

Agenda for Strategic Planning Committee Tuesday, 5th March, 2024, 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)

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This meeting is being recorded for subsequent publication on the Council's website and will be streamed live to the [East Devon District Council Youtube Channel](#).

1 Minutes of the previous meeting (Pages 3 - 13)

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 Local Plan Timetable Update Report (Pages 14 - 22)

This report advises on an update on work on local plan making and summarises progress on key work streams.

8 Consultation on Housing Sites (Pages 23 - 65)

- 9 Topic Paper relating to Town Centres, Retail and Sequential Test in the new Local Plan (Pages 66 - 147)

Members are asked to consider this topic paper which explains the proposed approach to be taken and establishing up to date Town Centre Area Boundaries and Primary Shopping Area Boundaries.

- 10 East Devon Playing Pitch Strategy (Pages 148 - 166)

This report provides details of work to date on production of the Playing Pitch Strategy for East Devon.

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Members of the public exercising their right to speak during Public Speaking will be recorded.

[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 13 February 2024****Attendance list at end of document**

The meeting started at 10.00 am and ended at 2.13 pm. The meeting was adjourned at 12.15 pm and reconvened at 12.30pm and adjourned for lunch at 12.55 pm and reconvened at 1.32 pm.

60 Minutes of the previous meeting

The minutes of the Strategic Planning Committee held on 9 January 2024 were confirmed as a true record.

The Assistant Director – Planning Strategy and Development Management updated Members on Minute 55; Resolution 3 from the meeting held on 9 January 2024 advising that the pending technical guidance from the Department of Levelling Up, Housing and Communities had now been received which confirmed the council was only required to demonstrate a four-year housing land supply instead of the five-year which meant that the council no longer needed to apply the tilted balance when considering planning applications.

61 Declarations of interest

Minute 65. Designation of Green Wedges in the new Local Plan.
All Members of the Strategic Planning Committee advised receiving various lobbying communication on this item.

Minute 65. Designation of Green Wedges in the new Local Plan.
Councillor Dan Ledger, Affects Non-registerable Interest, Owns property in Seaton directly opposite to a Green Wedge.

Minute 65. Designation of Green Wedges in the new Local Plan.
Councillor Mike Howe, Affects Non-registerable Interest, Bishops Clyst Parish Councillor.

Minute 68. Cranbrook Town Centre Masterplan.
Councillor Kevin Blakey, Affects Non-registerable Interest, Cranbrook Town Councillor and a resident of Cranbrook.

Non-Committee Members

Minute 65. Designation of Green Wedges in the new Local Plan.
Councillor Paul Arnott, Affects Non-registerable Interest, Colyton Parish Councillor.

Minute 65. Designation of Green Wedges in the new Local Plan.
Councillor Peter Faithfull, Affects Non-registerable Interest, Ottery St Mary Town Councillor.

Minute 65. Designation of Green Wedges in the new Local Plan.
Councillor Ian Barlow, Affects Non-registerable Interest, Sidmouth Town Councillor.

Minute 65. Designation of Green Wedges in the new Local Plan.
Councillor Geoff Jung advised receiving various lobbying communication on this item.

Minute 68. Cranbrook Town Centre Masterplan.

Councillor Kim Bloxham, Affects Non-registerable Interest, Cranbrook Town Councillor and a resident of Cranbrook.

62 **Public speaking**

Rachel Creasy, a resident of Budleigh Salterton spoke on the Designation of Green Wedges in the new Local Plan report, who along with local residents strongly objected to the removal of the Green Wedge for Area 3 and to any consequential development.

Concerns were raised that if the Green Wedge was removed from the west side of Budleigh Salterton and a high density development was positioned close by it would have an overbearing and intrusive effect on the area. In the assessment it was suggested that Site A would be obscured from public view – this was misleading as areas 3 and 5 are elevated and any development would be visible.

Areas 1, 3 and 4 would close the separation of the Green Wedge between Budleigh Salterton and Knowle and the proposed reduction would not be sufficient, Site A would generate additional traffic problems to an already bottleneck single land entry point.

An increase in housing would also put a strain on oversubscribed local facilities including the school, GP Practice and public transport.

The following statement on minute 65 – Designation of Green Wedges in the new Local Plan was read out on behalf of Carole Hooper.

I was one of the many who raised concerns during the last consultation, dated January 2023, as the consultation referred to potential development of the prime agricultural land that is behind our house in Knowle Rd – area 2 as per the Budleigh Salterton to Knowle Green Wedge Assessment. I now understand that that the council proposes to reduce the green wedges originally proposed even further, using the rationale that only a small green wedge is required to maintain the gap between Budleigh Salterton and Knowle village.

I consider the role of the green wedges to be much more than that of maintaining a divide between Budleigh Salterton and Knowle village. Green wedges provide an extra layer of protection against building development and help to maintain the landscape and wildlife in the area. Any proposal to reduce the existing green wedges by such a significant amount puts the land and its wildlife at risk. I cannot help distrusting the motives for reducing the green wedges so significantly.

My arguments against the proposal are:

Effectively the reduction of the green wedges between Budleigh Salterton and Knowle village results in a very small portion of land remaining. Rather dramatically Budleigh Salterton will become much closer to Knowle village – what is there to stop further reduction of this gap on the basis that the gap is too small to be worth maintaining?

There appears to be no discussion or awareness of the value that Knowle Rd brings to the AONB. By allowing such a development the beautiful rural nature of the road would be destroyed .

The countryside along Knowle Rd is beautiful with ancient Devon banks and hedgerows that support the local wildlife. On several occasions I have seen polecats and stoats and

other creatures scurrying across the road from East to West, on their way to the area around Knowle Brook (area 9 as per the Budleigh Salterton to Knowle Green Wedge Assessment). Developing the land would result in the loss of this exceptional landscape and all that it represents for our wildlife and to our community.

I am not the only person who thinks in this way. Knowle Rd is a walkers' paradise. Many people walk down the road every day, far exceeding the cars that use the road. It feeds their souls, as it does mine. To lose the unique quality of this road would be like losing a limb! It is a true social amenity and hundreds of Budleigh / Knowle residents would feel its loss acutely.

Knowle Rd is too narrow as it is to allow cars to overtake one another. Without major widening, the road would not be able to safely cope with the additional traffic resulting from development of 4 and 6 of the Budleigh Salterton to Knowle Green Wedge Assessment. Any development changing the road would represent a loss of the wonderful environment that I have already tried to convey to you.

Finally any further erosion of the green wedges between Knowle Village and Budleigh Salterton would represent pursuing the requirement to building new housing without considering the value of what would be lost in so doing. This is equivalent to knowing the cost of everything and the value of nothing.

The following statement was read out on behalf of Sylvia Meller.

Our green wedges are of massive importance not just for flora and fauna but also for us living here. We need some green spaces for our wellbeing as well as for absorbing rain water to avoid flooding. Reducing the area of green wedges and opening up the possibility of being built on will have a huge impact on the whole ecosystem and people living in the area.

I do understand the need for new housing, but we have a lot of derelict buildings as well as brownsites which can be used for new building sites. One thing we do NOT need are more expensive houses which the locals can't afford, without infrastructure - the current problems we have with South West Water show clearly that they are already overwhelmed with the existing situation.

Please keep the green wedges intact and consider creating even more so not just our but also next generations have a chance to live in a place worth living in and with reduced risks of flooding.

The following statement was read out on behalf of Brian Webb.

Budleigh Salterton is within and forms an integral part of the East Devon AONB and includes the River Otter nature reserve an area of Special Scientific Interest (SSSI).

I object to the Green Wedges being removed, reduced or moved, they are just one of the Residents first lines of defence against the concreting over of our wonderful AONB countryside and coastline.

I and many of the local Residents are committed to ensuring that the status quo of the green wedges be maintained, that our environment is protected for the benefit of future generations of both people and animals and that we avoid development that cannot be supported by the existing infrastructure.

The following statement was read out on behalf of Kevin Bates.

I strongly object to any proposal to reduce the size/location of these important areas.

As well as providing a haven for local wildlife the existing green wedges provide for a distinction, and general separation, between Knowle and Budleigh communities. Although the communities are not 100% separated today if the green wedge was to be reduced as proposed, then the two communities would clearly be almost joined, with no separate identity and just a very small physical separation.

The proposed changes would presumably potentially enable future development which would appear to be unsuitable for this area and would certainly not protect the character of this part of the AONB, which is of course a nationally important landscape designation. Within, and around, the existing wedge are Grade 1 agricultural land, areas prone to flooding each year, rural lanes, views and an ancient lane.

The following statement was read out on behalf of Councillor Ray Steer-Kemp for Bishops Clyst Parish Council.

Bishops Clyst Parish Council have recently been made aware of the fact that the Strategic Planning Committee is proposing to reduce the present area of 'Green Wedge titled 'East of Exeter and south of the A30'

The proposal is to reduce the 'green wedge' area which runs from south of Clyst St George up the Clyst Valley to Sowton and the A30 to the north and replace it with just the small area of flood plain between Clyst St Mary and the motorway. The existing area of green wedge is an essential buffer between the east of the district and Exeter and safeguards the River Clyst Regional Park.

At their meeting on 12 Feb the Parish Council expressed their strong objection to the proposal and their wish that the present 'green wedge' remains as existing.

The following statement was read out on behalf of Councillor Mike Galloway for Bishops Clyst Parish Council.

As the Parish Councillor for Sowton, I must on behalf of Sowton Village and Clyst St Mary lodge a strong objection to the proposed alteration to the existing Green Wedge shown on pages 47 & 48 in the Public Reports Pack.

The only reason for the alteration is to release the area of land designated Sowt 09 from the existing Green Wedge and perhaps this should be looked at as a separate issue with respect to Green Wedge.

Removal of the Green Wedge will remove the protection to Sowton and Clyst St Mary and logic for the proposal should be revisited and any decision should involve the views of the local population affected by the Emerging Local Plan.

Councillor Ian Balow, spoke as a member of the public on the current planning strategy and asked Members to consider whether the council can require officers to do the following on all major planning application:

- To include at least one local ward member and one member of the Planning Committee to attend any pre application meeting or discussions alongside officers; and
- To no longer accept comments from consultees who support applications if the comments clearly show they need to be challenged.

Councillor Geoff Jung speaking as Portfolio Holder for Coast, Countryside and Environment raised concerns about how the council was proposing to reduce over 70% of Green Wedges and drew Members attention to the fourth bullet point of the action plan for the Climate Change Strategy 'Protecting and enhancing the natural environment'. Residents see Green Wedges as the 'green lungs' of our wildlife areas and by reducing the Green Wedges by this magnitude will send out the wrong message that this council does not care about environment protection. Our countryside is our number one asset.

Councillor Jung advised Members there was a vital need to produce a Green Infrastructure Strategy that could sit alongside the Local Plan as a Supplementary Planning Document but was advised this could not be undertaken due to resourcing issues and questioned how to tackle the reduction of our Green Wedges.

63 **Matters of urgency**

There were no matters of urgency.

64 **Confidential/exempt item(s)**

There were no confidential or exempt items.

65 **Designation of Green Wedges in the new Local Plan**

The Committee considered the Assistant Director – Planning Strategy and Development Management's report which sought endorsement of the proposed methodology for defining Green Wedges that Members agreed in principle at the meeting on 3 October 2023.

A summary of the proposed changes, the methodology and resulting full assessment were detailed in the appended appendices where in most cases it was proposed to reduce the size of the current Green Wedges. The Assistant Director – Planning Strategy and Development Management advised that although many of the Green Wedges had been carried over from previous Local Plans this cannot be relied upon in the new Local Plan as the constraints of the district will make it increasingly difficult to find suitable sites for development and there is significant risk of challenge at examination if they are carried over again. It is important to have clear robust evidence that will identify areas designated as Green Wedges and the need to show that land is not being protected simply for the sake of it and to show there is a real purpose for the Green Wedges.

Strategy 8 in the adopted Local Plan states 'that within a Green Wedge development will not be permitted if it would add to existing sporadic or isolated development or change the individual identity of a settlement or could lead to or encourage coalescence'. This wording leads to assessments being taken on a case by case basis to determine whether the Green Wedge would be harmed. However, the proposed wording for the Green Wedge policy in the new Local Plan would take away this uncertainty and would prevent development within the Green Wedges unless there was an essential need that could not be located elsewhere.

The Assistant Director – Planning Strategy and Development Management advised it was important to remember that areas where Green Wedges were being proposed to be removed would still be protected as open countryside and in some cases other protections would apply such as Areas of Outstanding Natural Beauty (now National

Landscapes) and flood zones. It was also advised that additional benefits of designation such as for recreational purposes, landscape protection and habitat protection purposes would be best dealt with by other policies and included in the new Local Plan and should not be reasons for designating as a Green Wedge. These could be dealt with by a Green Infrastructure Strategy or a Local Nature Recovery Plan.

Points raised by Members during discussion included:

- Green Wedges are needed to prevent urban sprawl by keeping land permanently open.
- The concerns raised by Members at the Strategic Planning Committee meeting on 3 October 2023 have not been implemented in this report.
- There is no mention of the assessment of Green Wedges already in neighbourhood plans. Ottery St Mary Neighbourhood Plan specifically states their Green Wedge which could not be removed.
- It was suggested that the report did not provide Members with sufficient information to truly make an informed decision.
- The maps and images are incorrect and arrows are facing the wrong way.
- The methodology does not take into account the loss of character and essence of a place.
- Support was expressed that the green spaces of special interest would still be protected.
- It was questioned why Green Wedges were proposed to be removed in flood areas.
- It was reported there would be a net loss of 75.7% of our current designated Green Wedges with only one existing Green Wedge remaining the same. Whimple would see a 47% net loss, Budleigh Salterton 70%, Exmouth and Lymington 84% and West Hill and Ottery St Mary 84%, Clyst St Mary at 99% and the worst affected would be Poltimore which loses its protection entirely.
- Reference was made to the minutes of the meeting held on 3 October 2023 where Members had raised concerns about the evidence criteria that focused heavily on the visual impact on landscapes when in reality the impact would need to focus on more than what can be seen. There is no wording at all in the current report that reflects these comments.

Councillor Todd Olive advised that as the existing Green Wedges had been looked at by external experts including the Planning Inspectorate on three separate occasions including on adoption of the 1995 – 2011 Local Plan and at the adoption of the current Local Plan 2013 – 2031 there is no reason to cut it to pieces and proposed the following motions which were seconded by Councillor Dan Ledger as he believed the methodology was flawed and so much more was needed to protect communities from coalescence.

1. That Strategic Planning Committee cannot agree that the draft Green Wedges as presented are drawn in accordance with the intent of the Committee or with the spirit of the proposed policy.
2. That the Assistant Director for Planning Strategy and Development Management, in review of the proposed boundaries in light of the issues raised by Committee and bring a revised proposal with relevant evidence back to Committee as soon as possible for consideration prior to Regulation 18 consultation.
3. That the Assistant Director for Planning Strategy and Development work with the Portfolio Holders for Strategic Planning and Coast, Country and Environment, as well as relevant Assistant Directors, to scope the potential approach to a new Countryside and Green Infrastructure Strategy and Supplementary Planning

Document and bring a proposal back to Strategic Planning Committee at the appropriate time.

Further points raised included:

- The assessments have not been completed in an efficient and robust way and they clearly have inconsistencies.
- There is a need for an electronic mapping system.
- It was suggested that the Committee had been ambushed with the changes to the Green Wedges and that they are important to protecting our countryside.
- The methodology does not address the aspirations of residents and its imperative that the Green Wedges are kept.
- Support was expressed for the motion made by Councillor Olive as it reflected Members views.
- Support was expressed for a workshop to focus on the wording of the Green Wedge Policy and an invite should be sent to all Members.
- Section 144 of the NPPF suggests that this council qualifies for Green Belts. There is a need to encompass Green Belts in larger developments.

In response to all the points raised the Assistant Director – Planning Strategy and Development Management advised it was not officers' intentions to blindside Members and suggested that perhaps Members misunderstood the likely outcome of the methodology which was agreed by Members. He acknowledged that the report needed tidying up and reformatting but thought Members would prefer to input into the draft work as soon as possible and that it was important they did in order to keep to the timetable. He advised that officers could look at the methodology again but they would need a clear steer from Members highlighting exactly where it was incorrect. The Assistant Director – Planning Strategy and Development Management was happy for Members to attend a workshop session which could include Planning Officers to go through individual areas.

In light of the comments received Councillor Todd Olive proposed the following revised motions which was seconded by Councillor Dan Ledger.

1. That Strategic Planning Committee cannot agree that the draft Green Wedges as presented are drawn in accordance with the intent of the Committee or with the spirit of the proposed policy.
2. That the Assistant Director for Planning Strategy and Development Management in consultant with the Chair and Vice Chair of Strategic Planning Committee, urgently review the methodology, proposed policy wording and proposed boundaries in light of the issues raised by Committee. With particular regard to accounting for non-visual, intrinsic settlement separation and with input from Ward Members and bring a revised proposal with relevant evidence to a workshop with all Committee Members invited, with conclusions and recommendations brought back to Committee as soon as possible for consideration prior to Regulation 18 consultation.
3. That the Assistant Director for Planning Strategy and Development Management work with the Portfolio Holders for Strategic Planning and Coast, Country and Environment, as well as relevant Assistant Directors, to scope the potential approach to a new Countryside & Green Infrastructure and Supplementary Planning Document and bring a proposal back to Strategic Planning Committee at the appropriate time.

4. That a report be brought to Committee as soon as possible setting out the options of exploring a Green Belt designation in the West End of the District.

The Assistant Director – Planning Strategy and Development Management sought clarification from Members about what they wanted to achieve from the workshop. Members advised the workshop should be to consider the methodology and that this should be arranged as soon as possible. The Assistant Director – Planning Strategy and Development Management advised the workshop would need to be before the next Strategic Planning Committee meeting on 5 March 2024.

RESOLVED:

1. That Strategic Planning Committee cannot agree that the draft Green Wedges as presented are drawn in accordance with the intent of the Committee or with the spirit of the proposed policy.
2. That the Assistant Director for Planning Strategy and Development Management in consultant with the Chair and Vice Chair of Strategic Planning Committee, urgently review the methodology, proposed policy wording and proposed boundaries in light of the issues raised by Committee. With particular regard to accounting for non-visual, intrinsic settlement separation and with input from Ward Members and bring a revised proposal with relevant evidence to a workshop with all Committee Members invited, with conclusions and recommendations brought back to Committee as soon as possible for consideration prior to Regulation 18 consultation.
3. That the Assistant Director for Planning Strategy and Development Management work with the Portfolio Holders for Strategic Planning and Coast, Country and Environment, as well as relevant Assistant Directors, to scope the potential approach to a new Countryside & Green Infrastructure and Supplementary Planning Document and bring a proposal back to Strategic Planning Committee at the appropriate time.
4. That a report be brought to Committee as soon as possible setting out the options of exploring a Green Belt designation in the West End of the District.

Councillors Collins, Fitzgerald, Hartnell and Levine left the meeting.

66 **Designated Neighbourhood Areas Housing Requirement (DNAHR)**

The report before Committee updated Members on the findings from an engagement webinar with town and parish councils and neighbourhood plans groups on their responsibilities for land allocations with regard to the Designated Neighbourhood Area Housing Requirement. Members noted that an online survey had also taken place with 43 parish councils responding summarised at paragraph 5.14. There was a mixed response seeing only 9 parish councils indicated they were likely to make housing allocations.

The Assistant Director – Planning Strategy and Development Management outlined the two preferred options to help keep the method options simple and straightforward which were set out in paragraphs 7.12 to 7.20.

Option 1 – All housing supply forecast for the period 1 April 2020 to 31 March 2040 excluding an allowance for future windfalls (recommended as the preferred option).

Option 2 – All housing supply forecast for the period 1 April 2020 to 31 March 2040 including an allowance for future windfalls (recommended as the rejected option).

The preferred option would replicate the current approach which would give flexibility to communities on whether they want to see growth.

It is proposed that the consultation would include a straightforward summary document detailing the proposed two main options which would include a summary table giving figures for each area and a technical report which would include all options identified and how the district windfall allowance could be apportioned to Designated Neighbourhood Areas.

