridge to the railway station and other off-site highway improvements, including passing bays and potential improvements to the existing overbridge to the north-east.

See their representations in full at:

https://eastdevon.gov.uk/media/oy4ifh1d/barratt-dwh2_email_redacted.pdf

https://eastdevon.gov.uk/media/jg1ebqiq/barratt-dwh2_fine.pdf

Land at Axehayes Farm (site ref. no. TBC) – LRM Planning Limited also submitted a representation promoting this land for development as part of the proposed new town. Additionally, the representation stated that LRM believe it is unlikely that the local plan will be adopted by 2025 and that if work on the preparation of the local plan extends beyond 2025, there will be an insufficient period after the adoption of the plan and the proposed end of the plan period. Consequently, it is likely that the plan period will need to be extended by two years to 2042.

See their representations in full at:

https://eastdevon.gov.uk/media/psyh5ygx/lrm-for-cherwell-2_redacted.pdf

https://eastdevon.gov.uk/media/l5llayk4/lrm-for-cherwell-1_redacted.pdf

Network Rail (Southern Region) – Submitted a representation advising that only a small proportion of new development is planned along the railway line between Exeter & Axminster and that additional housing growth along the line over and above that at Cranbrook would have helped improve the business case for the proposed service and infrastructure enhancements.

Network Rail would also welcome a discussion with EDDC (and DCC) to clarify what potential developer contributions could be made from developments in the plan (including Cranbrook) towards the capital cost and / or initial operational costs for the enhanced Devon Metro service between Axminster and Exeter.

See their representation in full at:

https://eastdevon.gov.uk/media/np4dt0ut/network-rail-southern_redacted.pdf

Clarification on in-person feedback from the Whimple consultation engagement event

It has been noted that Appendix 2 of the Consultation Feedback report, ‘Feedback from in-person submissions at the consultation events’, which specifically summarised comments made on paper slips at the events did not refer to the consultation event held in Whimple. This could have been read as an omission in the reporting.

For clarity, it should be noted that the reason for this was set out in the body of the main Consultation Feedback report within the section on ‘In-Person Consultation Events’ (p.23-24). This stated that: “Whimple was the first exhibition held. Paper comment slips asking people how many homes should be built in Whimple (from a selected range) were made available and some people added additional comments, but the more general comments slip used in subsequent exhibitions was not available.”

In addition to this, a further review of the comment slips regarding housing numbers at the Whimple event have identified the following more general comments recorded which are listed here as an addendum to Appendix 2 as first published:

- Improve rail and bus services. Cars needed because public transport dreadful. New school and better infrastructure needed;
- Where were our councillors tonight;
- What provision for additional primary school children?
- Important to retain character of village and to avoid infrastructure issues such as crowding on single track lanes into village;
- Houses should have solar panels rather than taking green fields.

Appendix 1 – Sentiments scores

<https://eastdevon.gov.uk/media/svhd3jqq/site-sentiments.pdf>

Report to: **Strategic Planning Committee**

Date of Meeting: 31 October 2023

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



East Devon Local Plan – timetable and Local Development Scheme

Report summary:

This report sets out a proposed timetable, highlighting key stages of work, for production of the East Devon Local Plan, specifically to take the plan through to submission for Examination. The report also seeks approval for a new Local Development Scheme, a new 'higher level' overarching project plan to take the local plan through to adoption.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

1. That Committee endorse the timetable and approach to local plan making work that is set out in this committee report.
2. That Strategic Planning Committee endorse the proposed new Local Development Scheme, appended to this report, and recommend it for adoption by Council.

Reason for recommendation:

To provide details of timetabling for local plan production.

Officer: Ed Freeman – Assistant Director, Planning Strategy and Development Management, e-mail – efreeman@eastdevon.gov.uk, Tel 01395 517519

Portfolio(s) (check which apply):

- Climate Action and Emergency Response
- Coast, Country and Environment
- Council and Corporate Co-ordination
- Democracy, Transparency and Communications
- Economy and Assets
- Finance
- Strategic Planning
- Sustainable Homes and Communities
- Tourism, Sports, Leisure and Culture

Equalities impact Low Impact

Climate change Low Impact

Risk: Low Risk;

Links to background information

The consultation draft local plan from November 2022 and other local plan papers can be viewed at:

[Draft Local Plan Consultation - East Devon](#)

Links to other background documents are contained in the body of this report.