Questions raised by Members included:

- Clarification was sought on housing allocation numbers if a town or parish council put forward suggested ideas about additional housing and whether this would be added to their housing allocation numbers. In response the Assistant Director – Planning Strategy and Development Management advised additional housing allocation suggestions would be classed as extra. It was explained that it was difficult to account for them any other way as some communities did not want to see growth and some did and yet the Local Plan needs to take a consistent approach notwithstanding this.
- Clarification sought on whether the Regulation 18 consultation would include both the including and excluding windfall sites options. In response the Assistant Director – Planning Strategy and Development Management confirmed these were the two preferred options but the other options would be detailed in the evidence that it is behind the consultation and could also be commented on.

RESOLVED:

1. That the updated information available from the early engagement with parish councils and neighbourhood plan groups to inform consultation on Designated Neighbourhood Area Housing Requirements further to the report on this matter presented to Members in March 2023 be noted.
2. Members agreed that the preferred approach for calculating Designated Neighbourhood Area Housing Requirements for consultation purposes should be based on the housing supply forecast for the period 1 April 2020 to 31 March 2040 excluding an allowance for windfalls.
3. That the proposed approach to Regulation 18 stage consultation on the method selection for calculating Designated Neighbourhood Area Housing Requirements set out in the report be agreed in principle, subject to a technical paper for the consultation including the housing requirement figures for each designated neighbourhood area being agreed by Members prior to the consultation launch.

Councillors Blakey and Jess Bailey left the meeting.

67 East Devon Local Plan - approach to redrafting of local plan chapters an revised chapters 1 and 2 of the plan

The report before Members sought endorsement of the proposed approach to Chapter 1 – Introduction and Chapter 2 – Vision and Objectives of the new Local Plan which reflected Members discussions at the last meeting.

Members noted an updated version of the new Local Plan would be brought back to Committee prior to the Regulation 19 Publication.

RESOLVED:

1. That the approach to making amendments to the Local Plan set out in the committee report be endorsed.
2. That the new proposed working draft text for Chapters 1 and 2 of the Plan be endorsed, noting that further minor refinements may be needed later in 2024 and will be brought to Members as part of the Regulation 19 Publication Draft version of the Plan.

68 **Cranbrook Town Centre Masterplan**

The Assistant Director – Planning Strategy and Development Management presented the report that sought approval to produce a Cranbrook Town Centre Masterplan. He updated Members on the community responses to the consultation regarding the future of the town centre and Members noted the excellent response rate received from residents which was summarised in paragraph 2.3 expressing some excellent ideas to what they would like to see. These responses would then progress to producing a masterplan for the town centre.

Comments from Members included:

- The Chair thanked the residents of Cranbrook for their contributions to enable the Masterplan to progress which he was confident would reflect the views of residents.
- The Chair was pleased to see support for active travel and support for a leisure centre and provisions for cycling and walking.
- Clarification was sought on the timescale for the Masterplan. The Assistant Director – Planning Strategy and Development Management confirmed that he hoped it would be completed by August 2024, acknowledged the need for a project plan and timetable to be developed and said he was happy for the Strategic Delivery Board to oversee the project.
- It was suggested that the Chair and Vice Chair, supported by the Ward Members, should have regular updates about the Masterplan so that pitfalls can be addressed early.
- Members were in support of the Strategic Delivery Board to oversee the Masterplan.

RESOLVED:

1. That the outcomes of the Cranbrook Town Centre consultation be noted.
2. That the production of a Cranbrook Town Centre Masterplan be approved and brought to the Strategic Delivery Board to oversee so that any pitfalls could be addressed early before completion in August 2024.

Attendance List

Councillors present (for some or all the meeting)

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
H Parr

Councillors also present (for some or all the meeting)

P Arnott
I Barlow
K Bloxham
C Brown
J Brown
R Collins
P Faithfull
V Johns
G Jung

Officers in attendance:

Ed Freeman, Assistant Director Planning Strategy and Development Management
Anita Williams, Principal Solicitor (Deputy Monitoring Officer)
Wendy Harris, Democratic Services Officer

Councillor apologies:

B Bailey

Chairman

Date:

Report to: **Strategic Planning Committee**

Date of Meeting: 5 March 2024

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



East Devon Local Plan – timetable update report and further plan consultation

Report summary:

This report advises on an update on work on local plan making and summarises progress on key work streams. In summary it is reported that work is progressing broadly in line with plan redrafting timetables albeit the need for a workshop to further discuss green wedges following Members discussion at the previous meeting will cause a delay of at least a couple of weeks in the addendum Regulation 18 consultation being launched with now set to be for early April following the committee meeting on the 2 April.

This report also:

- sets out details of the proposed additional topic specific local plan consultation that is scheduled for March to April 2024; and
- specifically comments in more detail on potential future work on building standards and carbon emissions (such work we highlight would/will delay bringing a revised local plan climate change chapter back to committee).

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

1. That committee note the ongoing work on local plan production as summarised in this update report.
2. That committee agree to the proposed approach to additional local plan consultation in April and May.
3. That committee advise on whether they wish to pursue a policy approach in the new local plan that sets out local plan policy on energy efficiency standards/approaches that exceed those of building regulations.

Reason for recommendation:

To ensure Members of committee are kept aware of local plan making progress.

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 Medium Impact

Risk: Medium Risk; This report contains information around possible policy options that could have differing (though not quantified) Carbon emission impacts.

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 This report provides a follow-on update report on local plan making progress from a similar report to Strategic Planning Committee in January 2024. It follows a pattern of updates being provided every two months.
- 1.2 The emphasis on updating is to:
 - report on key work and tasks being undertaken
 - highlight any concerns about deviation from the timetable, and
 - report on forthcoming reports to committee.
- 1.3 Updating on progress should be seen within the wider context of getting to the Publication consultation stage of plan making to a target date of November 2024 and thereafter to the Submission stage to a target date of May 2025.

- 1.4 We are reviewing work progress alongside the timeline chart set out below/over the page. This chart was first presented to committee on 31 October 2023. We would advise of some deviations from this timetable further in in this committee report.
- 1.5 At this February committee meeting (ahead of the March timetabled date) committee has/will receive revised Chapters 1 and 2 of the local plan. We would advise, however, that for reasons set out in more detail later in this report we will not be in a position to have redrafted Chapter 7 - Climate change for the scheduled April committee meeting.
- 1.6 By way of further update we can advise that consultants have been appointed to undertake a whole local plan and Community Infrastructure Levy viability assessment, and tentative work has also started on an Infrastructure Delivery Plan that will support and inform local plan production.
- 1.7 At the time of drafting this committee report an advert has been placed, with responses received, to appoint an agency planner to assist with planning policy work.

Proposed table of key work stages to take the East Devon Local Plan to Submission for Examination

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																						
Council approval of Publication plan for consultation																						
Publication plan consultation																						
Officer assessment of submissions received																						
Council approval of plan submission																						
Submission of the plan for Examination																						

 Green bars indicate key background work and consultation periods
  Red crosses indicate key committee dates (actual dates to be confirmed)

2. Local plan consultation in April and May 2024

- 2.1 Committee will note that on the agenda for this 5 March 2024 meeting there are a series of topic-based papers that we are seeking authority to undertake consultation on in respect of:
- Potential new housing or other allocations
 - Town centre retail boundaries
- Others will follow at the 12th March meeting.
- 2.2 Following Members consideration of green wedge boundaries at their previous meeting a workshop is being arranged to further discuss these issues and this has consequential delays for the proposed consultation. It is now envisaged that the consultation materials will be presented to Members across the 5th March, 12th March and 2nd April meetings with consultation to commence as soon as possible following the 2nd April meeting. The proposed consultation papers considered by committee will need minor tidying-up before completion, for example in respect of standardising page layouts and pagination.
- 2.3 Consultation material will be posted on the Council's communication and engagement software, Commonplace, and it will be viewable on-line and people will be able also to download pdf copies of documents. We will encourage responses to be made through the commonplace platform but will make materials available in other formats for those unable to use the platform and likewise enable responses to be received through other means where necessary. Whilst the consultation material will be kept as simple and engaging as possible there will be background technical documents that will be available that go into considerably more detail on subject matters. We will ask simple and limited questions in the consultation and will encourage on-line responses.
- 2.4 We will publicise the consultation through our web site and newsletters and send out emails to our lists of consultees. As part of our general Neighbourhood Plan making work we hold on-line meetings with parish councils and will look to run such a meeting alongside and during the local plan consultation period.
- 2.5 We would not, however, recommend that public face-to-face meetings or exhibitions are held. The narrow range of issues covered in this consultation would not warrant such events and engagement levels through the commonplace software is now very good. Officers would be available by telephone and e-mail to answer any questions but we do not have the resources to run face to face events and keep the various workstreams for the plan on track as well.
- 2.6 We will, however, seek to give notice to Parish Council's and any other interested party to advise of the consultation so that any third party, should they choose, can organise their own events.
- 2.7 During the consultation period there will be publicity material prepared and sent out. We will focus each week on a different topic matter in terms of online promotion on the web / social media. We will also look to prepare videos, to be posted on subject

matters that are out for consultation. There will be joint working with the communications team at the council on these and wider areas of the engagement work.

- 2.8 After the consultation is completed officers in the Planning Policy team will prepare a feedback report on comments received with summaries of the main themes and issues emerging. Our expectation is that all comments received will be made public and published on our Planning Policy web pages, though redacting of personal details will be needed and comments will be reviewed to ensure any racist, sexist or otherwise unacceptable text is not published.

3. Climate change chapter of the local plan

- 3.1 We specifically wanted to highlight and draw to members attention considerations around the climate change chapter of the plan that are particularly pertinent and that are relevant to not bringing a redrafted chapter to committee in April 2024.

- 3.2 In December 2023 there were three significant Government actions:

- a. Consultation on proposed revision to building standards - [The Future Homes and Buildings Standards: 2023 consultation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation)
- b. Consultation on matters relating to heat networks - [Heat Network Zoning consultation 2023 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/consultations/heat-network-zoning-consultation-2023)
- c. Ministerial statement on acceptability of having local plan polices on building standards on energy matters that exceed building regulations - [Written statements - Written questions, answers and statements - UK Parliament](https://www.parliament.uk/written-questions-answers-statements/written-question/House-of-Commons/2023-12-14/11772)

- 3.3 There is a long established system of building regulations that exists in the UK that set out minimum standards that new developments and redevelopments are required to meet. These address such matters as structural and fire safety, damp proofing, impacts of toxic substances, soundproofing, ventilation, hygiene, drainage, heating, stairs, disability concerns, glazing and electrical safety.

- 3.4 One of the matters addressed through the building regulations is energy efficiency in development. There are minimum build standards that are set out and have to be complied with and through consultation (item a. above) the Government are consulting on somewhat more demanding (more energy efficient) standards. We use the word 'somewhat' advisedly as assessment clearly indicates that the new standards proposed are not as demanding as they could be. Furthermore new buildings are increasingly being built to levels of energy efficiency that exceed existing and suggested new efficiency standards; and therefore predicted carbon emission standards during the operation and use of a building.

- 3.5 Item b. above relates to a more process and procedural consultation about heat networks and how they will be established and governed and rules and regulations that exist within.

- 3.6 Consultation feedback, under delegated authority, has been/will be sent to Government expressing concerns that standards are not demanding enough and greater emphasis should be placed on building efficiency in development.
- 3.7 It is advised that up to late 2023 it has been possible to have planning policy in local plans, for energy efficiency standards, that seeks to exceed standards set out in building regulations. A number of local planning authorities, including in the southwest - Cornwall and Bath and North East Somerset - have such policies in adopted plan. However there are distinct technical challenges in respect of establishing and enforcing such policies and also challenges around the legality of such policies. We understand that in some cases Inspectors have rejected these types of policies at local plan examinations.
- 3.8 The picture of complexity of having local plan policy on building standards that exceed those in building regulations got even more complicated, however, by a ministerial statement issued in December 2023 (reference as item c. towards the start of this section of this report).
- 3.9 The ministerial statement includes text stating *“the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale.”*
- 3.10 The above may be reasonably read to conclude that we are effectively barred from seeking higher standards in our local plan. But the next sentence, on face value, somewhat contradicts what went before by stating *“Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:*
- *That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.*
 - *The additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).*
- 3.11 In our draft local plan [commonplace-reg-18-final-071122.pdf \(eastdevon.gov.uk\)](https://www.eastdevon.gov.uk/commonplace-reg-18-final-071122.pdf) we included Strategy 28 that sought net zero carbon emissions from new development (the adopted Cranbrook Plan has policy coverage that also seeks high efficiency standards). Regardless of the Ministerial Statement Strategy 28 would have required some wording tightening up in redrafting.
- 3.12 But, we would now however wish to gain clarity from Committee on whether they would wish to pursue a local plan policy approach that would seek to exceed existing or new potential building regulations standards. There is a case against seeking higher local standards in that it would appear contrary to Government aspirations and expectations, it will involve some extra work, with no certainty of success, to seriously

pursue such an approach and it might be felt that Government standards do or will go far enough anyway. It is clear that minimum standards now are much more demanding than they were in previous years, heating related carbon emissions from new buildings are lower than from old buildings and there is an argument that consumers, should they choose (and have the money) can buy or rent a property that is more energy efficient than minimum standards anyway.

- 3.13 Arguments for seeking or explicitly imposing higher standards rest on such matters as the fact that even after new standards come into place (assuming they do) developments (such as new homes) will still emit carbon and that we should be doing everything (reasonably) possible to reduce overall carbon emissions. It is also the case that more energy efficient homes will cost less to heat and be more comfortable for residents (but there is a cost to greater energy efficiency).
- 3.14 We would highlight that there is a legal challenge (proposed or perhaps already logged) in respect of the validity of the ministerial statement. Also the Town and Country Planning Association are lobbying for a collective local authority campaign of opposition to the Government ministerial statement position.
- 3.15 Given the above considerations, and pending instruction from Committee, we regarded it as appropriate to hold back on bringing a revised climate chapter of the local plan to committee in April. Should committee wish to challenge the government position, and seek policy for more demanding standards, we would see the need to buy in specialist consultancy advice on this matter.
- 3.16 We would also wish to highlight that it would be appropriate to undertake potentially substantive further work on and relating to Strategy 31 of the local plan that relates to wind energy developments (turbines and wind farms).
- 3.17 The National Planning Policy Framework [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/115271/nppf-2023.pdf) (December 2023) at Footnote 58 advises *“Except for applications for the repowering and life-extension of existing wind turbines, a planning application for wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan or a supplementary planning document; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been appropriately addressed and the proposal has community support.”*
- 3.18 Strategy 31 sets out that “wind energy development will in principle be supported in the identified wind energy suitable area ...”. The Policies Map of the draft local plan colours in such areas (ie they are identified). But there is a question around whether policy wording meets the NPPF tests and more importantly whether we have identified appropriate areas.
- 3.19 The areas identified are taken from a study produced for the Council (and partner authorities) by the Centre for Energy and the Environment at the University of Exeter in 2020 [UoE-2020-Low-Carbon-and-Climate-Change-GESP-report-net-zero-draft-120320.pdf](https://www.exeter.ac.uk/research/centres-and-institutes/centre-for-energy-and-the-environment/wp-content/uploads/2020/06/UoE-2020-Low-Carbon-and-Climate-Change-GESP-report-net-zero-draft-120320.pdf) It was originally for the Greater Exeter Strategic Plan but is now applied for

our local plan work. This work was undertaken at a higher level and areas identified for wind were derived from technical assessment of suitable wind speeds and applying buffers (areas excluded from being defined) around selected physical features and environmental assets – to include (not the full list) - roads, houses, all of the AONBs (now national landscapes), listed buildings, overhead powerlines and woodlands.

- 3.20 On a technical level suitability considerations may have changed since 2020 when the work was completed. But of more significance the definition and application of buffers is not as sophisticated as would ideally be desirable and finer grained assessment work on sites would be highly desirable.
- 3.21 Commercial on-shore wind turbines, it is understood, can reach up to 150 metres (or more) from ground level (up to turbine tips) and as such they can be prominent and highly visible (noting that whilst some people find them attractive others take a counter view). They can be of a height that exceeds those referenced in the evidence report and this may mean differing technical considerations should apply now. But, especially at these higher heights the potential for adverse impacts in respect of technical constraints and receptors of adverse environmental or heritage impacts are likely to be more significant.
- 3.22 In due course it will be relevant for committee to consider how they weigh up the potential for wind turbines and farms to have adverse impacts against the renewable energy generation benefits they offer. We would consider, however, that such considerations should ideally be informed by finer grained assessment and analysis work. We would also need to give some further consideration, given NPPF wording, to how we would meet the test of “.....*the planning impacts identified by the affected local community have been appropriately addressed and the proposal has community support.*”

Financial implications:

There are no direct financial implication resulting from the report.

Legal implications:

The legal implications are covered in the report.

Report to: Strategic Planning Committee

Date of Meeting Tuesday 5 March 2024

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



Consultation on Housing sites

Report summary:

The Draft Local Plan consultation which took place from November 2022 to January 2023 included numerous housing and employment sites for consultation as either 'preferred', 'second choice', or 'rejected'. Additional sites for housing development were submitted in this consultation which have been reviewed and assessed, in accordance with the Site Selection methodology. As a result, a total of 13 'new' sites are recommended for the upcoming public consultation. Six sites are 'preferred' allocations, six are rejected, with one site currently categorised as second choice.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

1. That Strategic Planning Committee agree to consult on the housing sites detailed in this report as part of the Reg 18 Addendum consultation planned to start at the end of March.

Reason for recommendation:

To ensure public consultation on housing sites as part of the Local Plan preparation process.

Officer: Ed Freeman – Assistant Director, Planning Strategy and Development Management,
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 Medium Impact

Risk: Medium Risk; It is important that we follow a defined assessment process in deciding which sites to allocate for housing development, to ensure a rational process is followed and can subsequently be justified. It is important that the public are given the opportunity to provide feedback in response to the draft proposals.

Links to background information The consultation draft local plan from November 2022: [Draft Local Plan Consultation - East Devon](#) [Site Selection methodology \(May 2022\)](#)

Link to [Council Plan](#)

Priorities (check which apply)

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

Report in full

1. Introduction

- 1.1 One of the most important aspects of producing a Local Plan is allocating sites for new development. To ensure we have a clear approach on how we consider sites, we have published a Site Selection methodology and are taking all potential sites through this process. Under this process, first we identify a 'long list' of sites (Stage 1), then sift out sites that are unreasonable (Stage 2), only assessing in more detail those sites with a reasonable prospect of being allocated (Stage 3). Finally, based upon a combination of the site assessment, Local Plan spatial strategy, and district-wide housing/employment requirement, we select which sites to allocate, and not, with reasons why (Stage 4).
- 1.2 The Draft Local Plan consultation which took place from November 2022 to January 2023 included numerous housing and employment sites for consultation as either 'preferred', 'second choice', or 'rejected'. We also published a summary of the Site Selection findings at that time.
- 1.3 The Draft Local Plan included a housing requirement of 18,920 dwellings over the plan period 2020 – 2040. The plan included an additional 10% 'headroom', which results in a total of 20,800 dwellings. Against this, the Draft Local Plan identified a supply of 20,441 dwellings, a shortfall of 359 dwellings against the draft policy aspiration.
- 1.4 Additional housing sites were submitted during public consultation, and these have now been subject to a 'summary' assessment with a recommendation as to whether they should be allocated, or not. In addition, one site (Seat_13) was not included in the Draft Local Plan consultation; whilst a smaller version of another site (now known as Brcl_31) was not previously included in the Draft Local Plan consultation due to significant highways constraints – further detail on this is included later in this report.
- 1.5 The purpose of this report is to highlight the summary assessment findings of these additional housing sites, with the intention these are published for consultation in March 2024.

2. Consultation on Housing Sites

- 2.1 A total of 38 additional housing sites were submitted in consultation on the Draft Local Plan. None of the additional sites have been assessed by the HELAA panel to date as it has not been possible to arrange a panel meeting to consider them. They have however been assessed by officers with advice from consultees. Most of the sites were sifted out (Stage 2 in the methodology) for reasons including lack of evidence from the landowner on land availability, overlap with existing sites, and being located in a rural location (i.e., not within or adjacent to settlements in tiers 1 – 4 of the settlement strategy, and not offering potential to be a new settlement).
- 2.2 The site sifting process resulted in 12 'new' sites, plus the existing site at Seaton (Seat_13) that have been subject to site assessment. At this stage, a 'summary' site assessment has been prepared, with further detailed assessment on matters of landscape, historic environment and ecology to be undertaken following public consultation.
- 2.3 Appendix 1 contains a map of each site, some factual details, and the summary site assessment and conclusion for the 13 sites. The following table highlights the conclusion for each site on whether to allocate or not.

Summary of Housing sites proposed for consultation

Settlement	Site ref.	Address	No. dwellings	Allocate?
Axminster	Axmi_16	The Co-operative Food, West Street, Axminster, EX13 5PA	15	No – rejected
Axminster	Axmi_17	Land at Millwey Chard Road, Axminster, EX13 5NL	19	Yes – preferred
Axminster	Axmi_18	Millwey Garages, St Andrews Drive, Axminster, EX13 5EZ	6	Yes – preferred
Axminster	Axmi_23	Websters Garage, 9 Lyme Street, Axminster, EX13 5AT	10	Yes – preferred
Axminster	Axmi_24	Land West of Prestalier Farm, Beavor Lane, Axminster,	29	Yes – preferred
Beer	Beer_03	Land at Quarry Lane, Beer	35	No – rejected
Exmouth	Lymp_17	Land SW of Marley Hayes, Hulham Road, Exmouth EX8 5DZ	20	No – rejected
Exmouth	Exmo_50	Disused police station	20	Yes – preferred
Plymtree	Plym_05	Land West of the Village Hall	43	No – rejected
Seaton	Seat_13	Land adjacent to Axe View Road, Seaton, EX12 2JT	39	Yes – preferred
Tipton St John	Otry_22	Combe Bank	29	No – rejected
Western side of East Devon	Brcl_31	Land at Mosshayne Lane, Pinhoe, East Devon, EX1 3TR	1000	Second choice
Woodbury	Wood_46	West of Wood_10	23	No – rejected

* For information, sites Axmi_17, Axmi_18 and Seat_13 are owned by East Devon District Council.

- 2.4 As the table shows, a total of six sites are 'preferred' allocations for housing, totalling some 123 dwellings; with six sites totalling 165 dwellings not preferred for allocation.
- 2.5 Approximately 1,000 dwellings are included in site Brcl_31, a large site adjacent to the boundary of the M5, proposed as a second choice site for the purposes of the forthcoming consultation. This site was submitted by a national housebuilder in consultation on the Draft Local Plan, which included a sketch masterplan. A key issue is it appears that highways access from the B3181 to the north is required over land that is owned by National Highways, who emphasise that "...our estate cannot be considered as being available for third party development and alternative access proposals should be explored. National Highways would request this is made clear in any public consultation." The housebuilder has said they intend to commence discussions with National Highways shortly, with the aim of resolving any issues prior to publication of the Regulation 19 Local Plan. The forthcoming public consultation may also provide further detail on this matter.

3. Next steps

- 3.1 Following discussion and approval at this Committee, the 13 housing sites will be subject to Regulation 18 public consultation alongside the other aspects on this agenda, with consultation taking place from March 2024. An addendum to the Sustainability Appraisal report will also be published for consultation, highlighting the key sustainability effects of the housing sites, as well as the other aspects of the Regulation 18 consultation.
- 3.2 Where appropriate, some of these housing sites may then be included as allocations in the Regulation 19 'publication' Local Plan, later in 2024.

Financial implications:

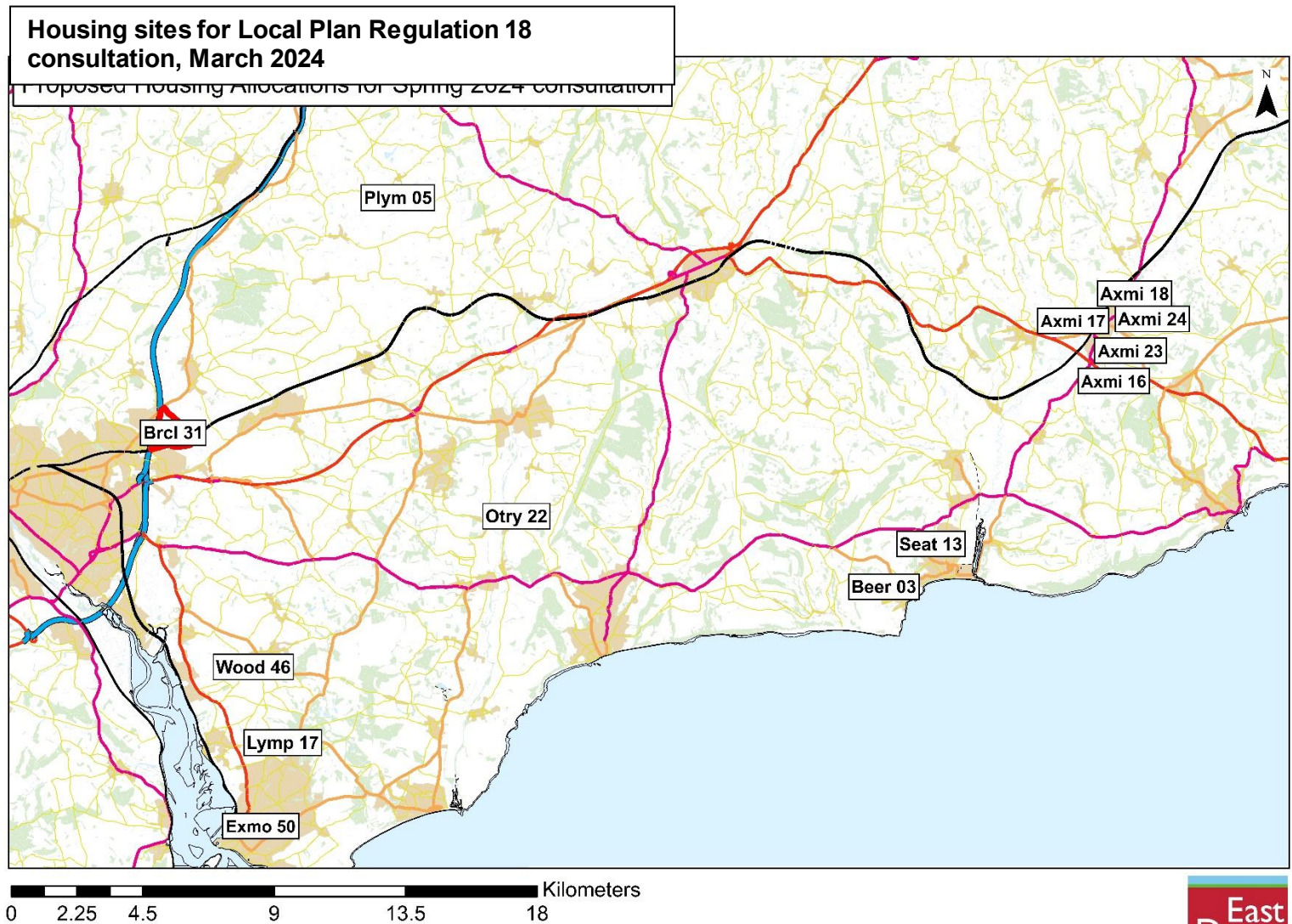
There are no direct financial implications resulting from the report

Legal implications:

There are no direct legal implications resulting from the report.

Appendix One – Housing Site Selection summary findings

The map below shows the location of sites that were assessed. The detailed site assessments that follows starts off with the large strategic site at Mosshayne Lane, Pinhoe (east of M5) and then site ordering follows the hierarchy of settlements as set out in the draft East Devon local plan. Firstly Exmouth then the principle centres and after that local centres and service villages (see Strategic Policy 1 of the consultation draft local plan).



Site details

Settlement: Land at Mosshayne Lane, Pinhoe (east of M5)

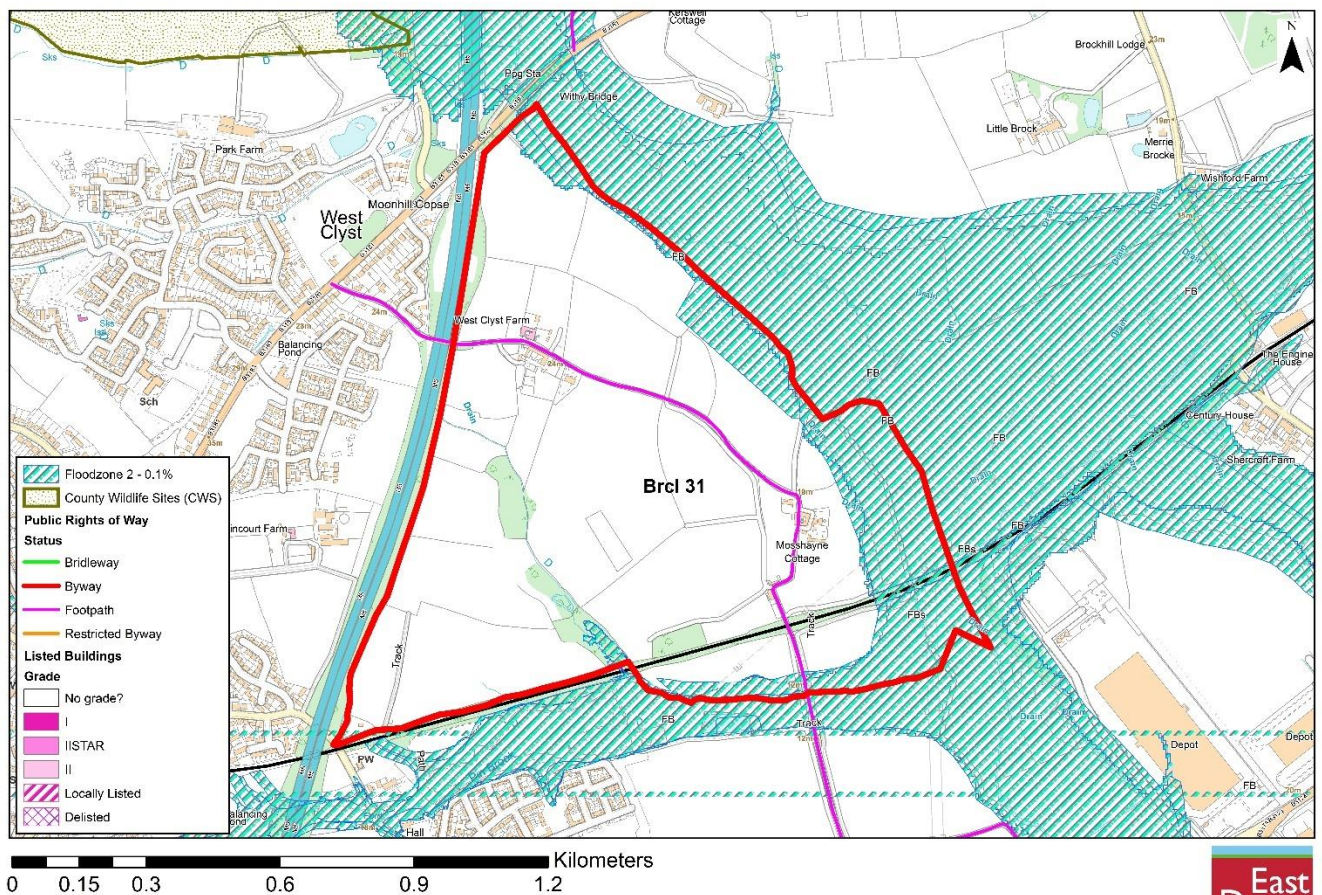
Reference number: Brcl_31

Site area (ha): 109.75

Address: Land at Mosshayne Lane, Pinhoe, Exeter, East Devon, EX1 3TR

Proposed use: Residential plus related uses

Site map



Site Assessment Summary and Conclusion

Infrastructure

Full spectrum of facilities expected including Community Hall, GP practice, Primary School, Secondary School, Public Houses, Shops, Post Office & Stores, Open Spaces, and Play Areas.

Clarification is needed regarding the access point off the B3181 at the northern end of the site. The Barratt Homes / David Wilson Homes Regulation 18 representation states:

"The majority of the development would be accessed via a spine road from the B3181, with the smaller residential parcels in the south western part of the site accessed from Langaton Lane. It is therefore considered that any concerns from the highway authority can be suitably addressed and mitigated through an alternative access strategy." However, National Highways owns land that includes a ransom strip to this access point and a representative on their behalf has since told EDDC: "I would like to emphasise that our estate cannot be considered as being available for third party development and alternative access proposals should be explored. National Highways would request this is made clear in any public consultation."

The housebuilder has said they intend to commence discussions with National Highways shortly, with the aim of resolving any issues prior to publication of the Regulation 19 Local Plan.

Landscape

Medium - This large site of mainly undeveloped fields has the M5 and the new developments at Pinn Court Farm & Moonhill Copse to the west, the Exeter-Waterloo trainline and the new development at Tithebarn to the south and Exeter Logistics Park & Skypark to the south-east.

Historic environment

Medium - There is a Grade II listed building on the site (West Clyst Farm on Mosshayne Lane), but this is already surrounded by a small development and the proposals state that the existing lane would be maintained.

Ecology

Minimal ecological impact provided trees and hedgerows are retained. The site includes an Unconfirmed Wildlife Site (Broadclyst Moor - Dymonds Bridge Marsh) but this could be incorporated into the Clyst Valley Regional Park. Overall, minor adverse effect predicted (not significant).

Accessibility

The site would require its own range of facilities, but it is currently within 1,600m of four or more facilities, including schools, a hall, and a pub. The nearest primary school is currently Westclyst Community Primary School and nearest secondary school is Clyst Vale Community College. The nearest train station is Pinhoe (approximately 700m from the south-west corner of the site).

Other constraints

A total of 14.81ha falls within FZ3 (1%) and 20.22ha within FZ2 (0.1%) but these areas fall within the Clyst Valley Regional Park portion of the site. Agricultural Land - Only a small pocket of the site (in the south-east) was classified in the post-1988 assessment (at Grade 2 and Grade 3b) but the 2002 strategic assessment work found the majority of the site to be Grade 1 (and Grade 3 in the north and along the boundary to the south-east of the site). Noise issues that would affect the site will likely require mitigation – particularly from the M5 to the west and possibly also from the railway line to the south.

Within Green Wedge in adopted Local Plan 2013-31 or made Neighbourhood Plan?

No.

Opportunities

North-South trail (part of the Clyst Valley Regional Park Strategy), sports pitches, community facility, natural & semi-natural greenspace for biodiversity enhancements and green with play space.

Yield (number of dwellings or hectares of employment land)

Approximately 1,000 dwellings

Contribution to spatial strategy

Land at Mosshayne Lane is a sustainable location for new development, which would align with the Council's overall spatial strategy. The site is in close proximity to the extensive facilities and services available in Exeter, as well as other existing infrastructure in the vicinity of the site, including Pinhoe Railway Station to the south west and Exeter Science Park to the south. The proposed development could facilitate a connection over the railway line, providing a link to these facilities.

Should the site be allocated?

Second choice.

Reasons for allocating or not allocating

The site is being promoted by a national housebuilder who have stated they have the resource and expertise to deliver this development in full. The proposed development would accommodate approximately 1,000 dwellings, land for educational use and extensive areas of public open space (including a country park), which would collectively represent a sustainable community that could benefit future and existing residents within the western part of East Devon.

If whole site is not suitable for allocation, could a smaller part be allocated?

N/A

Site details

Settlement: Exmouth

Reference number: Lymp_17

Site area (ha): 3

Address: Land southwest of Marley Hayes, Hulham Road, Exmouth EX8 5DZ

Proposed use: Residential

Site map



0 0.03 0.06 0.12 0.18 0.24 Kilometers

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Site Assessment Summary and Conclusion

Infrastructure

The site is being promoted with an access over a private road via a narrow junction onto Marley Road. Without significant upgrading, involving substantial vegetation loss, it is suggested that it is highly unlikely that this junction could support anything more than minimal new development (perhaps nil development) and there would also be a need for widening of a narrow private lane. If allocated the assumption is that access would need

to be achieved via other proposed allocated land in this north-eastern part of Exmouth or perhaps a new access off Marley Road would be possible.

Landscape

The site is well screened with mature trees and vegetation to boundaries and within. The site has a quiet and quite remote countryside feel, in part because of maturity of surrounding vegetation, despite relative proximity to built development on its north-eastern edge. There are many mature trees within the site that would need to be retained and adequately buffered - this would place significant limits on development potential. Overall, medium-high landscape sensitivity.

Historic environment

There are no listed buildings in close proximity of the site and nil or limited potential for adverse heritage impacts would be expected from development. Overall, low: no concerns on current evidence, although archaeological mitigation measures may be required.

Ecology

The site comprises of what would appear to be non-improved grassland with a substantial number of mature trees within the site and to its boundaries. A number of these trees are subject to Tree Preservation Orders. As such there will be significant local wildlife value at the site. The site is an Unconfirmed County Wildlife site. Overall, significant moderate adverse effect predicted.

Accessibility

The site falls within 1,600 metres of a range of services and facilities.

Other constraints

No additional constraints are noted.

Within Green Wedge in adopted Local Plan 2013-31 or made Neighbourhood Plan?

No

Opportunities

No specific opportunities are noted.

Yield (number of dwellings or hectares of employment land)

20

Contribution to spatial strategy

Exmouth is the Principal Centre in East Devon and should therefore see significant development to serve its own needs and that of the wider surrounding areas.

Should the site be allocated?

No

Reasons for allocating or not allocating

Based specifically on wildlife value of the site and concerns around acceptability of highway access the site should not be allocated for development.

If whole site is not suitable for allocation, could a smaller part be allocated?

No

Site details

Settlement: Exmouth

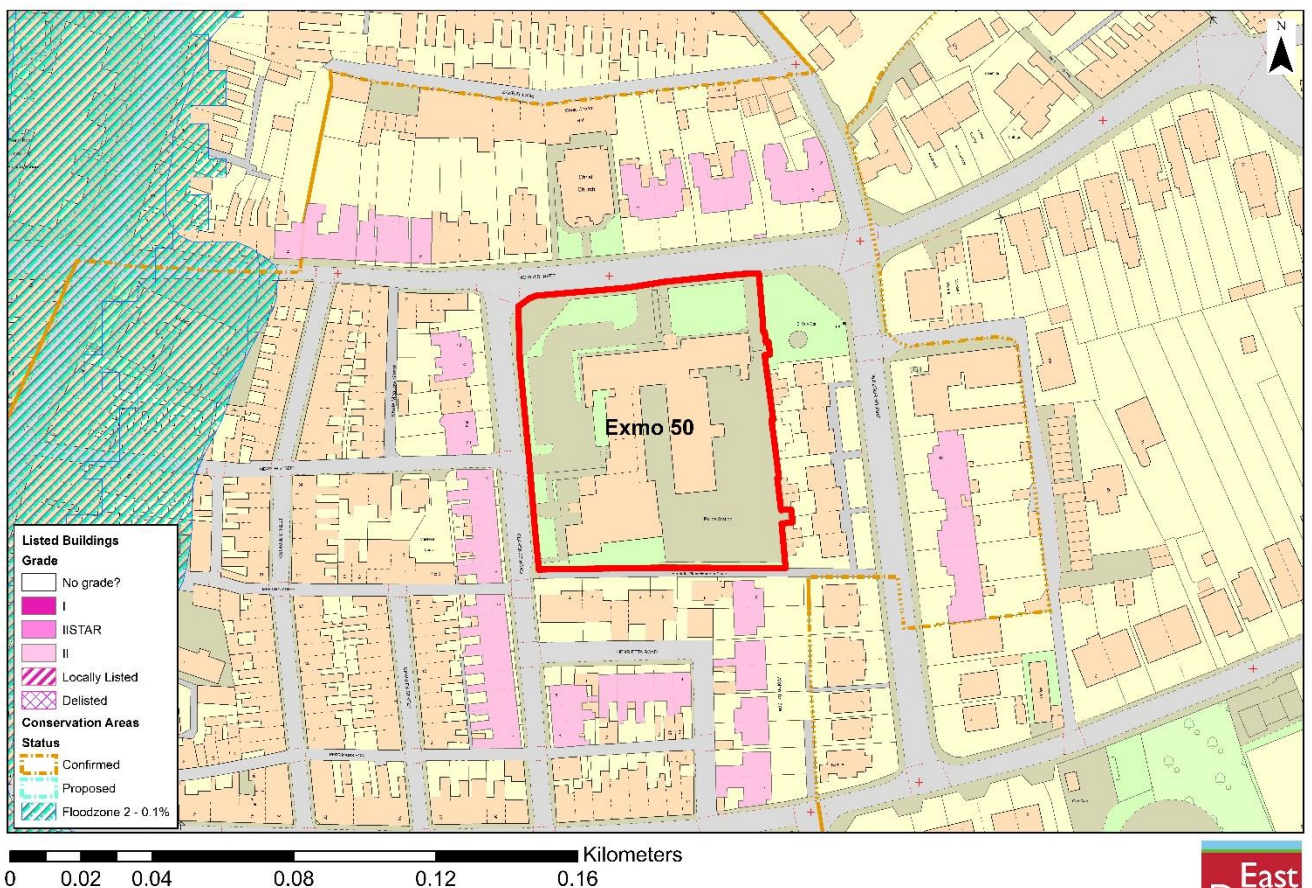
Reference number: Exmo_50

Site area (ha): 0.55

Address: Disused police station

Proposed use: Residential

Site map



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Site Assessment Summary and Conclusion

Infrastructure

From officer assessment there is no evidence to suggest that there are technical constraints that would inhibit re-development for housing.