Link to Council Plan

Priorities (check which apply)

- Better homes and communities for all
 - A greener East Devon
 - A resilient economy
-

1. Local plan work planning

- 1.1 At Strategic Planning Committee on 5 September 2023 Members of this committee received a report on future work areas and evidence reports for the local plan – see item 8: [Agenda for Strategic Planning Committee on Tuesday, 5th September, 2023, 10.00 am - East Devon](#) This committee report can be usefully read alongside the earlier committee report.
- 1.2 This report provides more detail, specifically including a Gantt (style) chart, setting out proposed dates at which key papers will come to committee and at when future consultation is proposed to take place. This report, drawing on these key dates, also recommends that committee endorse a proposed new Local Development Scheme (LDS) which sets out a programme and timetable for production of the local plan to adoption and which makes reference to other planning policy documents. The previous LDS dates from April 2022 and requires an update. The actual approval of the LDS is the responsibility of Council so it is recommended that this Committee seek Council approval.

2. Proposed new plan making timetable

- 2.1 Having reviewed evidence production timetables and plan making workloads (specifically noting details raised in the September report to this committee) officers have produced a new timetable for production of the local plan. This timetable is mindful of the fact that in consultation on a new proposed system for local plan making the Government have advised that plans under the current plan making systems need to:
 - be submitted for Examination before the end of June 2025; and
 - Adopted before the end of December 2026.

- 2.2 The very clear intent is to produce and adopt a local plan under the current plan making system.
- 2.3 In tabular format (Gantt style) a chart is set out below/over the page setting out proposed key stages of work to take the local plan to submission for Examination. The emphasis in this chart is placed on the dates of key reports to committee and proposed public consultation that follows. Substantial levels of additional work will sit behind these public facing aspects of plan making and there are a significant number of dependency links through and across the many separate work areas.
- 2.4 The table takes the plan making work from this committee meeting, at the end of October 2023, through to a point of plan submission in May 2025, this submission date being ahead of, but not substantially so, the deadline of the end of June 2025. It is seen as a credible timeline to follow given the scale and complexity of work ahead. There may be some, but limited scope, to move a little quicker which potentially could allow for a slightly earlier submission (perhaps a month or two earlier) but given the scale of work required and lead in times (including for committee papers) making substantially quicker progress is not seen as a realistic proposition. It should be noted that as currently set out Publication consultation would be across the Christmas 2024/new year 2025 break.
- 2.5 One key risk to meeting this timetable is staff resources. The team currently has a vacant Planning Officer post and despite recently advertising the post it was not possible to recruit to the post. We are currently considering options including sending work out to consultants or bringing in agency planners to help to support the work of the team. Such measures will be necessary in order to keep to the timetable set out in this report.
- 2.6 A key early focus of work is preparation of material for additional consultation under Regulation 18 of the plan making regulations. As highlighted in the September Committee report we envisage a series of reports that will be made available for public comment in respect of the following subject matters:
- Employment allocations
 - Potential new housing or other allocations
 - Clyst Valley Regional Park Boundary
 - Green wedges
 - Coastal Preservation Areas
 - Designated Neighbourhood Area housing requirements
 - Town centre retail boundaries
- 2.7 The intention is that these reports with maps and other supporting papers included, where appropriate, will come to the 5 March 2024 committee meeting (if not before in some cases) and consultation, subject to committee approval, will run, for six weeks, into April 2024. Whilst consultation is being undertaken, and after that the subsequent analysis of feedback, work will carry on with other evidence gathering and analysis and assessment work. We will also, in and through 2024, bring redrafted chapters of the

local plan to committee (starting with chapters that the above consultation does not relate to) seeking approval for suggested amended wording to feature in a first working draft of the proposed Publication plan.