Landscape

This site sits in an urban area of Exmouth, close to the town centre and surrounded by built development, predominantly in residential use. Landscape sensitivity is considered to be low and potential for adverse landscape impacts has been screened out.

Historic environment

The land around the police station site forms one of the core historic areas of development of Exmouth. Late 19th Century Ordinance Survey mapping shows an already built-up residential urban fabric in this part of the town and the site itself, referenced as Branswick Square on historic mapping, can be assumed to have been a formal green urban square to what were, and predominantly remain, substantial residences (a few split into flats) fronting on to, and near to, the site/the square. The existing police station building (understood to become redundant in its current form) is a post second world war Modernist informed development of some 20th Century historic interest. There are a significant number of Grade II listed residential properties, mostly dating from the early/mid 19th Century, that are at and around the site boundaries. The sites past use and history plus the relevance of surrounding assets can form a positive cue to inform a well designed and implemented scheme that offers scope for enhancement of the setting of the assets. Overall, medium: no significant effects which cannot be mitigated.

Ecology

There are no designated wildlife sites at or in close proximity of the site. The site is currently occupied by a police station building built in the latter half of the 20th century. There are limited formal green spaces around the existing building and a small number of existing trees on site. Overall, minor adverse effect predicted (not significant).

Accessibility

The site falls within 1,600 metres of a range of services and facilities, it is close to Exmouth town centre and has good access to public transport.

Other constraints

No additional constraints are noted.

Within Green Wedge in adopted Local Plan 2013-31 or made Neighbourhood Plan?

No

Opportunities

No specific opportunities are noted.

Yield (number of dwellings or hectares of employment land)

20

Contribution to spatial strategy

Exmouth is the Principal Centre in East Devon and should therefore see significant development to serve its own needs and that of the wider surrounding areas.

Should the site be allocated?

Yes

Reasons for allocating or not allocating

The site occupies an urban residential location and the existing police station building is understood to be redundant. Devon and Cornwall Police have advised of their intent to submit a planning application for the redevelopment of the site to include a new police station and for 0.4 hectares of the site to accommodate residential development. The site falls within the Exmouth Conservation Area and there are a large number of Grade II listed residential buildings close to the site and on its northern and western edges directly fronting on to the site. There is, therefore, significant heritage interest that any redevelopment will need to be especially sensitive to. The police station building itself is representative of a period of post 2nd world war Modernist informed architecture, that is increasingly being lost, and as such is of some interest. The site does present a good opportunity for sensitive redevelopment to include residential uses.

If whole site is not suitable for allocation, could a smaller part be allocated?

Yes - In line with Devon and Cornwall Police aspirations around 0.4 hectares of the site would form a reasonable allocation element for residential uses.

Site details

Settlement: Axminster

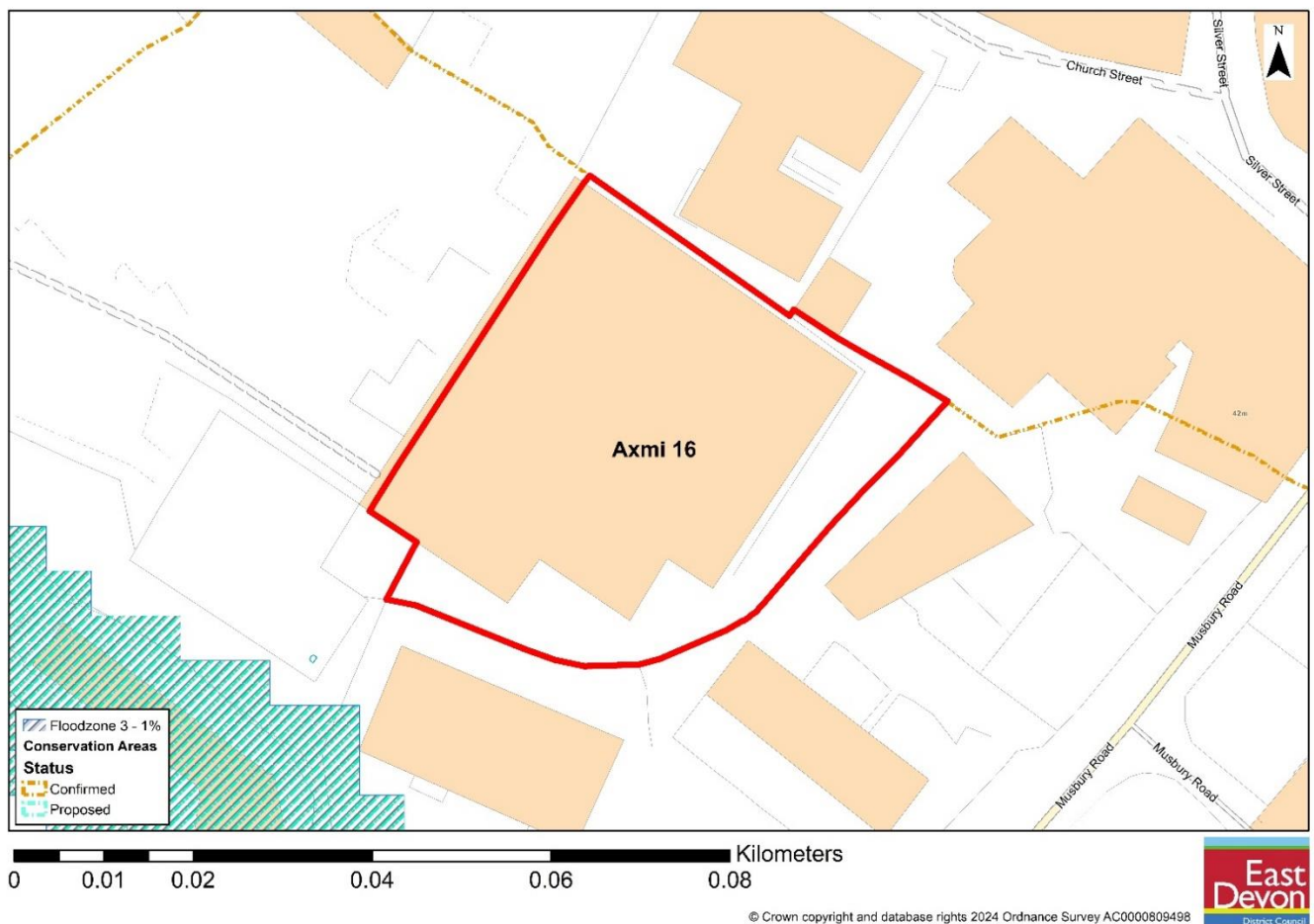
Reference number: Axmi_16

Site area (ha): 0.2

Address: The Co-operative Food, West Street, Axminster, EX13 5PA

Proposed use: Residential

Site map



Site Assessment Summary and Conclusion

Infrastructure

Devon County Council Highways advise that there is an existing private access into this brownfield site that also serves private car parks and is already subject to regular levels of vehicle movement. It is also close to local amenities and well served by public footways. DCC Education advise that there is capacity for secondary places at Axe

Valley School, but it may be difficult to extend primary school provision to accommodate housing levels beyond those set out in current local plan.

Landscape

Overall landscape sensitivity - low. Site comprises a food store in an urban setting.

Historic environment

Medium: no significant effects which cannot be mitigated.

Ecology

The site is within 50 metres of a potential nature recovery network (grassland) and a habitat of principle importance (a small stream). Minor adverse effect predicted (not significant). The site is within the River Axe SAC Nutrient catchment zone and would need to deliver nutrient neutral development .

Accessibility

The site is within the town centre and 1600 metres of at least 9 different types of services and facilities, including a GP practice, community hall, post office, pubs, shops, primary and a secondary school. Axminster train station is within 350 metres and the site is closet to a bus route with an hourly service.

Other constraints

The site is adjacent to an area of potentially contaminated land.

Within Green Wedge in adopted Local Plan 2013-31 or made Neighbourhood Plan?

No

Opportunities

none identified

Yield (number of dwellings or hectares of employment land)

15

Contribution to spatial strategy

The emerging local plan spatial strategy promotes significant development to the main centres of East Devon, including Axminster as a 'Tier 2' settlement. Axminster has a good range of facilities including a train station and secondary school. In principle, Axminster is considered to be a good location for additional housing and employment growth within the plan period.

Should the site be allocated?

No

Reasons for allocating or not allocating

The site is located within the proposed town centre and primary shopping area, where development should enhance the range and quality of town centre, shopping and leisure facilities. Redevelopment of the site for housing would be incompatible with this as it would result in the loss of a supermarket.

If whole site is not suitable for allocation, could a smaller part be allocated?

no

Site details

Settlement: Axminster

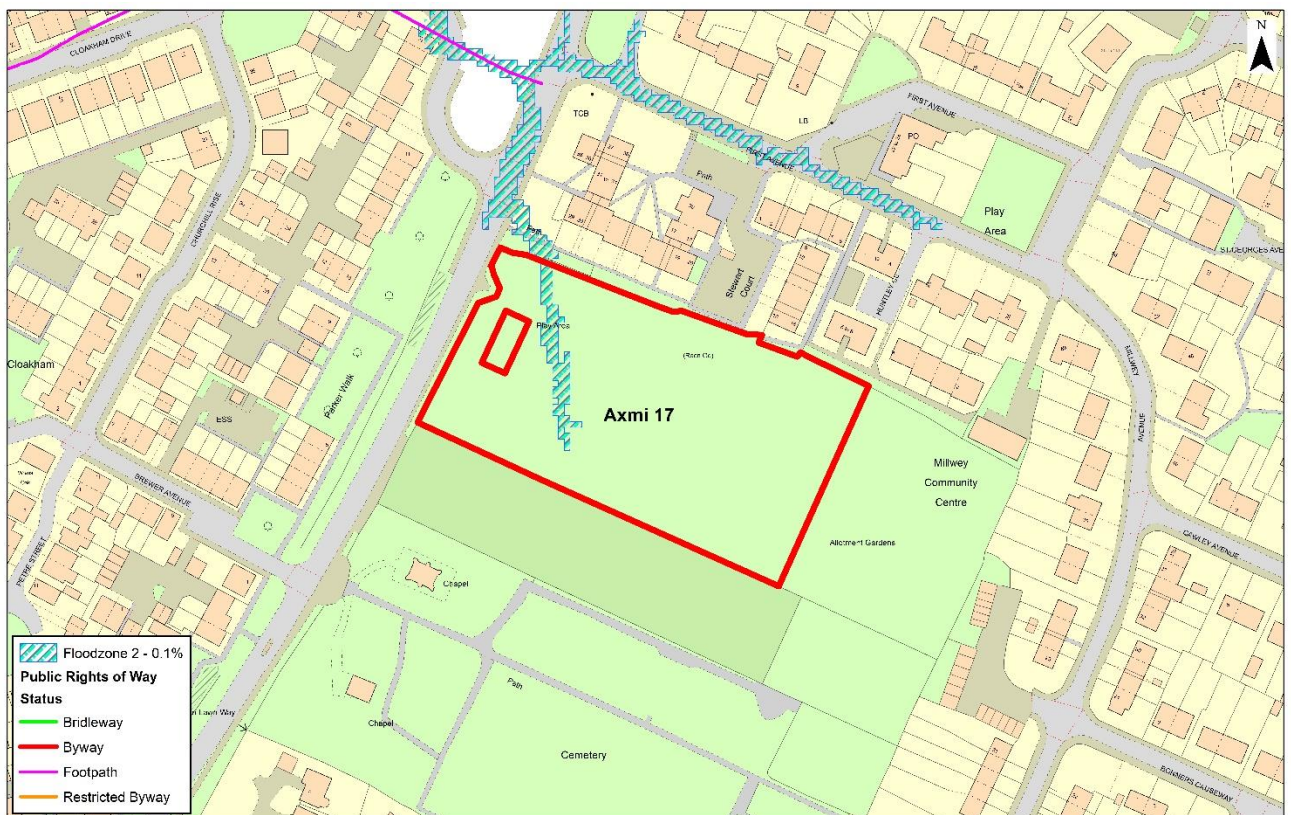
Reference number: Axmi_17

Site area (ha): 0.95

Address: Land at Millway Chard Road, Axminster, EX13 5NL

Proposed use: Residential

Site map



0 0.02 0.04 0.08 0.12 0.16 Kilometers

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Site Assessment Summary and Conclusion

Infrastructure

Devon County Council Highways advise that the site has good pedestrian accessibility with the existing access being in close proximity to a pedestrian crossing and opposite a bus stop. Access arrangements may require mitigation. DCC Education advise that there is capacity for secondary school places at Axe Valley School, but it may be difficult to extend primary school provision to accommodate housing levels beyond those set out in the current local plan.

Landscape

Overall landscape sensitivity - Medium. Site forms a 'green' and visually 'open' space within the urban fabric of the town. It is bounded by mature hedges, but views across the site are available from the field gate to Chard Road with filtered views through the hedge during the dormant season.

Historic environment

Low: no concerns identified on current evidence, although archaeological mitigation measures may be required. No impact upon an asset is predicted or, if an impact is predicted, the cultural heritage value of the asset(s) would be unaffected. The Devon Historic Environment Record shows that the site formed part of a second world war United States military hospital.

Ecology

The site is a potential nature recovery network site (grassland). Minor adverse effect predicted (not significant). The site is within the River Axe SAC Nutrient catchment zone and would need to deliver nutrient neutral development.

Accessibility

The site is within 1600 metres of at least 9 different types of services and facilities, including a GP practice, community hall, post office, pubs, shops, primary and a secondary school. Axminster train station is within 1400 metres and the site is adjacent to a bus route with an hourly service. Pedestrian access to the town centre is possible along Chard Road.

Other constraints

A small section of the site is subject to flooding and will require further assessment. The site forms open space and was previously used for sports purposes. Any potential for allocation for development would need to take into account the acceptability of open space loss and also the possible need for replacement provision of equal or greater benefit.

Within Green Wedge in adopted Local Plan 2013-31 or made Neighbourhood Plan?

No

Opportunities

The site is owned by the District Council so there is an opportunity to tailor housing to local priorities and to provide for other community needs

Yield (number of dwellings or hectares of employment land)

19

Contribution to spatial strategy

The emerging local plan spatial strategy promotes significant development to the main centres of East Devon, including Axminster as a 'Tier 2' settlement. Axminster has a good range of facilities including a train station and secondary school. In principle, Axminster is considered to be a good location for additional housing and employment growth within the plan period.

Should the site be allocated?

Potentially Yes – but as it is existing open space with a previous use for sports pitches it would need to be demonstrated that any net loss would be acceptable in planning terms taking into account, if relevant, potential replacement provision elsewhere.

Reasons for allocating or not allocating

The site is located within the existing urban fabric of the town and is well related to a very good range of services and facilities.

If whole site is not suitable for allocation, could a smaller part be allocated?

N/A

Site details

Settlement: Axminster

Reference number: Axmi_18

Site area (ha): 0.25

Address: Millwey Garages, St Andrews Drive, Axminster, EX13 5EZ

Proposed use: Residential

Site map



0 0.02 0.04 0.08 0.12 0.16 Kilometers

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Site Assessment Summary and Conclusion

Infrastructure

Devon County Council Highways advise that it is difficult to assess the access from desktop analysis but the visibility to the access may have its constraints due to existing surrounding infrastructure. DCC Education advise that there is capacity for secondary school places at Axe Valley School, but it may be difficult to extend primary school provision to accommodate housing levels beyond those set out in current local plan.

Landscape

Overall landscape sensitivity - Low. The site comprises a garage court and parking area surrounded by housing and industrial buildings.

Historic environment

Low: no concerns identified on current evidence, although archaeological mitigation measures may be required. No impact upon an asset is predicted or, if an impact is predicted, the cultural heritage value of the asset(s) would be unaffected. The Devon Historic Environment Record shows that the site formed part of a second world war United States military hospital.

Ecology

The site is within the River Axe SAC Nutrient catchment zone and would need to deliver nutrient neutral development. No other issues identified. Overall, minor adverse effect predicted (not significant).

Accessibility

The site is within 1600 metres of at least 9 different types of services and facilities, including a GP practice, community hall, post office, pubs, shops, primary and a secondary school. Axminster train station is within 1800 metres and the site is close to a bus route with an hourly service. Pedestrian access to the town centre is possible along Chard Road.

Other constraints

The access road is narrow and may be unsuitable for proposed development.

Within Green Wedge in adopted Local Plan 2013-31 or made Neighbourhood Plan?

No

Opportunities

Development would remove unsightly garages.

Yield (number of dwellings or hectares of employment land)

6

Contribution to spatial strategy

The emerging local plan spatial strategy promotes significant development to the main centres of East Devon, including Axminster as a 'Tier 2' settlement. Axminster has a good range of facilities including a train station and secondary school. In principle, Axminster is considered to be a good location for additional housing and employment growth within the plan period.

Should the site be allocated?

Yes

Reasons for allocating or not allocating

The site is located within the existing urban fabric of the town and is well related to a very good range of services and facilities.

If whole site is not suitable for allocation, could a smaller part be allocated?

N/A

Site details

Settlement: Axminster

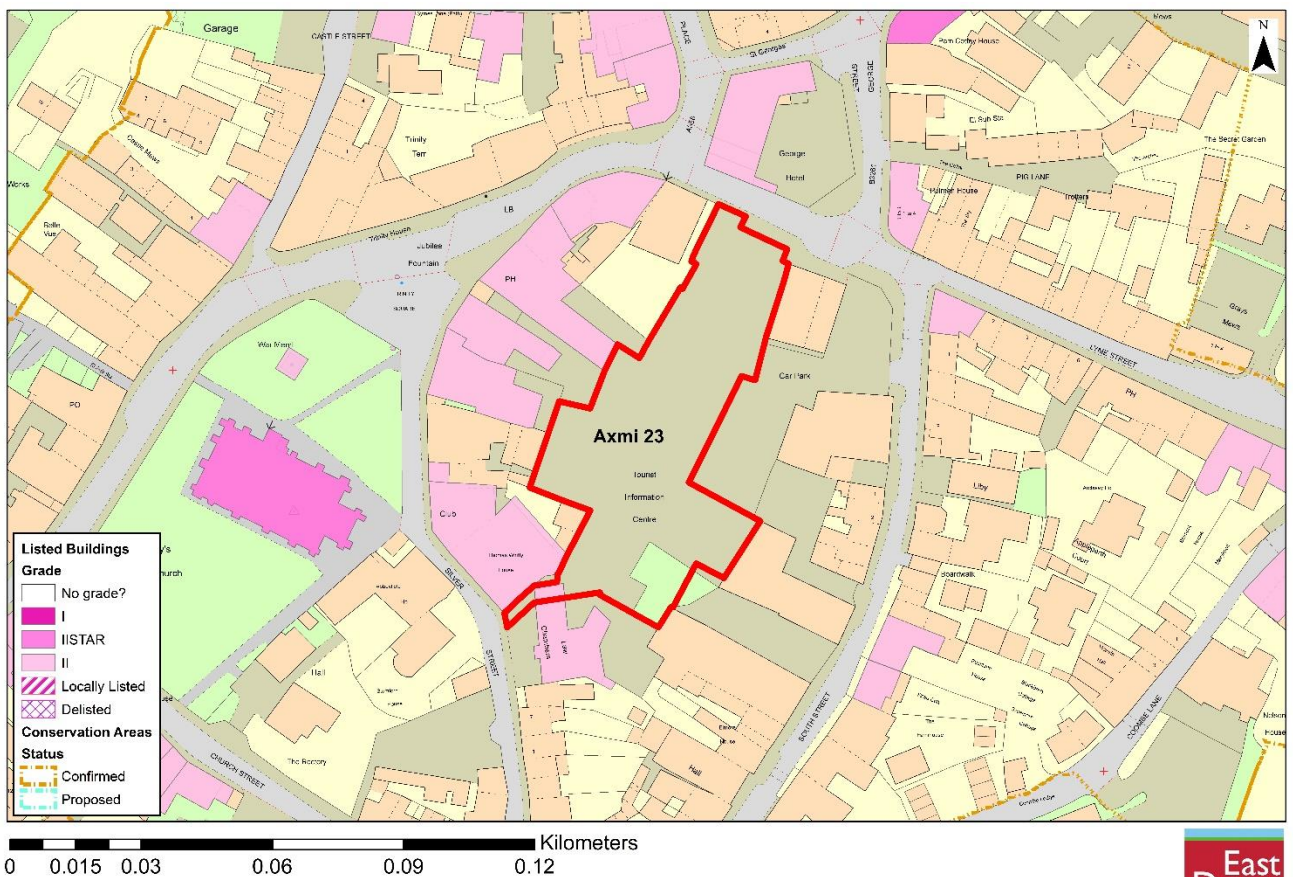
Reference number: Axmi_23

Site area (ha): 0.28

Address: Websters Garage, 9 Lyme Street, Axminster, EX13 5AT

Proposed use: Residential

Site map



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Site Assessment Summary and Conclusion

Infrastructure

No DCC highway or education comments available.

Landscape

Landscape sensitivity - low. Site of demolished buildings being used as a temporary surface car park but located in core of the historic town and surrounded by heritage assets.

Historic environment

The redevelopment of the site has the potential to affect the setting of several heritage assets. Overall, medium: no significant effects which cannot be mitigated.

Ecology

The site is within the River Axe SAC Nutrient catchment zone and would need to deliver nutrient neutral development. It is also within 100 metres of a potential grassland nature recovery network (the Churchyard). Although a 'significant moderate adverse effect is predicted' by the standard methodology due to the proximity of the churchyard, given the existing nature of the site (formerly developed site in use as a car park) a minor adverse effect predicted (not significant).

Accessibility

The site is within the town centre and is less than 1600 metres from at least 9 different types of services and facilities, including a GP practice, community hall, post office, pubs, shops, primary and a secondary school. Axminster train station is within 500 metres and the site is adjacent to a bus route with an hourly service.

Other constraints

Much of the site is potentially contaminated land. The site is in use as a public car park and is within the proposed town centre area.

Within Green Wedge in adopted Local Plan 2013-31 or made Neighbourhood Plan?

No

Opportunities

The site comprises an unsightly surface car park in the conservation area and surrounded by heritage assets. Redevelopment of the site provides an opportunity to improve the visual appearance of the site and provide a mix of appropriate town centre uses, including an element of housing.

Yield (number of dwellings or hectares of employment land)

10

Contribution to spatial strategy

The emerging local plan spatial strategy promotes significant development to the main centres of East Devon, including Axminster as a 'Tier 2' settlement. Axminster has a good range of facilities including a train station and secondary school. In

principle, Axminster is considered to be a good location for additional housing and employment growth within the plan period.

Should the site be allocated?

Yes

Reasons for allocating or not allocating

The site is located within the existing urban fabric of the town and is well related to a very good range of services and facilities. Residential use is acceptable as part of a mixed use redevelopment scheme.

If whole site is not suitable for allocation, could a smaller part be allocated?

N/A

Site details

Settlement: Axminster

Reference number: Axmi_24

Site area (ha): 2.65

Address: Land West of Prestalier Farm, Beavor Lane, Axminster,

Proposed use: Residential

Site map



Site Assessment Summary and Conclusion

Infrastructure

No DCC highway or education comments available.

Landscape

Landscape sensitivity - medium.

Historic environment

Low: no concerns identified on current evidence, although archaeological mitigation measures may be required. No impact upon an asset is predicted or, if an impact is predicted, the cultural heritage value of the asset(s) would be unaffected.

Ecology

The site is within the River Axe SAC Nutrient catchment zone and would need to deliver nutrient neutral development. No other issues identified. Overall, minor adverse effect predicted (not significant).

Accessibility

The site is within 1600 metres from at least 9 different types of services and facilities, including a GP practice, community hall, post office, pubs, shops, primary and a secondary school. Axminster train station is within 1300 metres and the site is within 300 metres of a bus route with an hourly service.

Other constraints

none identified

Within Green Wedge in adopted Local Plan 2013-31 or made Neighbourhood Plan?

no

Opportunities

Yield (number of dwellings or hectares of employment land)

29

Contribution to spatial strategy

The emerging local plan spatial strategy promotes significant development to the main centres of East Devon, including Axminster as a 'Tier 2' settlement. Axminster has a good range of facilities including a train station and secondary school. In principle, Axminster is considered to be a good location for additional housing and employment growth within the plan period.

Should the site be allocated?

Yes

Reasons for allocating or not allocating

The site is well connected to a range of services and facilities.

If whole site is not suitable for allocation, could a smaller part be allocated?

N/A

Site details

Settlement: Seaton

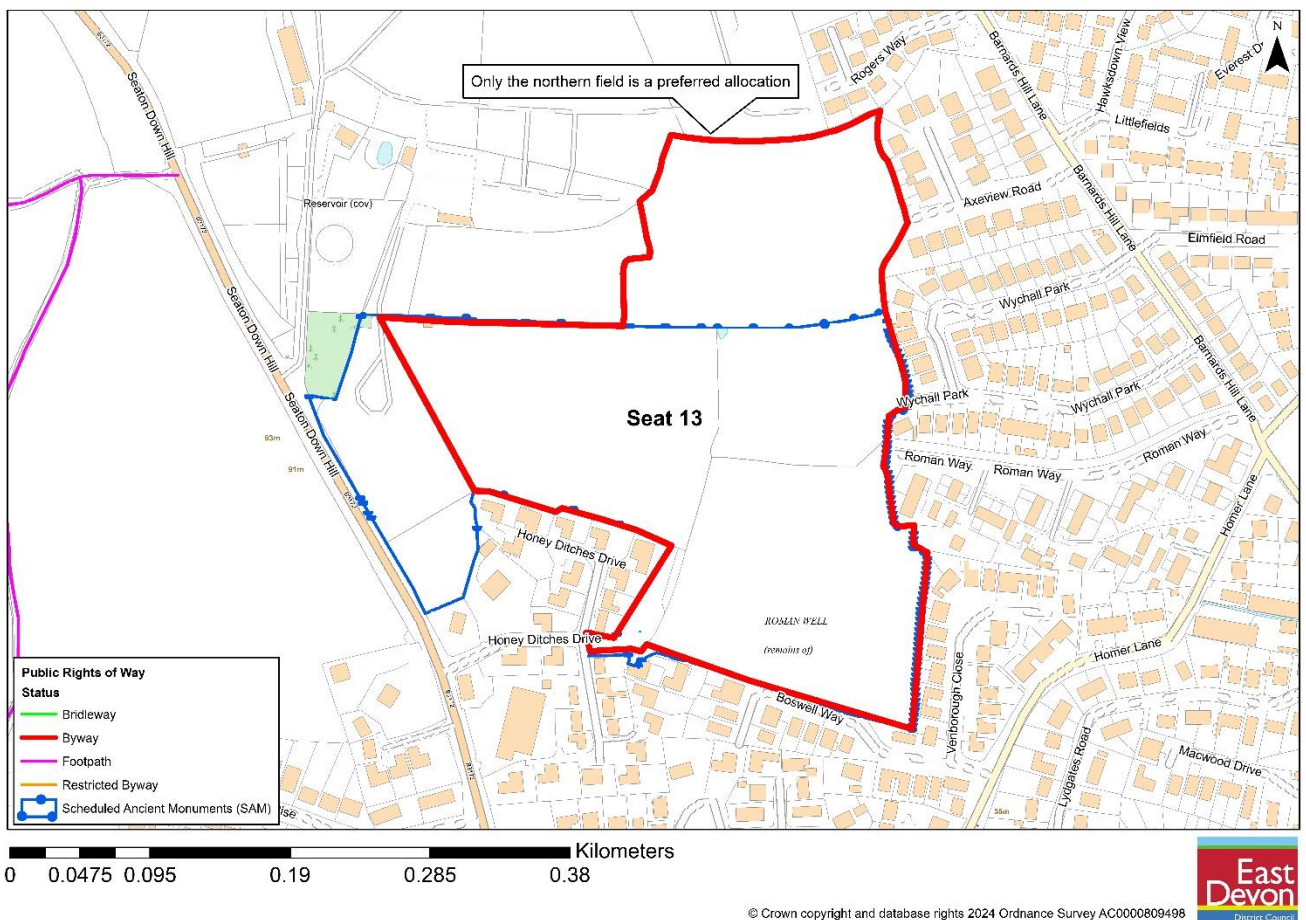
Reference number: Seat_13

Site area (ha): 8.39

Address: Land adjacent to Axe View Road, Axe View Road, Seaton, EX12 2JT

Proposed use: Residential

Site map



Site Assessment Summary and Conclusion

Infrastructure

DCC Highways: Access would be off existing Estate Roads. Existing pedestrian infrastructure and local transport nearby.

DCC Education: Seaton primary has capacity to support some development - but not to the overall level proposed in the town. The impact should be considered alongside proposed sites in the vicinity of Colyford. The ability to provide safe walking routes

between the proposed sites and the primary school should also be considered. Secondary capacity needs to be assessed with other proposed sites within the Axe Valley school catchment area.

Landscape

Widely visible site, sloping from west to east towards the Axe Valley. However, seen in context of modern dwellings to east/north east and caravan park to north/north west, and simple landcover. Overall, medium landscape sensitivity to new development.

Historic environment

Roman And Earlier Settlement At Honeyditches Scheduled Monument forms the southern three fields of Seat_13. This Scheduled Monument runs along the southern boundary of the remaining (northern) field which passes the HELAA, and is therefore subject to site assessment. Given proximity to SM, archaeological assessment required before site is developed. Overall, medium: no significant effects that cannot be mitigated.

Ecology

Single field of agriculturally improved grassland, 4-5 mature trees within hedgerow boundary including 1x veteran tree. Within Beer Quarry and Caves SAC consultation zone, sustenance zones, landscape connectivity zone, so a significant moderate adverse effect predicted.

Accessibility

10 out of 12 facilities within 1,600m of site (excl. Colyton Grammar). Pedestrian access can link into existing footpath on Axeview Road. Hourly or greater (intra town) bus service from Barnards Hill Lane 120m to east. 1.4km to town centre, but school, GP closer at 400m.

Other constraints

Grade 3 agricultural land. Slither of surface water flood risk (1/100yr) runs east to west through the southern part of the site. Northern half is within a Green Wedge designated in Local Plan 2013-31, but it is not considered that development would damage settlement identity or lead to settlement coalescence.

Within Green Wedge in adopted Local Plan 2013-31 or made Neighbourhood Plan?

Yes

Opportunities

Pedestrian access can link into existing footpath on Axeview Road, adjacent to east.

Yield (number of dwellings or hectares of employment land)

39

Contribution to spatial strategy

As a Main Centre, the emerging LP proposes significant development at Seaton to serve its own needs and that of wider surrounding areas. However, Seaton has fewer jobs, lacks some strategic facilities (train station, secondary school, swimming pool), and is located in a less accessible location compared to some other Main Centres.

Should the site be allocated?

Yes

Reasons for allocating or not allocating

The scale of development on this site would help deliver the district-wide housing requirement in a manner that is consistent with the spatial strategy. Good access to facilities and employment, medium landscape sensitivity, but ecological impacts relating to use by Beer Quarry and Caves SAC bats and impact upon Scheduled Monument will need to be addressed in delivering the site.

If whole site is not suitable for allocation, could a smaller part be allocated?

Yes - the single field immediately north of the Scheduled Monument.

Site details

Settlement: Woodbury

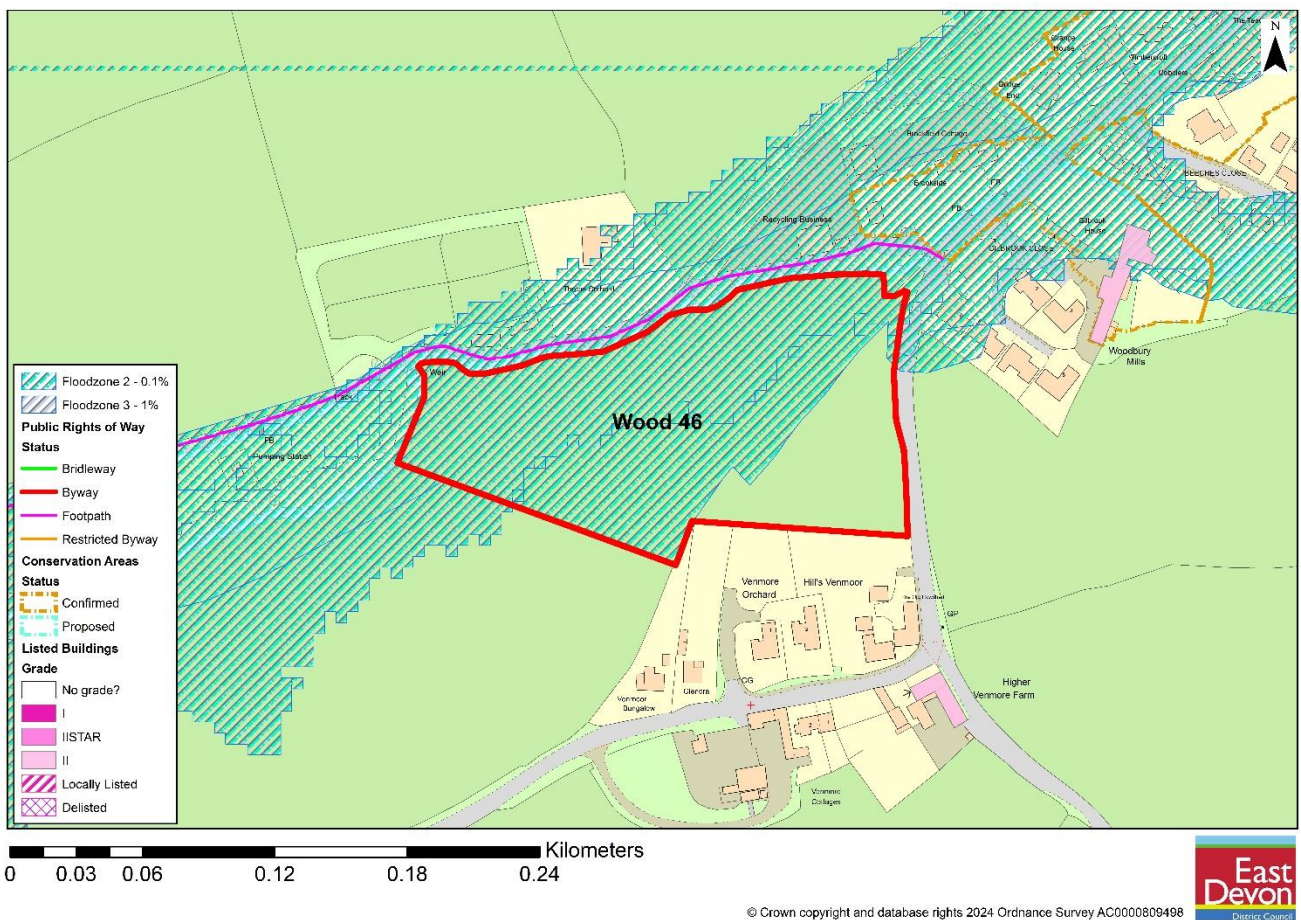
Reference number: Wood_46

Site area (ha): 1.99

Address: West of Wood_10

Proposed use: Residential

Site map



Site Assessment Summary and Conclusion

Infrastructure

No DCC Education and Highways comments specifically for this site, but education capacity issues are highlighted for other sites in Woodbury, and comments for Wood_10 across the road identify need for continuous footway to connect to adjoining site - the public right of way just beyond the northern edge of Wood_46 offers the opportunity for a continuous footway that avoids the main road, although this would require a bridge over

the intervening stream. The middle and outer zones associated with the high pressure gas pipeline cover the western part of the site.

Landscape

Located within Landscape Character Type E. Lowland plains. Large, level, arable field adjoining the western tip of Woodbury. Open, short distance views of the site from the public right of way to the north of the site. The site protrudes into open countryside, with limited context of built form. Overall, a medium/high landscape sensitivity.

Historic environment

Woodbury Conservation Area 30m to NE but intervening trees mean limited intervisibility. 2 Grade II listed buildings 90m to east and 65m to south, but intervening dwellings mean no adverse impact upon these assets. Overall, Low: no concerns identified on current evidence, although archaeological mitigation measures may be required.

Ecology

A single arable field, with a stream running along the northern boundary and small group of trees to NE and NW. Minor adverse effect predicted (not significant).

Accessibility

10 out of 12 facilities within 1,600m, but currently the site does not link to existing footpaths. The public right of way just beyond the northern edge of the site offers the opportunity for a continuous footway that avoids the main road, which would require a bridge over the intervening stream.

Other constraints

Grade 3 agricultural land. Flood Zone 3 covers northern part of site, overlapping with surface water flood risk, so net area of 0.95 ha and yield reduced accordingly. Flood Zone 2 extends further across the site, leaving around 0.44 ha in Flood Zone 1.

Within Green Wedge in adopted Local Plan 2013-31 or made Neighbourhood Plan?

No

Opportunities

Upgrade the public right of way to provide a pedestrian route that connects to the existing footpath into the settlement centre, including a footbridge from the site over the stream.

Yield (number of dwellings or hectares of employment land)

23

Contribution to spatial strategy

The spatial strategy identifies Woodbury as a Local Centre to meet local development needs and those of immediate surrounds. Whilst the site in isolation

accords with this strategy, there are other more preferable sites in Woodbury to meet this strategy.

Should the site be allocated?

No

Reasons for allocating or not allocating

Medium/high landscape impact, poorly related to the existing built form in Woodbury. Whilst the site in isolation accords with the spatial strategy, there are other more preferable sites in Woodbury to meet this strategy.

If whole site is not suitable for allocation, could a smaller part be allocated?