Proposed table of key work stages to take the East Devon Local Plan to Submission for Examination (X indicates where a committee decision will be sought)

Key work stages	2023			2024												2025						
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	
Committee approval of this work plan (31 Oct 2023)	X																					
Ongoing evidence work and preparing Reg 18 consultation documents																						
Reports on emerging evidence as it becomes available																						
SPC approval of Reg 18 consultation																						
Reg 18 consultation																						
Officer assessment of representations received																						
Feedback on consultation to committee																						
Ongoing evidence and assessment work																						
Redrafted chapters to committee as below:																						
Ch. 1 introduction and Ch. 2 vision																						
Ch. 7 Climate change and Ch. 8 Housing																						
Ch. 10 design and Ch. 11 transport																						
Ch 15. heritage, Ch 16. community																						
Ch. 13 biodiversity and Ch. 14 open space																						
Ch 12. Landscape and Ch 19. Glossary																						
Ch 5. and Ch 6. development allocations and Ch. 9 economy																						
Ch 3. spatial strategy and Ch 17. implementation																						
Final redrafting of the proposed Publication Plan																						
SPC approval of Reg 19 Publication plan																						
Publication plan consultation																						
Officers summarise and collate submissions received																						
Council approval of plan submission																						X
Submission of the plan for Examination																						X

- 2.8 It should be noted that the above table and timelines include only limited selected stages of work, specifically redrafted chapters and those geared around reports to committee seeking approval for consultation and the subsequent periods of consultation that thereafter follow. Behind these timelines there is a much fuller project plan which addresses the full spectrum of evidence and assessment work that is being undertaken and the linkages between and across these full work areas. Current workloads, through to early in the new year, are dominated by ongoing assessment and evaluation work of potential site allocations. This work will inform final recommendations on sites to be allocated for development.
- 2.9 The intention is that redrafted chapters will come back to committee starting in February 2024 and will progressively come through in blocks of chapters each month. We have provided a guide to a possible programme of when chapters may come to committee though this schedule is liable to change and be subject to refinement. It is stressed that chapters of the plan that allocate land for development are likely to come to committee in August and September 2024, as is Chapter 3 the Spatial Strategy chapter. It is also highlighted that the existing chapters 4 and 18 will not feature in the next draft of the plan. These chapters included specific materials for the draft plan consultation and so are not referenced in the table. It should be noted that there may be a case for splitting some chapters in the draft plan or otherwise moving the location of some policies in the plan, though our expectation is that any such changes will be limited. In due course chapter renumbering will be undertaken but at this point references are to chapter numbers in the draft plan. Very importantly it is also highlighted that there are likely to be some gaps in some draft chapters that come to committee in the first half of 2024, given that evidence work is ongoing and information to provide full content will not be in place until later in 2024.
- 2.10 In the summer of 2024 the intent is that all work streams will be drawing to conclusions to allow for a proposed Publication plan to be produced/finalised and for this to come to Strategic Planning Committee in November 2024 with a recommendation seeking approval for consultation under Regulation 19 of the plan making regulations alongside the supporting evidence documents. The consultation that follows needs to be for a minimum of six weeks though with consultation scheduled to run over the Christmas/new year period a longer consultation is likely to be appropriate; it is suggested that it should run for eight weeks. One of the fundamental challenges in preparing the plan will be having completed housing monitoring data from year ending 31 March 2024 and following on from this is the task of assessing projected house building delivery and ensuring levels of development match or exceed housing need numbers. The earliest that this work can be expected to be completed is in September or October 2024 and this means that a November 2024 committee date for the Publication plan is the earliest realistic date to work to. The consequence is an across Christmas/new year consultation. If we waited until the new year to start consultation it could prejudice meeting future deadlines, specifically including Submission of the Plan for Examination by the end of June 2025.
- 2.11 Following the above stages of work would allow for comments received to be assembled and summarised and any final tasks to be completed before coming back

to Strategic Planning Committee, and Full Council, seeking authority to submit for Examination. Under the timetable set out we would envisage this to be in May 2025.

- 2.12 It is reiterated that the proposed timetable is tight and it does depend on work progressing in a timely and smooth manner and the necessary staff resources being available. Any significant changes in policy direction or substantial deviation from the form and format of the draft plan as currently drafted could delay production. A consequence and risk that is explicitly highlighted is that delays could push the plan making timeline beyond a June 2025 submission date. This may mean that we could not progress with the plan under the current system and may have to work to the new plan making system, if this were to happen it is unclear how much of the work undertaken to date could be rolled forward and regardless of this it would be expected that there would be substantial delays on getting a new plan in place.

3. Proposed new Local Development Scheme

- 3.1 Following on from and bearing in mind the above reporting on plan making timelines now is an appropriate point in time to update the Council's Local Development Scheme.
- 3.2 The new proposed LDS is appended to this report and it identifies the fact that we are producing a new local plan and it sets out key stages of work and timing for these stages. The new LDS lists other Development Plan Documents that exist and provides an overview of, and advises on, relevant planning policy work undertaken by outside partners, to include Devon County Council, in respect of waste and minerals plans and local communities in respect of Neighbourhood Plan making.

Financial implications:

There are no direct financial implication resulting from the report.

Legal implications:

There are no legal implications requiring comment.

Appendix to the Local Plan committee report of the 31 October 2023, on local plan making timetable, setting out a proposed new Local Development Scheme

The proposed text of the new LDS is set out below. Subject to committee and Council approval it will be tidied up into pdf pamphlet format, given a front cover, index page and contact details and placed on the planning policy pages of the Council web site.

It will have a similar format/presentational style as the existing LDS – see: [lds-april-2022.pdf](https://www.eastdevon.gov.uk/lds-april-2022.pdf) ([eastdevon.gov.uk](https://www.eastdevon.gov.uk))

Introduction

This East Devon District Council Local Development Scheme (LDS) sets out a programme and timetable for production of future planning policy documents by the Council.

East Devon District Council has resolved that this new LDS should take effect from date to be inserted once agreed. This LDS covers the time period from October 2023 through to the end of 2026, it is envisaged however that it will be revised and superseded before this end date.

The stages in Development Plan Document preparation

Development Plan Documents (DPDs) sit at the top of the hierarchy of District Council planning policy documents, on adoption they form part of what is defined as the Development Plan. The term 'local plan' is often used interchangeably with DPD and the Council has an adopted plan (which is a DPD) called the 'East Devon Local Plan'.

DPDs are of fundamental importance in respect of informing prospective developers of the types of development and locations for development that are likely to be appropriate and they are the key policy documents used in determining planning applications. DPDs also inform communities, infrastructure and service providers and other council and wider service providers of development proposals. There are specific legally defined procedural steps that need to be complied with by the Council in order to produce a DPD, some of these are referred to in this LDS, however for a more complete picture see: The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), noting that future changes may be made:

<http://www.legislation.gov.uk/ukxi/2012/767/contents>

In this LDS we set out dates for undertaking key stages in production of DPDs; the stages we report on are summarised below:

Issues Consultation – this is the starting point where comments on general issues and plan scope are sought. At this stage of plan making potential options and alternatives for development may be identified.

Draft plan – this is where a draft version of the plan or some other consultation document or documents are produced and feedback is sought.

Publication – this is the plan that the Council intend to submit for examination. The plan is made available and formal objections and other responses are sought from at this stage. Anyone can comment.

Submission – the publication plan, the evidence supporting the plan and the formal responses to the plan are submitted to the government who appoint an independent inspector to consider the soundness of the plan. The examination of a plan, carried out by a Planning Inspector, starts at plan submission.

Inspector's Hearings – as part of the examination process there will typically be hearing sessions at which the Inspector will lead discussion on the contents of the plan, this helps the Inspector prepare their report.

Adoption – the Council receive a report from the inspector and can then, assuming earlier tasks do not need to be revisited, adopt the plan.

It is stressed that the above stages are a much-simplified version of what happens in plan making, however they give an overview of plan preparation timelines. Government plan making regulations and legislation (and other guidance) should be reviewed for a complete picture of legislative processes that have to be followed.

The adopted East Devon Local Plan, the Villages Plan and the Cranbrook Plan

There are now three existing current East Devon District Council adopted DPDs:

- The existing East Devon Local Plan, covering most policy matters across the district, was adopted on the 28 January 2016.
- An East Devon Villages Plan, adopted on 26 July 2018, has a much more narrowly defined remit of defining Built-up Area Boundaries around selected village settlements and it defines retail policy for Beer and Colyton.
- The Cranbrook Plan covers development matters at the new town and was adopted on 19 October 2022.

It should be noted that policies in local plans should be reviewed at least every five years to assess whether they need updating, and the reasons for decision should be published. A formal review of the adopted East Devon Local Plan was undertaken in 2020.