No

Site details

Settlement: Beer

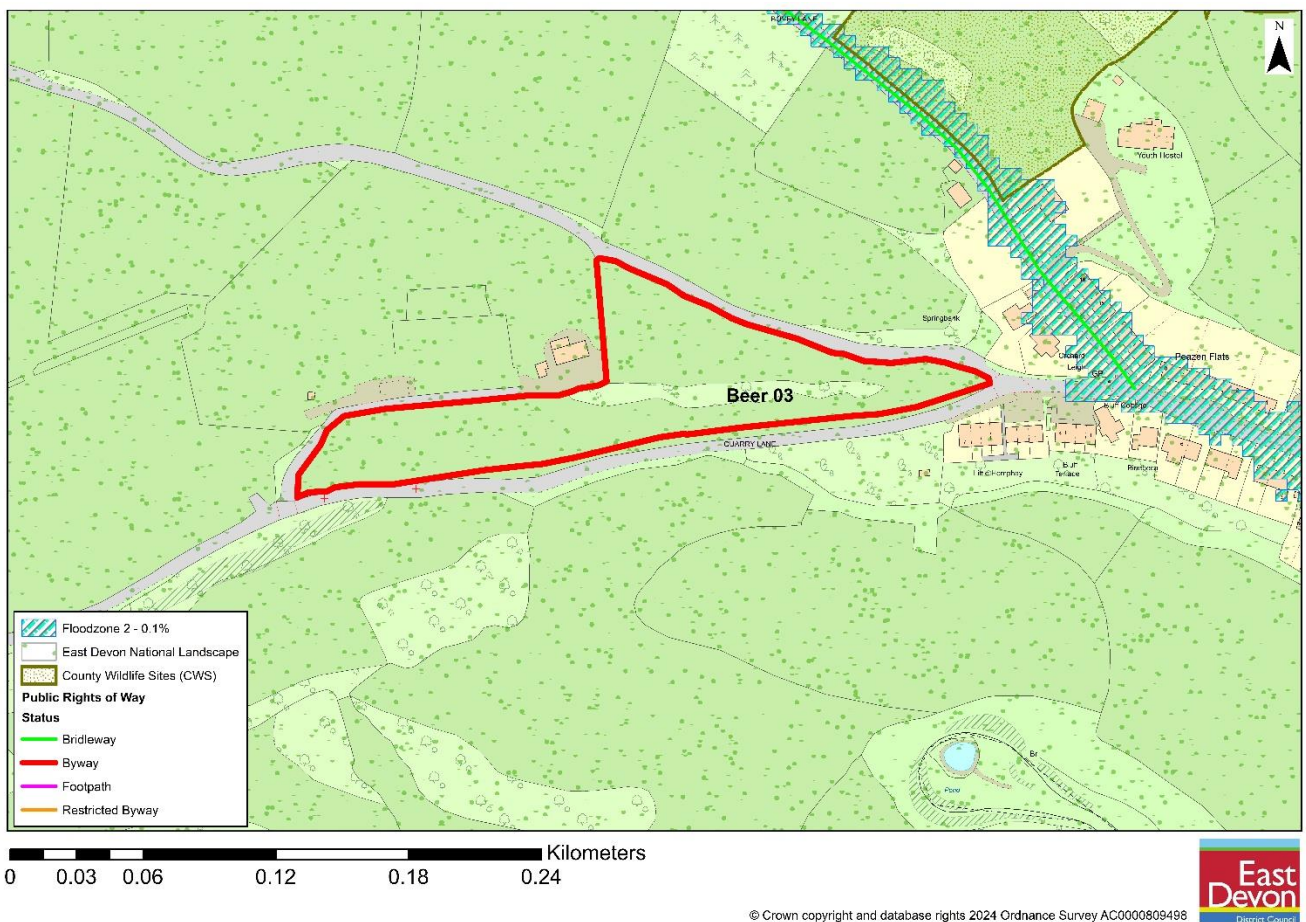
Reference number: Beer_03

Site area (ha): 1.23

Address: Land at Quarry Lane, Beer

Proposed use: Residential

Site map



Site Assessment Summary and Conclusion

Infrastructure

Site is adjacent to Quarry Lane and is assessable by pavement from the centre of Beer. Comments of the Highway Authority regarding creation of access onto Quarry Lane not yet available. The Education Authority advise that Beer Primary school has limited capacity to support development and lies on a very constrained site, and also that there would be a transport implication for access to the nearest secondary school.

Landscape

Sensitivity is considered to be high. The site lies entirely within the East Devon National Landscapes (AONB) and the Coastal Preservation Area, just beyond the far extent of built development at Beer along Quarry Lane. The site forms part of the setting and approach to Beer at this point, and has an intact tranquil and rural character (typical of the landscape character type for the area). It is considered to have a high scenic quality, with few modern detractors visible.

Historic environment

There are no designated heritage assets within 100m of the site. The site lies c.200m from the far eastern extremity of the Beer Conservation Area which covers the historic centre of Beer, and c.230m from the nearest Listed Building within it, with intervening modern/ new residential development. Whilst there is no direct intervisibility, the site forms part of the setting of Beer and has a sense of being part of an historic landscape due to the enclosed pastoral nature of it. Lying on Quarry Lane, c.230m from the former stone quarry, there is also a cultural/heritage association with the quarrying industry which has shaped the development of Beer. There is possible archaeological interest lying within any artefacts scattered adjacent to a lithic working site. Overall, heritage impact is assessed as medium where there are no significant impacts that could not be mitigated.

Ecology

Site comprises pasture/scrub and mature boundary hedgerows/hedgebanks and trees. Beer Quarry and Caves Special Area for Conservation (SAC) and Site of Special Scientific Interest (SSSI) lies in close proximity (c220m) to the west and in an area used by foraging bats, within the Consultation, Sustenance and Landscape Connectivity Zones. Also lies within 100m of Bovey Lane Fields County Wildlife Site (species-rich unimproved grassland) and opposite (across Quarry Lane) from areas identified on both priority habitat inventory and as nature recovery network, comprising 'additional' (no main) habitat, interspersed with areas of deciduous woodland/forest. No designations within/overlapping the site. At this stage, significant moderate adverse impact predicted.

Accessibility

The site includes 9 community facilities and services within 1600m. This includes an hourly or better bus service, primary school, convenience shop(s), post office, community hall, pub(s), open space/allotment, GP and children's play area. There is limited capacity at the primary school however as noted by the Local Education Authority. The majority of these facilities are within the village centre to which there is a direct safe walking route on pavements from immediately opposite the easternmost end of the site.

Other constraints

Although the site frontage along Quarry Lane is relatively flat, there is steep topography within the site, with gradients as steep as 1:3. The site is not within but close to an area of floodzone 2/3; it is not subject to surface water flooding. It is within a drinking water source protection zone 2 and Mineral Consultation Area. The site comprises Grade 3 agricultural land, which may include best and most versatile land (3a).

Within Green Wedge in adopted Local Plan 2013-31 or made Neighbourhood Plan?

No

Opportunities

None identified.

Yield (number of dwellings or hectares of employment land)

35

Contribution to spatial strategy

Delivering this site would be consistent with the spatial strategy for Beer as a Service Village to allow limited development to meet local needs.

Should the site be allocated?

No

Reasons for allocating or not allocating

Primarily for reasons of landscape impact and intrusion in to the countryside, combined with heritage and ecology concerns.

If whole site is not suitable for allocation, could a smaller part be allocated?

No it is unlikely that a reduced area would overcome the issues identified.

Site details

Settlement: Plymtree

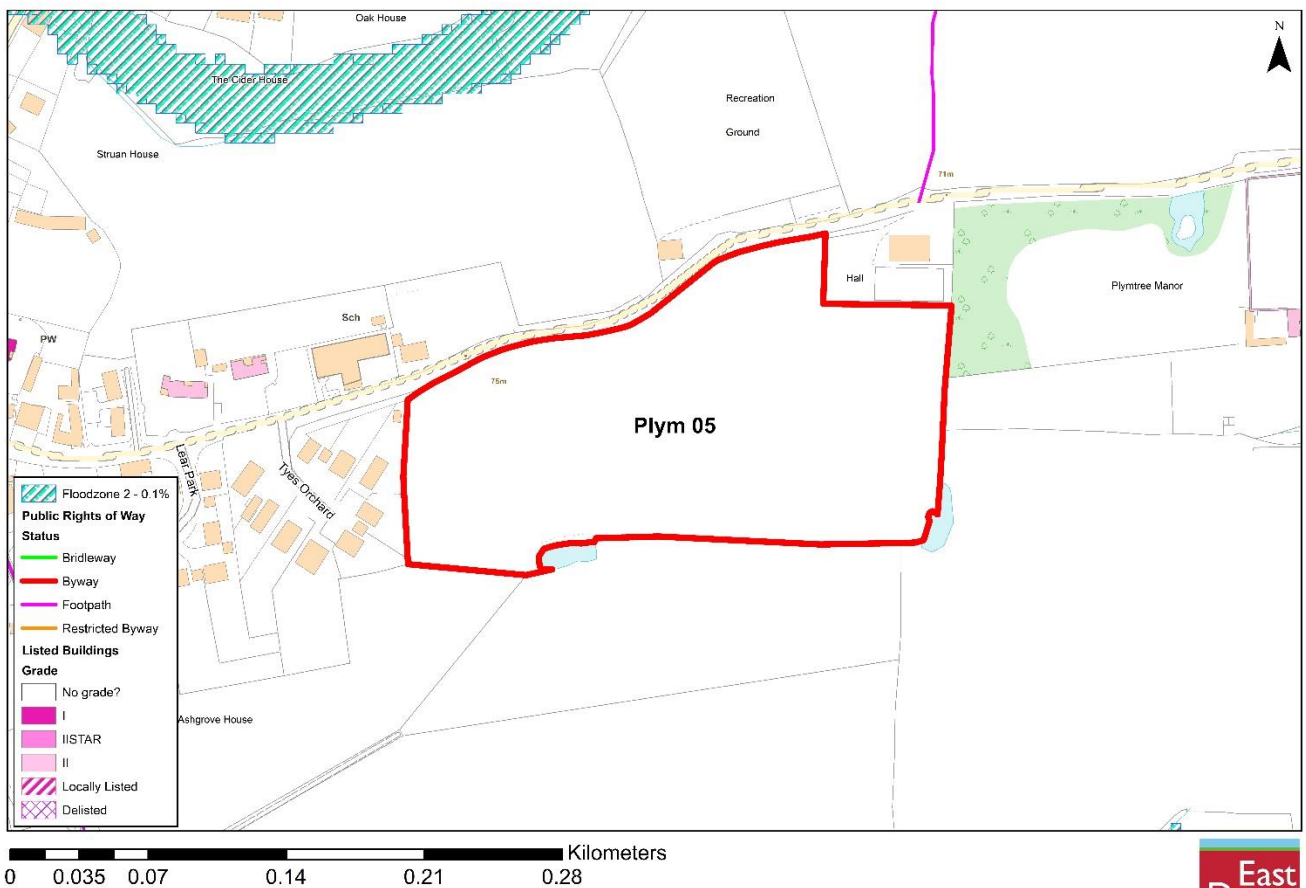
Reference number: Plym_05

Site area (ha): 3.29

Address: Land West of the Village Hall

Proposed use: Residential

Site map



Site Assessment Summary and Conclusion

Infrastructure

Plymtree Primary has some capacity to support development, but not to accommodate all of the potential development. Transport costs to the secondary school would apply.

Landscape

Medium impact. Existing development on one side provides some context of built form, and the presence of mature hedgerows and trees lessen visibility over parts of the site. However the site has a close relationship with surrounding countryside.

Historic environment

Medium- no significant effects which cannot be mitigated. An impact is predicted, but would not compromise the asset(s) cultural heritage value to the extent that the attributes that led to its designation, or ability to understand or appreciate its value, are diminished or compromised. Mitigation may make the impact acceptable, this is likely to be in the form. The overall significance of the asset would not therefore be materially changed.

Ecology

Minor adverse effect predicted (not significant)

Accessibility

The site is within 1,600 metres of 4 or more different local facilities but over 1,600 metres from a train station or bus route with an hourly or better service

Other constraints

Within Green Wedge in adopted Local Plan 2013-31 or made Neighbourhood Plan?

No

Opportunities

Yield (number of dwellings or hectares of employment land)

43

Contribution to spatial strategy

Plymtree is a service village in the emerging Local Plan settlement hierarchy.

Should the site be allocated?

No

Reasons for allocating or not allocating

The site is a significant greenfield site which contributes to the setting of the adjacent listed Manor House and its formal gardens. It is located on the periphery of the village (albeit the village hall is located beyond it) and would extend built form into the open countryside.

If whole site is not suitable for allocation, could a smaller part be allocated?

No

Site details

Settlement: Tipton St John

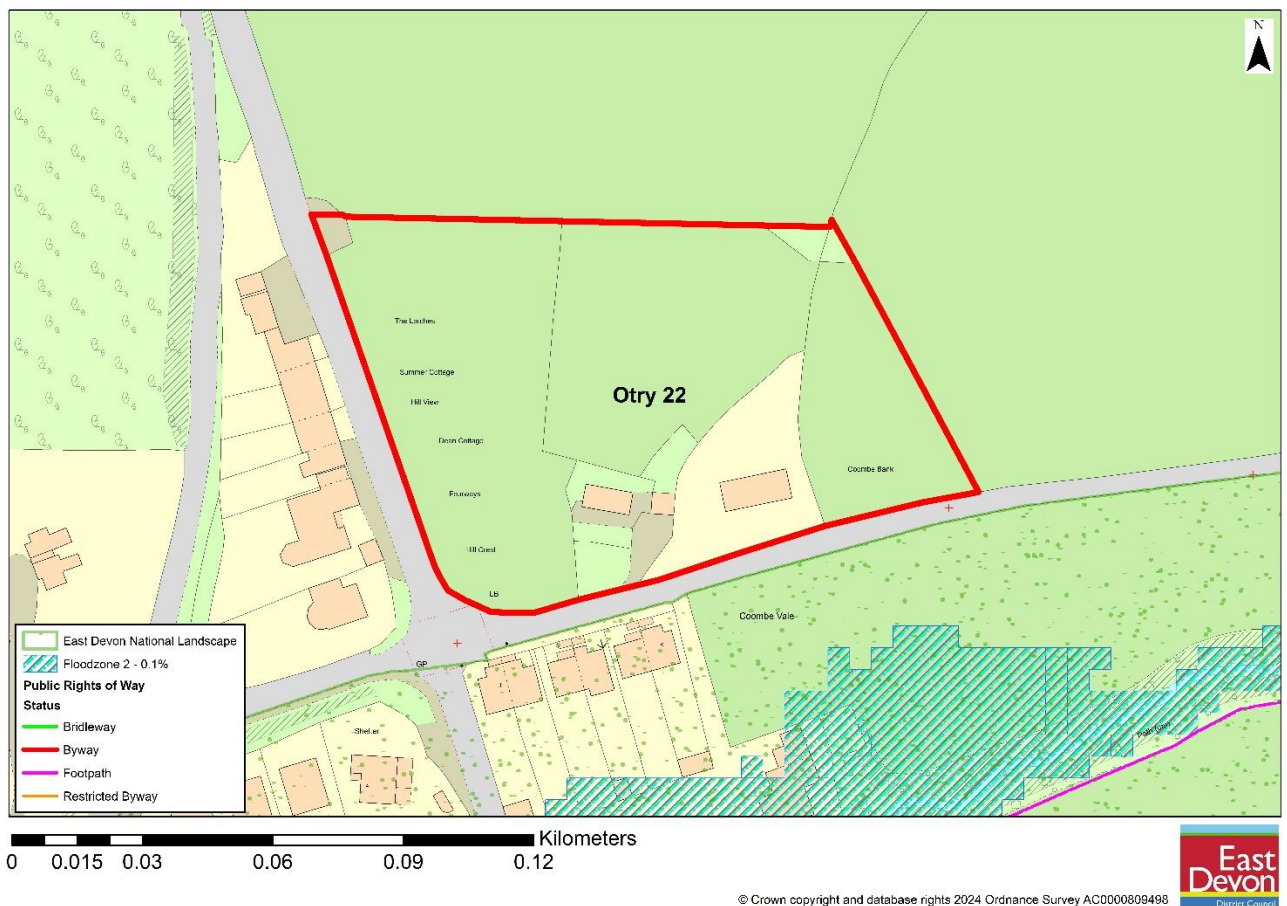
Reference number: Otry_22

Site area (ha): 0.97

Address: Combe Bank

Proposed use: Residential

Site map



Site Assessment Summary and Conclusion

Infrastructure

This site can be accessed via the 'main' road, with the 30mph speed limit extended. Concerns as the current Tipton St John primary school buildings are located in the floodplain. DCC are trying to find a site to relocate the school out of the floodplain. Currently the majority of children come from Sidmouth or Ottery St Mary - so development could lead to a push back to these schools which have limited capacity. Any significant development within the village should consider the requirement for a new

primary school site. Additional secondary capacity required and transport costs would apply. The Kings School academy has previously clearly indicated it will not expand unless with significant investment and potentially new school buildings.

Landscape

Medium-High. An enclosed site, surrounded by hedgerows on most sides. Topography and sloping site mean that the site sits higher than the adjoining road and development is therefore likely to be more visible. Long range intervisibility from the AONB to the south east is likely. New road access is needed, so a hedgerow would need to be removed and this would open the site up to views from the road. Long distance views of hills looking out from the site.

Historic environment

Low: no concerns identified on current evidence, although archaeological mitigation measures may be required. No impact upon an asset is predicted or, if an impact is predicted, the cultural heritage value of the asset(s) would be unaffected.

Ecology

Minor adverse effect predicted (not significant)

Accessibility

The site is within 1600m of 4 or more facilities including a school (although this is proposed to be relocated outside the village), a hall, a pub and a shop. There is not a regular bus service.

Other constraints

Within Green Wedge in adopted Local Plan 2013-31 or made Neighbourhood Plan?

No

Opportunities

Yield (number of dwellings or hectares of employment land)

29

Contribution to spatial strategy

Tipton St John is a service village in the emerging Local Plan settlement hierarchy, however it will lose this status if the school closes

Should the site be allocated?

No

Reasons for allocating or not allocating

The site is a greenfield site which would extend into open countryside. There is no other development on this side of the road. Development would be visible from a considerable distance and negatively impact on the AONB.

If whole site is not suitable for allocation, could a smaller part be allocated?

No

Report to: **Strategic Planning Committee**

Date of Meeting: 5 March 2024

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



Topic paper relating to town centres, retail and sequential test in the new Local Plan

Report summary:

At the 7 September 2021 meeting, this committee agreed in principle that the emerging local plan should continue to take a policy approach which will support the positive appearance and active use of town centres, ensuring they are vital and viable. Members are now asked to consider a topic paper explaining the proposed approach to be taken and establishing up to date Town Centre Area boundaries and Primary Shopping Area boundaries. It is intended that the proposed boundaries, supported by the assessment work, be subject to public consultation in Spring 2024.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

1. That Strategic Planning Committee endorse the topic paper supporting the policies of the Local Plan, set out in appendix 1 of this report.
2. That Strategic Planning Committee agree that the draft Town Centre and Primary Shopping Areas, drawn in accordance with the methodology set out in the topic paper, be subject to public consultation.

Reason for recommendation:

To ensure that Town Centre and Primary Shopping Areas are based on a logical and transparent assessment process and that the public are given an opportunity to comment on the proposals as part of the local plan production process.

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: Medium Risk; It is important that we set out how Town Centre and Primary Shopping Area boundaries are to be defined to ensure a rational process is followed and can subsequently be justified. It is important that the public are given the opportunity to provide feedback in response to the draft proposals.

Links to background information

See links in Appendix 1.

Link to Council Plan

Priorities (check which apply)

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

1. Introduction

1.1 The emerging East Devon Local Plan will contain policies to ensure that East Devon’s town centres continue to thrive and meet the everyday shopping, leisure and service needs of local residents and visitors. This report seeks Member endorsement of the attached topic paper which explains the approach taken to the retail and town centre policies and sets out the boundaries within which these policies will apply. Members are asked to agree that the boundaries be subject to public consultation in March/April 2024.

1.2 Based on size, population and shopping facilities, East Devon has eight towns:

- Axminster;
- Budleigh Salterton;
- Cranbrook;
- Exmouth;
- Ottery St Mary;
- Honiton;
- Seaton; and
- Sidmouth

which are assessed in the report attached at Appendix 1, along with the small town/large village of Colyton and the village of Beer which both have an extensive range of shops for their size. The Local Plan establishes a hierarchy of settlements based on their role and function- tiers one and two comprise settlements with a range

of shopping facilities but not all of the tier 3 and 4 villages contain a range of shops and those that don't are not the focus of the report.

- 1.3 Each of these towns support a town centre (although at Cranbrook the planned centre is not yet fully established). Colyton is the smallest of the East Devon towns (it could be considered a large village) and it has the least facilities of the centres listed. The village of Beer, although slightly smaller than Colyton, actually supports more shops, with a number of these most likely to be viable on account of the busy tourist trade.
- 1.4 As identified by the Government nationally, the role and function of East Devon's town centres is shifting away from retail uses. The last ten years has seen the decline of traditional shops selling comparison goods. These are products which are purchased infrequently, such as white goods, household items and clothing where consumers want to compare a range of items to get the best value and quality. These products can often be bought more conveniently online. This can be quick and convenient but it reduces the viability of physical shops and in turn reduces the availability of goods and services to those without the internet, without electronic banking or without the means to access alternative out-of-town shops.
- 1.5 Whilst East Devon's High Streets are still relatively vibrant (there are fewer vacant units and more independent shops than the national average 10.3 %- (High Streets and Town Centres 2030 report <https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/1010/report-summary.htm>) the traditional anchor town centre uses such as banks, clothing shops and pubs have closed many outlets. Where vacant shops have been taken over, they are often filled by cafes and coffee shops and health and beauty businesses – nail salons, hairdressers, tattoo parlours and barbers – all offering experiences rather than products. Higher numbers of vacant units and new uses with 'blank' frontages or visits by appointment are unattractive to shoppers and reduce the interest and bustle generated by diverse window displays enticing passers-by, although by-appointment businesses can be an excellent way to bring upper floors into use.

2 Local Plan Proposals

- 2.1 Currently, the adopted Local Plan Policy E9 Town Centre Vitality and Shopping Areas provides the overarching policy relating to retail provision in the current defined town centres. Policy E10 establishes Primary Shopping Frontages. These are areas within which permission will not normally be granted for the change of use of ground floor premises from retail to non-retail uses unless it can be demonstrated that this would not be harmful to the existing character or primary shopping function of the area. In addition, Policy E11 requires a sequential approach to be taken to ensure that town centres remain the preferred location for new retail development. Other policies address smaller, neighbourhood centre shops, rural retail and loss of village shops and services.
- 2.2 The NPPF has relaxed the previous requirements for town centres to focus mainly on retail use and now allows changes between uses and encourages housing and

activities such as leisure, community, offices and healthcare alongside traditional shopping.

In Winter 2022 “Strategic Policy 56- Town Centre hierarchy, sequential approach and impact assessment” and “Policy 57- Town Centre development” were subject to consultation as part of the draft new Local Plan. Policy 56 is a strategic policy because it establishes the network and hierarchy of centres. Maintaining the vitality and viability of the town centres in East Devon is a strategic priority in the plan. This policy is also the starting point for the suite of non-strategic policies on town centres and primary shopping frontages, local shops and services, and rural shops.

- 2.3 Policy 57 takes a positive approach to the growth, management and adaptation of the town centres. As part of a positive strategy for the future of each town centre, the Local Plan defines their extent and makes clear the range of uses that are acceptable within them.
- 2.4 This consultation referred to the Town Centre area and Primary Shopping Area (which in most cases are one and the same due to the compact nature and concentration of retail uses) but did not show the boundaries on the Policies Map. If Members agree, the boundaries (as set out in the report at Appendix 1) will be subject to a further consultation in Spring 2024.
- 2.5 It should be noted that the criteria-based policy relating to Primary Shopping Frontages (E10) in the adopted Local Plan was reviewed and considered to be out of date given the change of use now allowed by permitted development rights. We have now taken on board the consultation responses received during last Winter’s consultation which stressed the importance of keeping frontages up to date, the need for a policy approach that sought to retain a certain proportion of retail uses in the town centres and concerns that historic features will be lost during conversion and has addressed these matters through other policies.
- 2.6 The attached report also addresses the potential impact of out of centre retail development and proposes that a lower than nationally prescribed, 500sqm, threshold for retail impact assessments be applied (as it currently is in the adopted Local Plan) but the NPPF default threshold of 2500sqm be applied to other types of development.

3 Public Consultation

- 3.1 It is proposed that public consultation on various local plan designations and allocations, including Town Centre and Primary Shopping Areas, will be undertaken as soon as possible after receiving SPC approval. Such consultation will last for a minimum of 6 weeks.
- 3.2 The suggested text and maps for the consultation are overleaf (these may be subject to minor amendments). The strategic policy does not establish policy area boundaries but does explain our approach and set out the settlements to which these will apply, hence it’s suggested inclusion in the consultation. Other retail related policies, for example those supporting provision of local-scale neighbourhood shops and facilities and preventing loss of shops in small settlements, are criteria based and do not have associated maps, so are not subject to this consultation.

East Devon Local Plan 2020 to 2040

Preferred Options Reg. 18 Further Consultation Draft Plan

Spring 2024

We consulted on a draft local plan from November 2022 to January 2023 that referred to Town Centre Areas and Primary Shopping Areas. At that stage we suggested possible policy wording but did not show proposed boundary lines on maps. We are now consulting on:

- The Policy Wording (this has been revised from the previous consultation)
- Town Centre Area Boundaries
- Primary Shopping Area Boundaries

In considering these we would encourage you to look at the consultation [commonplace-reg-18-final-071122.pdf \(eastdevon.gov.uk\)](https://www.eastdevon.gov.uk/commonplace-reg-18-final-071122.pdf) as this sets out the context for the policy and also to read our background technical papers - [insert link \(the topic paper which includes the methodology and full assessments\)](#).

The idea behind Town Centre Areas and Primary Shopping Areas is to protect important services and facilities at the heart of local communities. These policies will only apply to the main towns and villages with a large range of shops and services; other policies in the plan will protect shops and services elsewhere.

The Strategic Policy below sets out the settlements where town centre areas will be identified and the Town Centre Area and Primary Shopping Area policies will apply. As well as shops, these areas will offer a wide range of facilities often including: leisure and entertainment; sport and recreation; offices; cultural spaces and tourism development which are essential for local communities. In order to help town centres to thrive, we will not usually allow larger scale town centre uses (based on national planning policy) to be developed elsewhere if town centre locations are available. The policy also explains how these applications will be dealt with. We welcome your views as to whether the policy wording is appropriate:

Strategic Policy xx – Town centre hierarchy, sequential approach and impact assessment

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

- Tier one Town Centre: **Exmouth**
- Tier two Town Centre: **Axminster**, Cranbrook (this is subject to the Cranbrook Plan policies), **Honiton, Ottery St Mary, Seaton, Sidmouth**
- Tier three Local Centre: Broadclyst, **Budleigh Salterton, Colyton**, Lympstone, Woodbury
- Tier four Village Centre: Clyst St Mary, Uplyme, **Beer**, West Hill, Newton Poppleford, Feniton, Whimble, Kilmington, Otterton, East Budleigh, Stoke Canon, Tipton St John, Musbury, Sidbury, Chardstock, Broadhembury, Payhembury, Branscombe, Plymtree, Dunkeswell, Hawkchurch, Exton. Settlements shown in bold text have defined Town Centre Areas to which town centre development policy will apply.

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

- The proposal accords with (satisfies) the sequential test as set out in the NPPF, and

flexibility has been demonstrated on issues such as the format and scale of development.

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

Edge-of-centre¹ and out-of-centre sites, which satisfy the sequential test, should be accessible by public transport, bicycle and foot and well-connected to the centre by these modes. Routes to the centre should be clearly signed. In order to ensure that land is retained for the benefit of the local economy, permitted development rights allowing changes to alternative uses will be withdrawn.

Over recent years the national rules have been relaxed to allow a wider range of activities in town centres and to allow buildings to change between uses without the need for planning permission. This, combined with changes to the way that people shop and greater online shopping and home deliveries, has led to fewer shops and leisure uses in town centres. We are still very keen to ensure that town centres offer a wide range of good quality shopping, along with other uses and activities to draw in customers and visitors and ensure that everyone is able to meet their day-to-day shopping needs. We have identified areas within town centres where most shops are located and where it is particularly important to maintain retail uses. We will resist changes to non-retail or leisure uses within these 'Primary Shopping Areas'. It should be noted that in some cases, the Town Centre Area and the Primary Shopping Area share the same boundary.

We have drafted new policy wording for the town centres, as set out below. This explains what we would allow within these areas. We welcome your views as to whether the policy wording is appropriate:

Policy xx - Town Centre development

Town Centre Areas and Primary Shopping Areas are defined on the Proposals Map for the tier one and two towns (excluding Cranbrook which is subject to the policies of the Cranbrook Plan) and the settlements of Budleigh Salterton, Beer and Colyton.

To ensure that Town Centre Areas are vital and viable, proposals for development will be permitted where they improve the quality and/or broaden the range of retail and leisure facilities and enhance the role of the town centres as sustainable shopping and leisure destinations.

Proposals must not undermine the shopping character or visual amenity of the town centre, either alone or cumulatively, or adversely affect the amenity of the surrounding area through noise, smell, litter, traffic or disturbance arising from operating hours.

Development proposals should make a positive contribution to the townscape of the centre in which it is proposed.

Opportunities to enhance the natural and historic environment will be sought wherever possible.

¹ Edge-of-centre locations are defined for retail purposes, as locations that are well connected and within 300 metres of the Primary Shopping Area. For all other main town centres uses, it is a location within 300 metres of a town centre boundary, however for office development this includes locations outside of the town centre but within 500 metres of a public transport interchange. Local circumstances should be taken into account when determining whether a site falls within the definition of edge-of-centre.

High quality, safe routes through the town centre will be sought wherever possible, both for pedestrians and cyclists (to include properly designed and located cycle parking) and to act as well designed, connected, diverse natural corridors for wildlife.

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

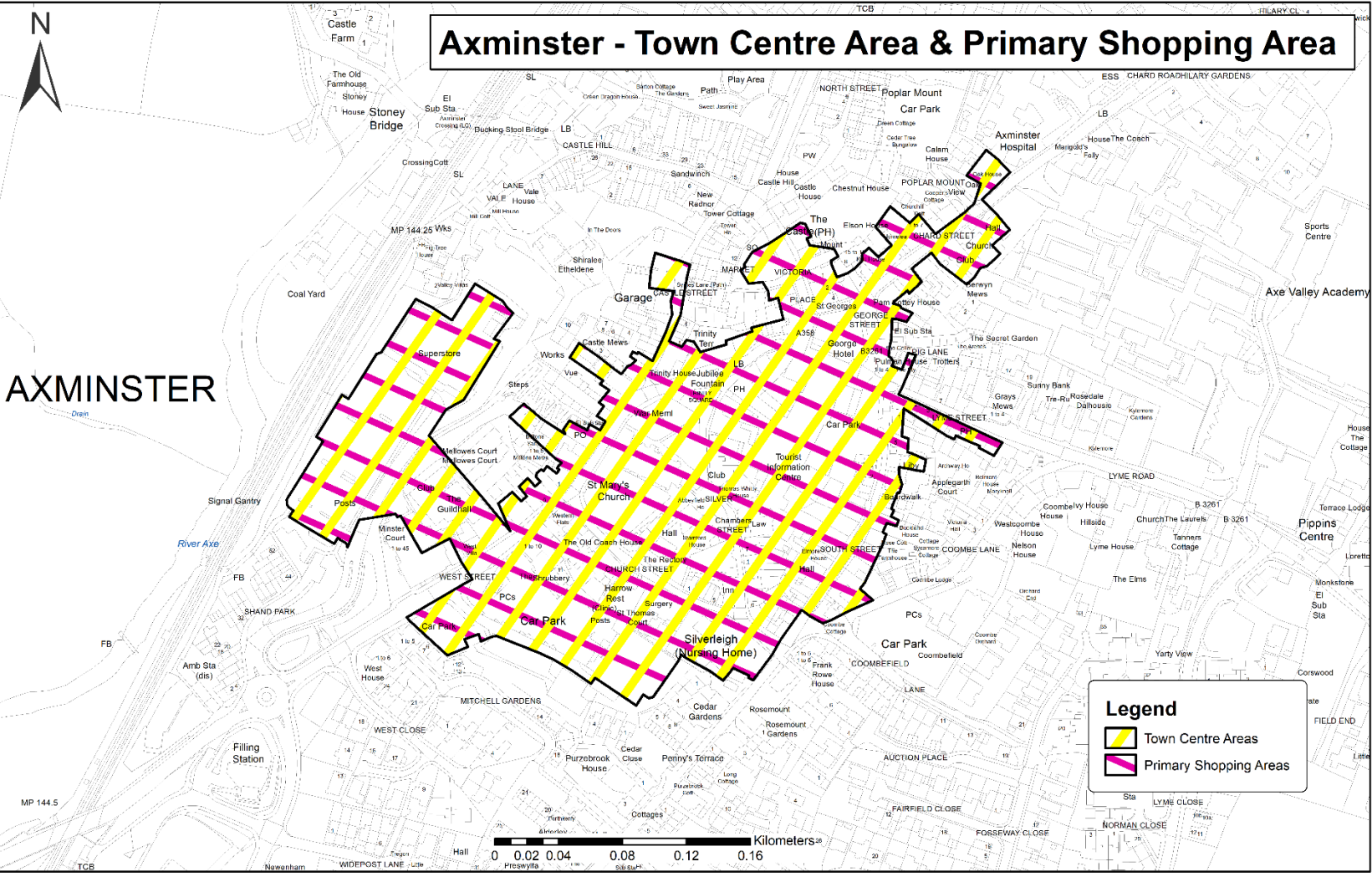
Where change of use of a shop is permitted within the town centre and the shopfront, entrance or other features are considered to be of architectural or historic merit they should be retained and incorporated into the new development scheme.

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

The maps that follow show the areas of land that we think should be designated as Town Centre Areas and/or Primary Shopping Areas because they are really important in terms of providing shopping, leisure and associated uses at the heart of local communities. We think that development in these should enhance the range and quality of town centre, shopping and leisure facilities.

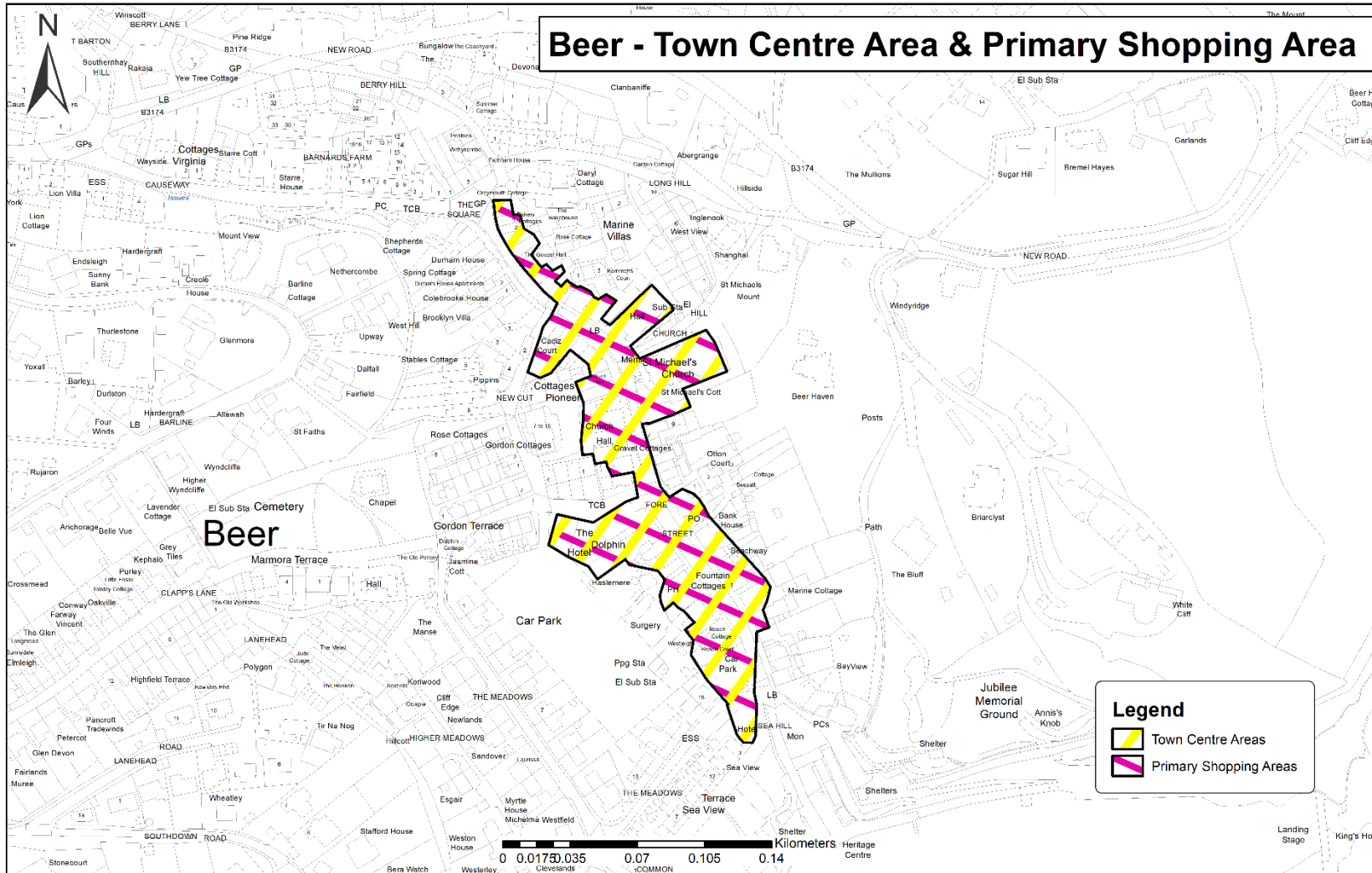
We include maps of the proposed Town Centre Areas and Primary Shopping Areas in the remainder of this report and we would welcome your views on whether you think we have shown appropriate boundaries. If you think that different boundaries would be more appropriate, please tell us where they should go and why.