Future Development Plan Documents in East Devon

This LDS sets out that, from 2023 to 2026, there will be one further DPD that will be produced by the Council, summary details with dates set against key stages, are set out below. It should be noted that the dates (year and months) provided are based on what we currently know or best estimates, changes over time are, however, possible.

a) **Future East Devon Local Plan** – the expectation is that this plan will address all Development Plan matters, potentially other than at Cranbrook, that fall to the responsibility of East Devon District Council. The following forms the timetable for production:

- Issues Consultation – completed in January 2021.
- Draft plan – the first consultation was completed in January 2023 and there is further consultation planned for March/April 2024.
- Publication – consultation projected for December 2024/January 2025.
- Submission – Spring 2025.
- Inspector’s Hearings – 2025/2026.
- Adoption – Mid/late 2026.

Other policy documents identified for production

In addition to DPDs the Council also produce a number of additional policy documents. Of greatest importance in respect of determining planning applications are Supplementary Planning Documents (SPDs). SPDs are intended to provide more detail on the use and implementation on policies in DPDs. Procedures for producing SPDs are set out in legislation and regulations and the Council has a protocol for SPD production, see: <https://eastdevon.gov.uk/media/2443645/spd-protocol-adopted-by-spc-20-march-18.pdf>

SPDs need to go through two stages of consultation but they are not subject to examination and therefore their preparation is shorter and simpler than DPDs; but they do not carry the same weight in decision making.

The Planning Policy team of the Council may also produce further guidance and advice to support and promote development and promote wider social and environmental objectives. Such guidance will not have the formal status of an SPD but we will often look to follow similar processes in production.

Community Infrastructure Levy - Charging Schedule

In East Devon a financial charge, called a Community Infrastructure Levy (CIL), is placed on certain types of new development (most notably new housing) and monies raised are used to help pay for infrastructure that is needed to support development.

In order to be able to charge CIL the Council had to produce a charging schedule that is supported by financial viability assessment evidence, undertake consultation and take the work to Examination by an independent examiner. In this respect production of the CIL charging schedule follows a similar path to that for DPDs (but under separate legislation). The current charging schedule was approved in 2020 and applied from 1 February 2021.

Neighbourhood Plans

Neighbourhood Plans are produced by local communities and in East Devon they are typically produced at the parish level. Neighbourhood Plans set out policies and proposals for development and in this respect they are similar to DPDs and they follow reasonably similar stages in production (but under separate legislation). Once adopted (the technical term is that they are Made) they also form part of the Development Plan for the District and are used alongside DPDs, SPDs and other policy documents in the determination of planning applications.

For more information on Neighbourhood Plans see: <https://eastdevon.gov.uk/planning/planning-policy/neighbourhood-and-community-plans/>

Waste and minerals planning and Devon County Council work

The responsibility for waste planning and minerals planning in East Devon rests with Devon County Council; they have legal responsibility for producing plans and determining planning applications for these two matters. The County Council adopted a new Devon waste plan in 2014 and adopted a new minerals plan in 2017. For more information see:

<https://www.devon.gov.uk/planning/planning-policies/minerals-and-waste-policy>

The adopted waste plan and adopted minerals plan are also part of the Development Plan for East Devon.

Report to: **Strategic Planning Committee**

Date of Meeting: 31 October 2023

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



East Devon Local Plan – A proposed new vision

Report summary:

This report sets out a proposed vision for inclusion in the East Devon Local Plan to replace that which featured in the draft plan. This change was prompted by discussion at Strategic Planning Committee on the 21 July in response to a feedback report on the draft plan consultation. Members requested a workshop session to consider the vision for the plan and this was held on the 31 August. Following that session officers have considered the thoughts of Members from that meeting and the exercises undertaken and produced a revised vision. Through this report Members views are sought on the proposed revised vision.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

1. That Committee endorse the proposed vision as set out in this report and agree to its inclusion in the East Devon Local Plan.
2. That Committee consider whether the new Local Plan should include a vision for each of the towns to act as a focus for the plans approach to each of these locations.

Reason for recommendation:

To replace the vision in the existing draft local plan with a more locally relevant, forward looking and spatially defined vision that is more directly relevant to East Devon and its future.

Officer: Ed Freeman – Assistant Director, Planning Strategy and Development Management, e-mail – efreeman@eastdevon.gov.uk, Tel 01395 517519

Portfolio(s) (check which apply):

- Climate Action and Emergency Response
- Coast, Country and Environment
- Council and Corporate Co-ordination
- Democracy, Transparency and Communications
- Economy and Assets
- Finance
- Strategic Planning
- Sustainable Homes and Communities

Tourism, Sports, Leisure and Culture

Equalities impact Low Impact

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Climate change Low Impact

Risk: Low Risk;

Links to background information

The consultation draft local plan from November 2022 and other local plan papers can be viewed at:

[Draft Local Plan Consultation - East Devon](#)

Links to other background documents, if identified, are contained in the body of this report.

Link to Council Plan

Priorities (check which apply)

- Better homes and communities for all
- A greener East Devon
- A resilient economy

1. The role of a local plan vision

1.1 A local plan vision may be looked upon as setting out an aspirational picture of what an area should look like and how it should function in the future. The National Planning Policy Framework (NPPF) advises at paragraph 15 that:

*“The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide **a positive vision for the future of each area**; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”*

1.2 The Planning Advisory Service (PAS) expand on this by saying:

“Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places.”

And PAS continue by advising:

Developing a vision for the local plan involves looking ahead to what your area will be like in 15-20 years’ time, and may include some or all of the following elements:

- *A direction of travel as to how the plan area will evolve.*
- *The general location of where development will take place and where it will not.*
- *What the nature of development activity should be in key parts of the plan area.*

- *How levels and types of development will be accommodated, both within the short and long term, in specific areas, such as town centres, and in the most sustainable way.*
- *Reference to the wider context of the plan area, introducing the importance of links to and co-operation with neighbouring authorities.*

1.3 The vision can therefore be seen as a scene setting statement that seeks to set out what East Devon is like now but more importantly, under the implementation of local plan policy, what it should be like in the future. The vision should underpin the objectives of the plan, its strategy and its policies and as such will help shape the future and help bring it about.

2. The current draft local plan vision

2.1 The vision in the draft local plan is drawn directly from the current Council Plan (a plan now in the early stages of being superseded by a new plan) and it advises at paragraph 2.3:

“Drawing directly from the Council Plan the local plan vision is:

To make a positive difference to residents’ lives and our environment in East Devon.

With three priorities:

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

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

A Resilient Economy bringing prosperity to the district”

2.2 In consultation feedback the vision was, however, challenged on the basis of matters to include:

- Not being spatial in nature
- Not being specific and clearly about East Devon (it’s been suggested it could apply to anywhere)
- Lacking in ambition
- Failing to consider how East Devon residents see their area, why they value and enjoy it, and wish to live in and visit it
- Being based on a Council Plan that is time limited and which will soon be out of date
- Not taking into account the district’s - strengths, weaknesses, opportunities and threats.

2.3 It is, therefore, timely to review the draft plan vision and to consider what a new refined and refreshed vision may look like.

3. Member vision workshop

- 3.1 On the 31 August 2023 there was a half day member visioning workshop where the above themes and matters were discussed, and members were invited to set out their understanding of East Devon right now and their views and aspirations for the district in the future.
- 3.2 Part of the work on the day involved a SWOT analysis of the district (SWOT = Strengths, Weaknesses, Opportunities sand Threats). This analysis highlighted the following key issues:

Strengths

- Beautiful natural environment including nearly two thirds AONB
- High quality coastline including Jurassic coast world heritage site
- Good transport links to wider country and the world via road, rail and air
- High levels of home ownership
- Reasonably well off being in the 40% least deprived districts nationally
- High average life expectancy
- Low levels of unemployment
- High levels of qualifications among residents
- Strong tourism sector
- Attractive towns and villages with many listed buildings, conservation areas and tourist attractions

Weaknesses

- High levels of out commuting to Exeter and wider area to work, study etc.
- High levels of car ownership and dependency due to rural nature of much of the district and poor public transport for local journeys
- Big disparity between house prices and wages making homes unaffordable to many of working age
- Older age profile impacts on health care, labour market and economic growth
- Some significant pockets of deprivation in Exmouth and Honiton
- Dispersed rural population restricts access to services and facilities
- Poor rural connectivity to broadband
- Coastal communities exposed to coastal change impacts

Opportunities

- Significant opportunities for nature recovery and to join up delivery with BNG, delivery of SANGS etc.
- Improvements to water quality and protected habitats
- Increased home working has reduced commuting and retained spend in local communities
- Protection and enhancement of heritage assets
- Growth in the west end of the district has led to substantial inward investment and prosperity
- Potential to plan positively to meet the needs of residents for specific types of housing
- Opportunities to benefit from proximity to Exeter in terms of further economic growth

Threats

- Lack of available brownfield sites puts pressure on the countryside to accommodate growth needs
- River Axe SAC under threat from phosphate pollution
- Increased likelihood and severity of flooding due to climate change
- Increased risks of coastal erosion due to rising sea levels
- Deterioration of water quality in some water courses and coastal areas
- Increased commercialisation of agriculture posing threats to the natural environment
- Ever increasing pressures on infrastructure
- Limited space to accommodate development threatens the natural environment
- Loss of community facilities due to economic pressures
- Ability to deliver affordable housing that meets the needs of local people

3.3 The visioning work was also augmented by a 'Postcard from the Future' exercise in which the opportunity was presented to participants to set out, in personalised postcard format, a view of what East Devon (or favoured parts) would be like in the future – writing back to the present day. The thoughts of Members through this exercise have helped to inform the proposed revised vision.

4. The proposed new local plan vision

4.1 Drawing on the work of the visioning session, best practice and national guidance, officers have drafted a new vision suggested for inclusion in the local plan to replace and supersede that set out in the draft consultation plan.

4.2 The proposed new vision is set out below. It extends to beyond 2040 and it sets out a locally distinctive and aspirational vision for what we feel East Devon should be like in the future under the local plan.

By 2040 and beyond East Devon will be a diverse, inclusive and thriving place to live and work in and also to visit and enjoy. We will ensure our towns and villages continue to be great places to live as they grow to meet future needs whilst sustaining strong relationships with the adjacent city of Exeter and our other neighbours.

The western side of East Devon will remain a focal point for growth with Cranbrook now well established and thriving and our second new town expanding rapidly to meet the needs of a growing population. Alongside additional housing new high technology green businesses will continue to invest in the western side of the district securing high quality jobs and training. This development will come forward in an outstanding natural setting created through the expanded and expansive Clyst Valley Regional Park.

At our long-established towns and villages there will be a focus on meeting local and affordable housing needs but still recognising that East Devon will be a place that others will

want to move into. New, improved and adapted housing will give choice of tenure and location with adaptable housing supporting local communities.

Our town centres will form a focal point for business, social and community activity serving residents and visitors alike. We will secure well-paid jobs in both traditional and emerging new sectors closing the gap between average earnings and house prices and improving the self containment of our communities by creating more job opportunities close to where people live.

Rural East Devon will retain its outstanding charm and character with modest sensitively planned development to meet the needs of the local communities. Farming and traditional rural activities will still dominate the use of land though with an emphasis on retaining high quality agricultural land where possible and moving towards more environmentally sustainable farming practices as we reach the middle decades of the 21st century.

Across East Devon new development will draw on our outstanding heritage legacy but also will be forward looking to incorporate net zero carbon technologies in new buildings and built spaces. New, expanded and improved physical, social and community facilities and infrastructure will be delivered alongside growth ensuring that people live healthier and happier lives with greater access to services and facilities in a cleaner and greener setting. High quality urban spaces will link in with Green Infrastructure, open space and recreational facilities which will support the health and well-being of our communities.

Our beautiful and diverse countryside, Areas of Outstanding Natural Beauty, world class Jurassic coast, nature reserves and built heritage assets will remain and be enhanced. We will ensure that alongside new development there is greater care of the natural world with biodiversity improvements and a far richer and more nature friendly tapestry of green spaces in the future.

We will continue to play our part in what will now be an increasingly net zero carbon world and at a local level we will be fully decarbonised. Minimising energy consumption and maximising renewable energy generation will be core to our lives whilst communities in East Devon will be adapting to changes brought about by a warming climate.

- 4.3 In setting out a vision we may not achieve everything, in the best way possible, that we aspire to, but we do want to set the bar high.
- 4.4 From this overall vision for East Devon we will look to refine, though not substantively change, the objectives of the draft plan and thereafter selectively review and refine matters of and around plan strategy and plan policies.
- 4.5 At the Member workshop there was a suggestion that the plan should include visions for each of the towns. This is something that is included in the current Local Plan but had not been included in the draft of the new plan. It is thought that when considered alongside the wider vision these may help to explain in brief the intentions of the plan and ensure that together the visions are truly locally specific. Members views are sought on this approach.

Financial implications:

There are no direct financial implication resulting from the report.

Legal implications:

There are no legal implications requiring comment.