Axminster - Town Centre Area & Primary Shopping Area



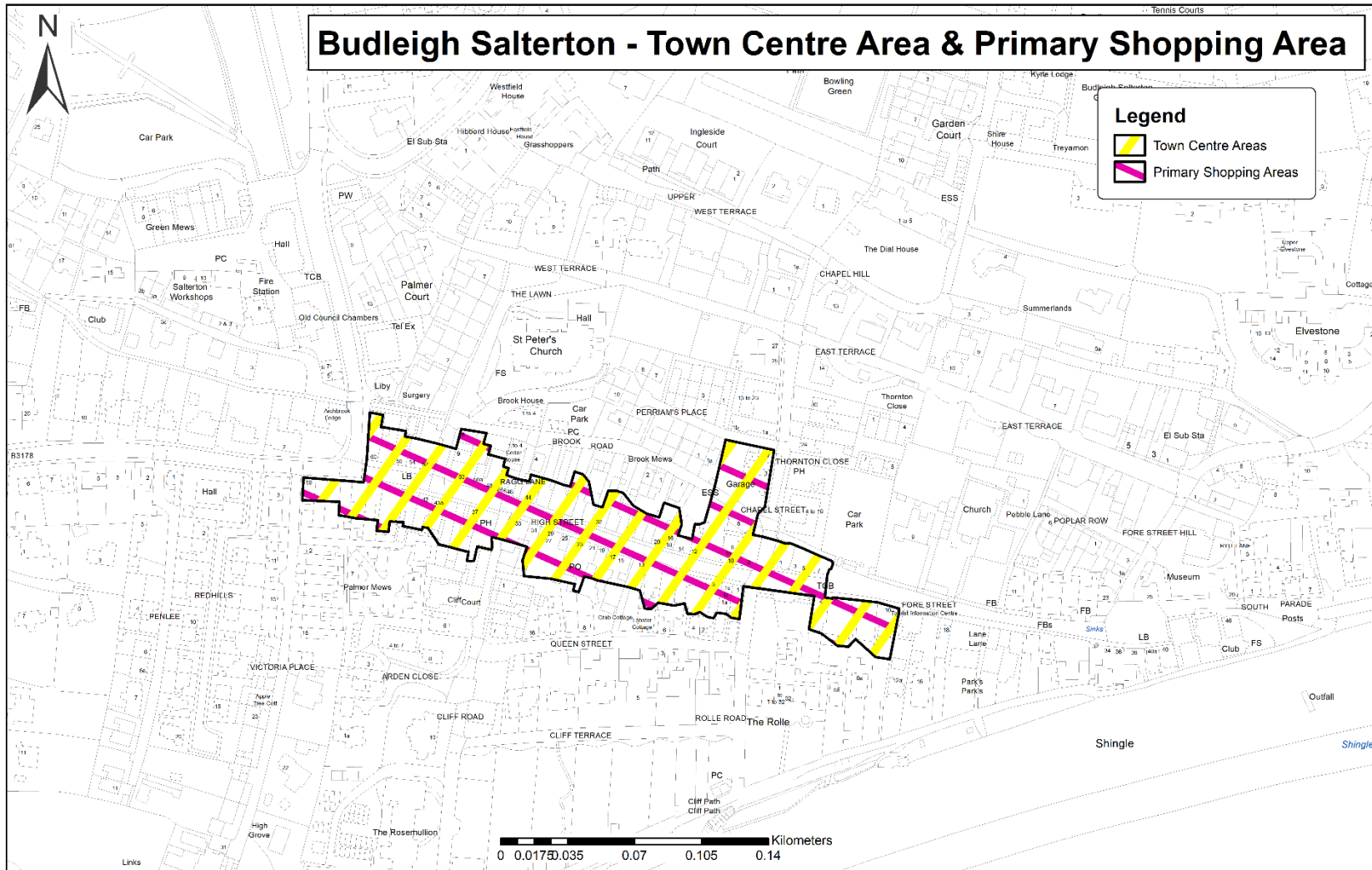
Town Centre Retail Survey - Axminster -

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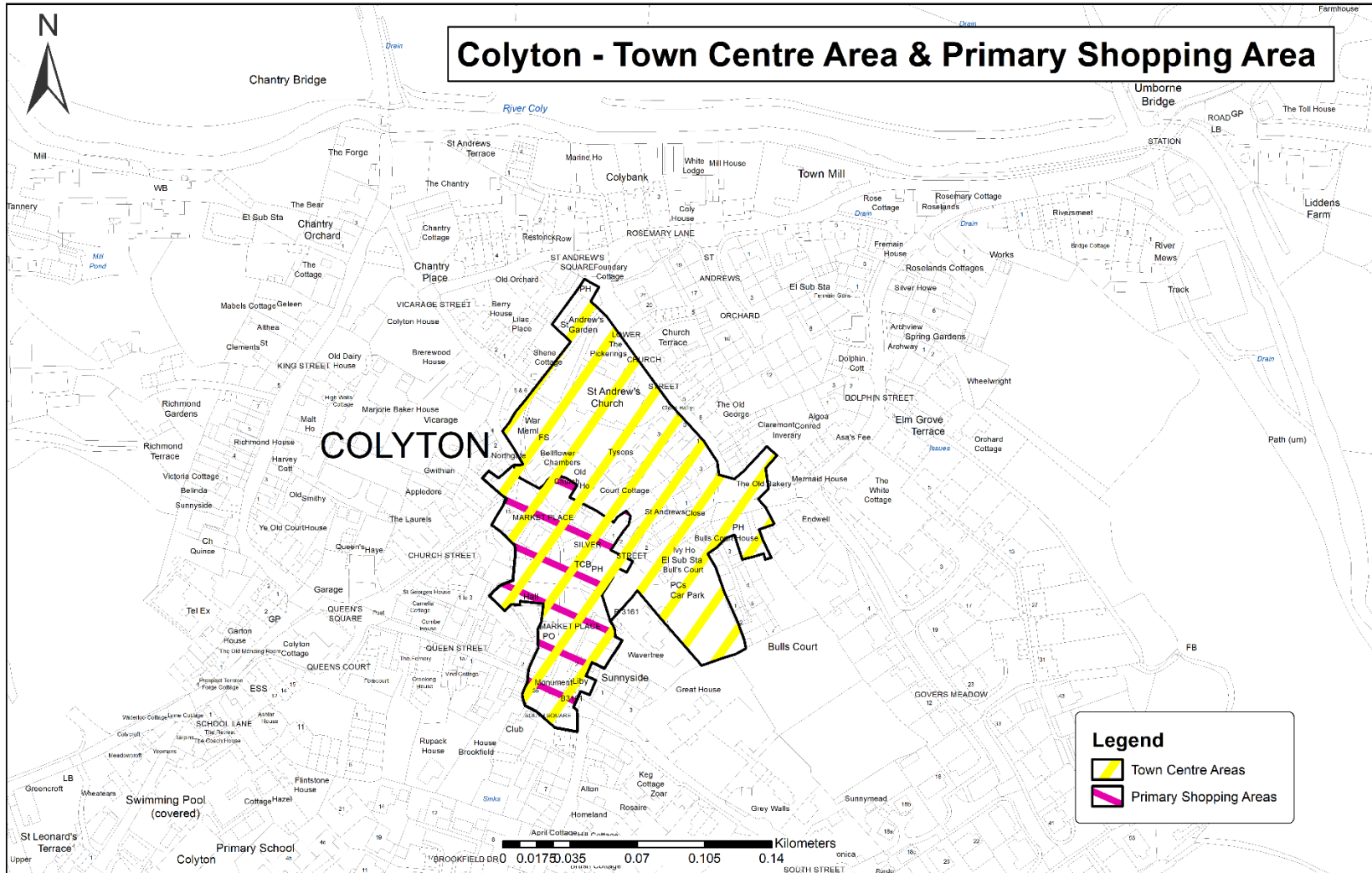
Town Centre Retail Survey

- Beer -

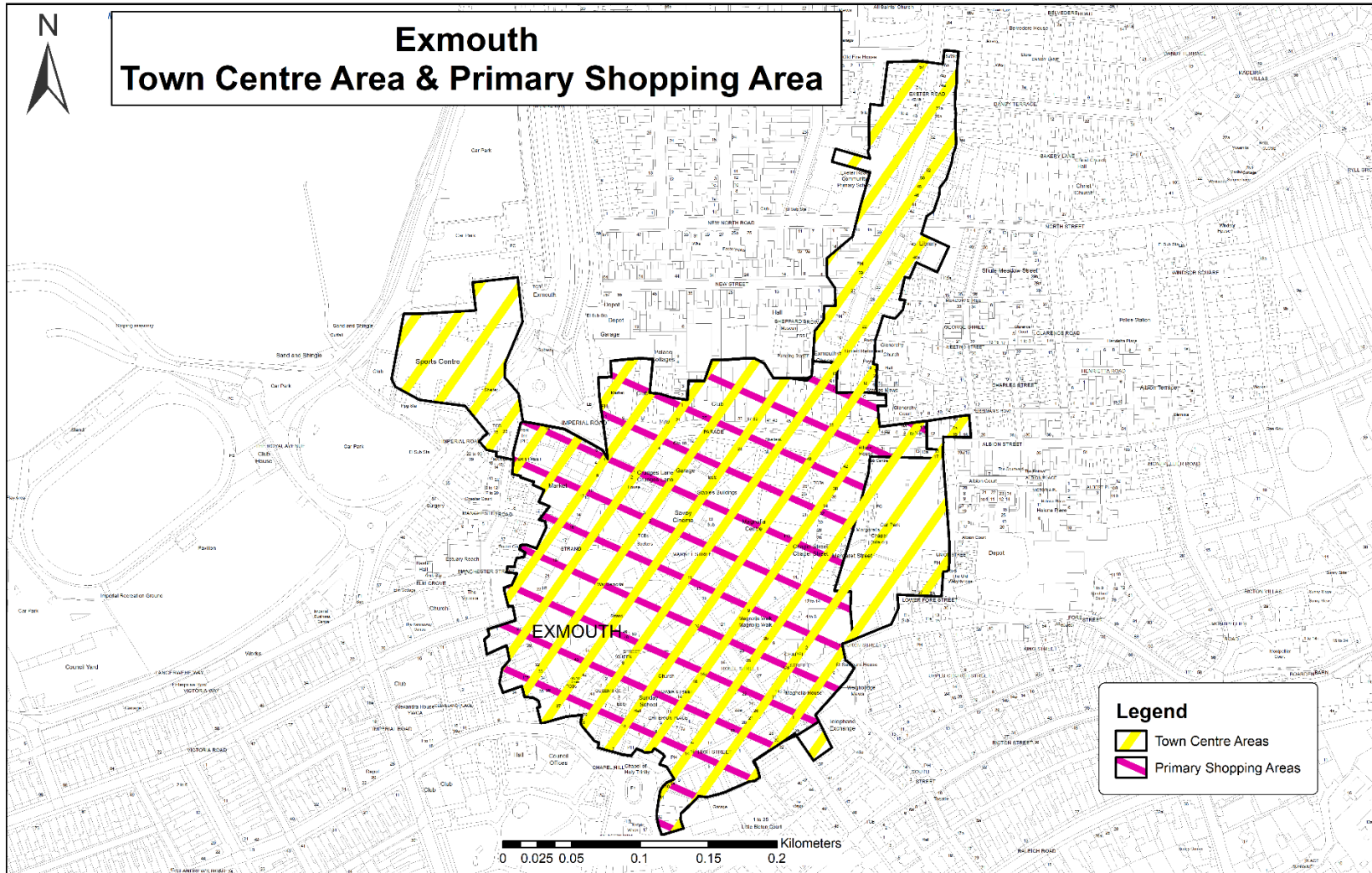


Town Centre Retail Survey - Budleigh Salterton -

Colyton - Town Centre Area & Primary Shopping Area

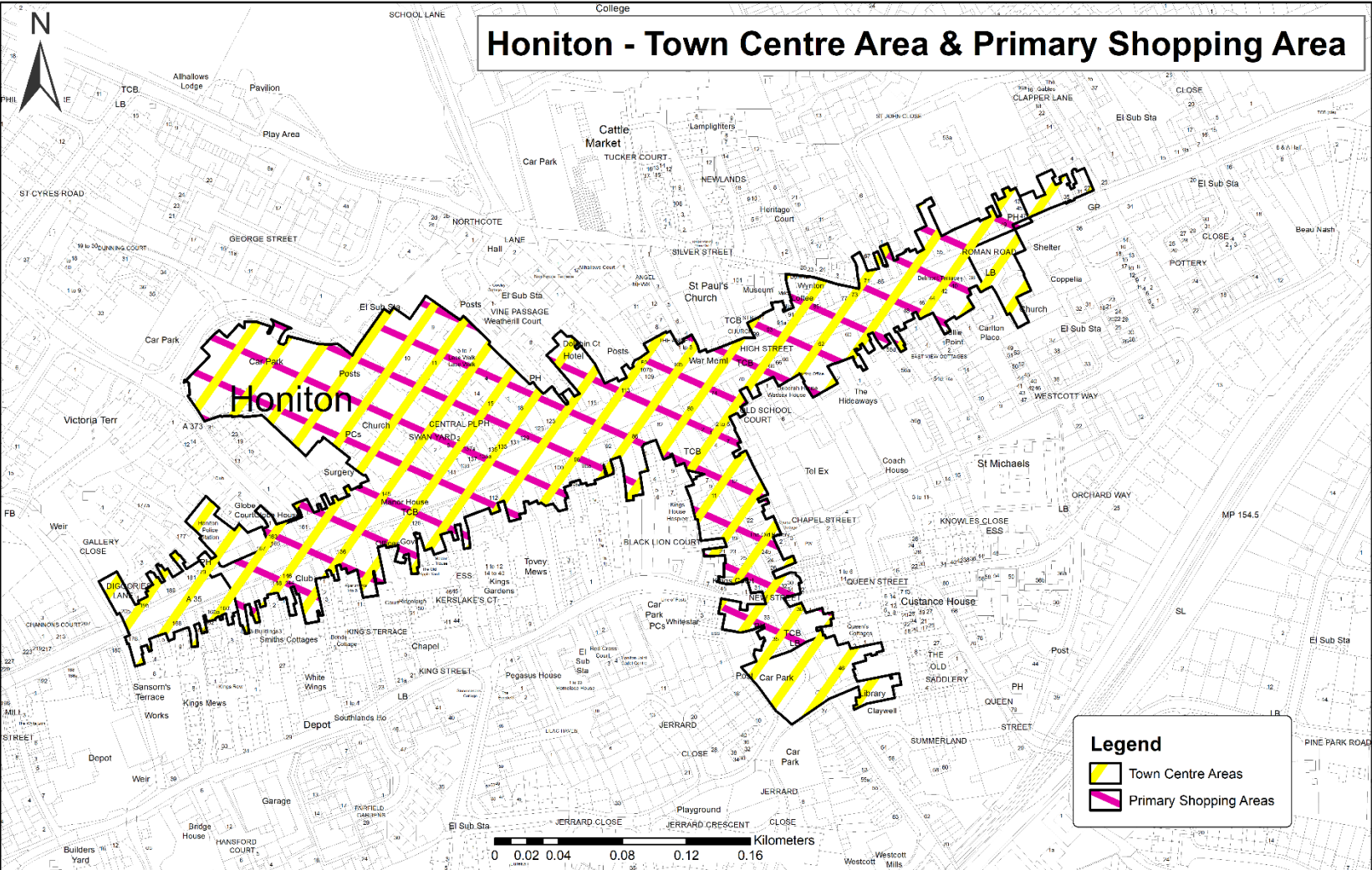


Town Centre Retail Survey - Colyton -



Town Centre Retail Survey - Exmouth -

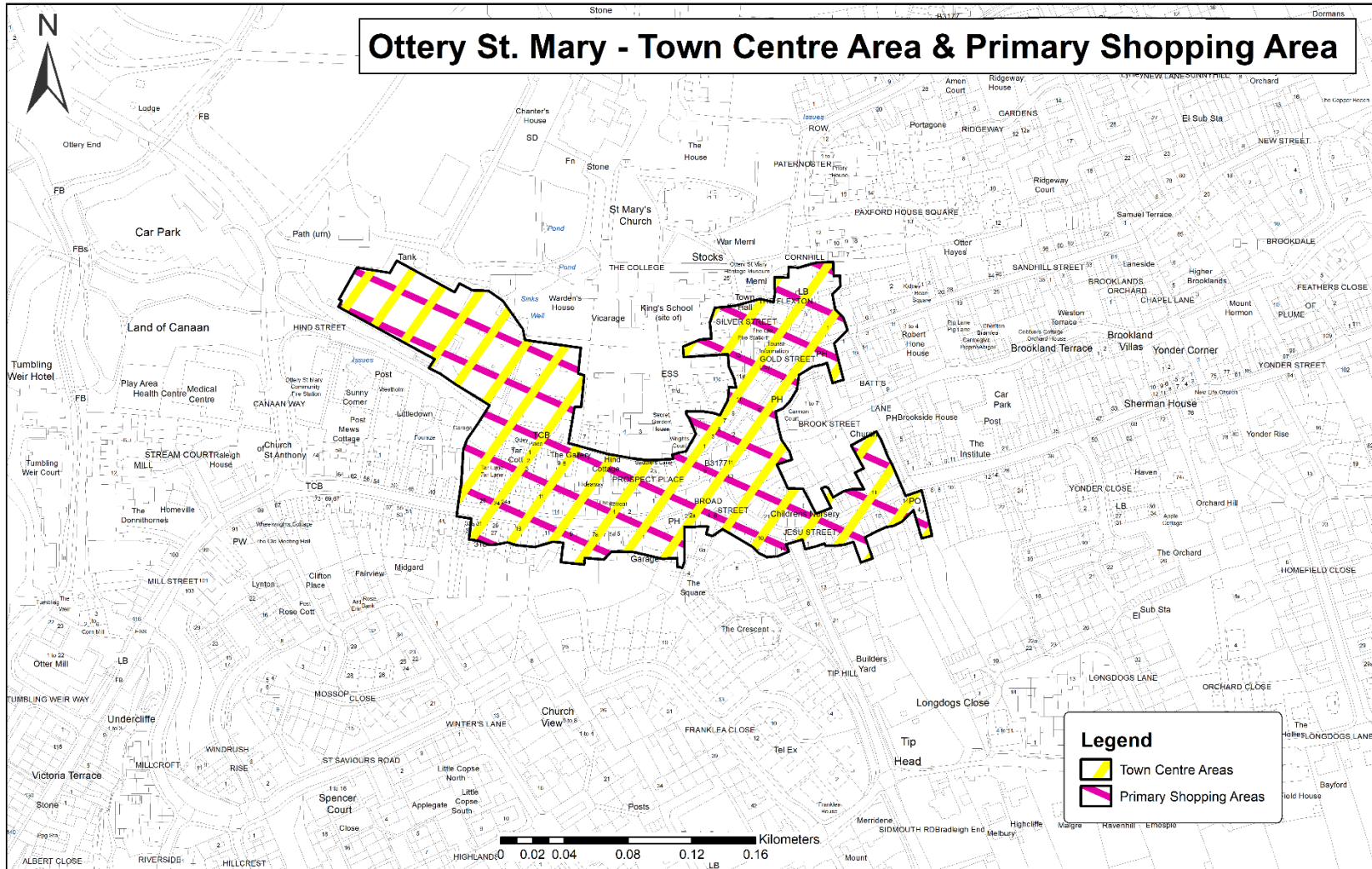
Honiton - Town Centre Area & Primary Shopping Area



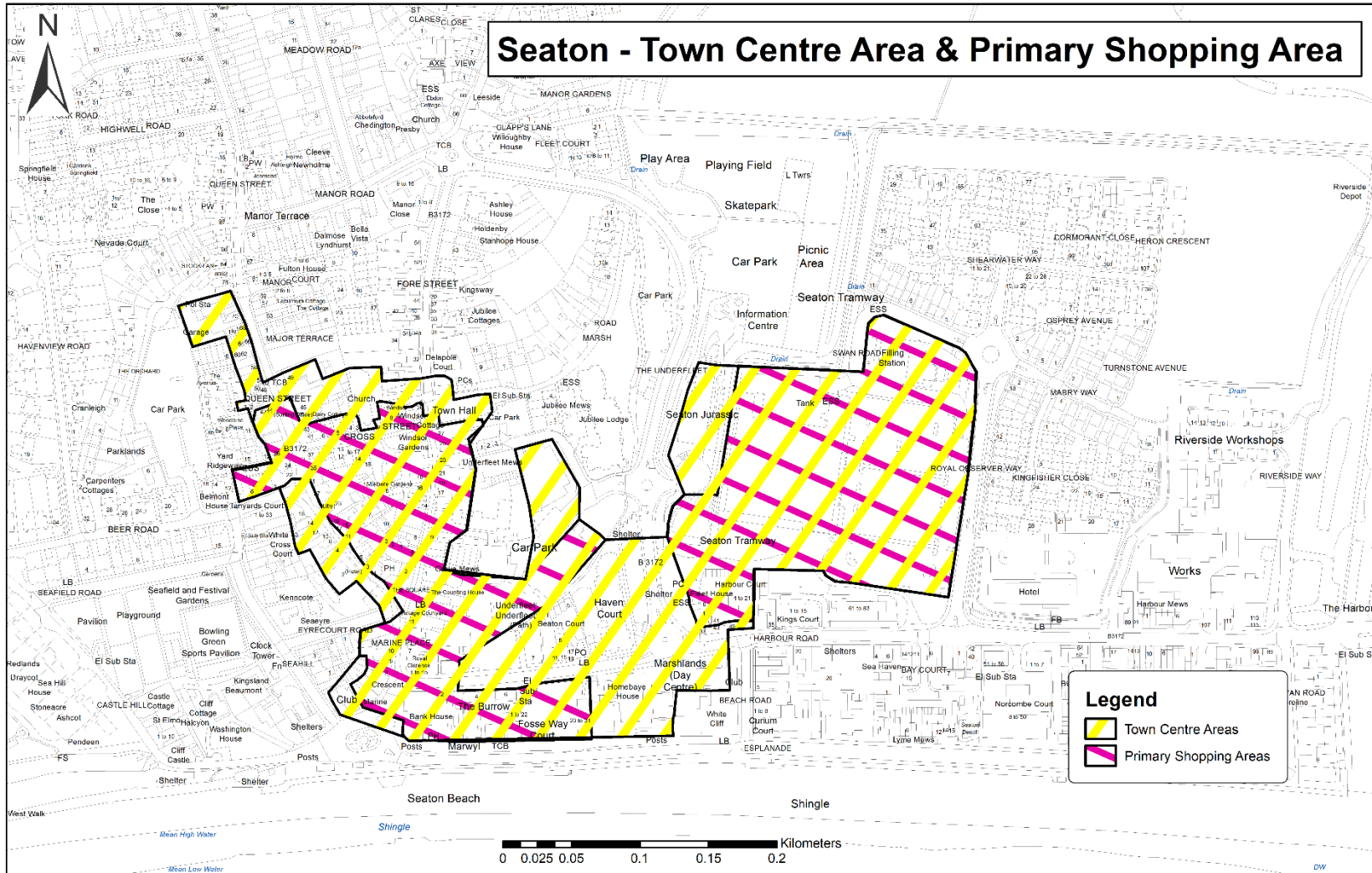
page 78

Town Centre Retail Survey - Honiton -

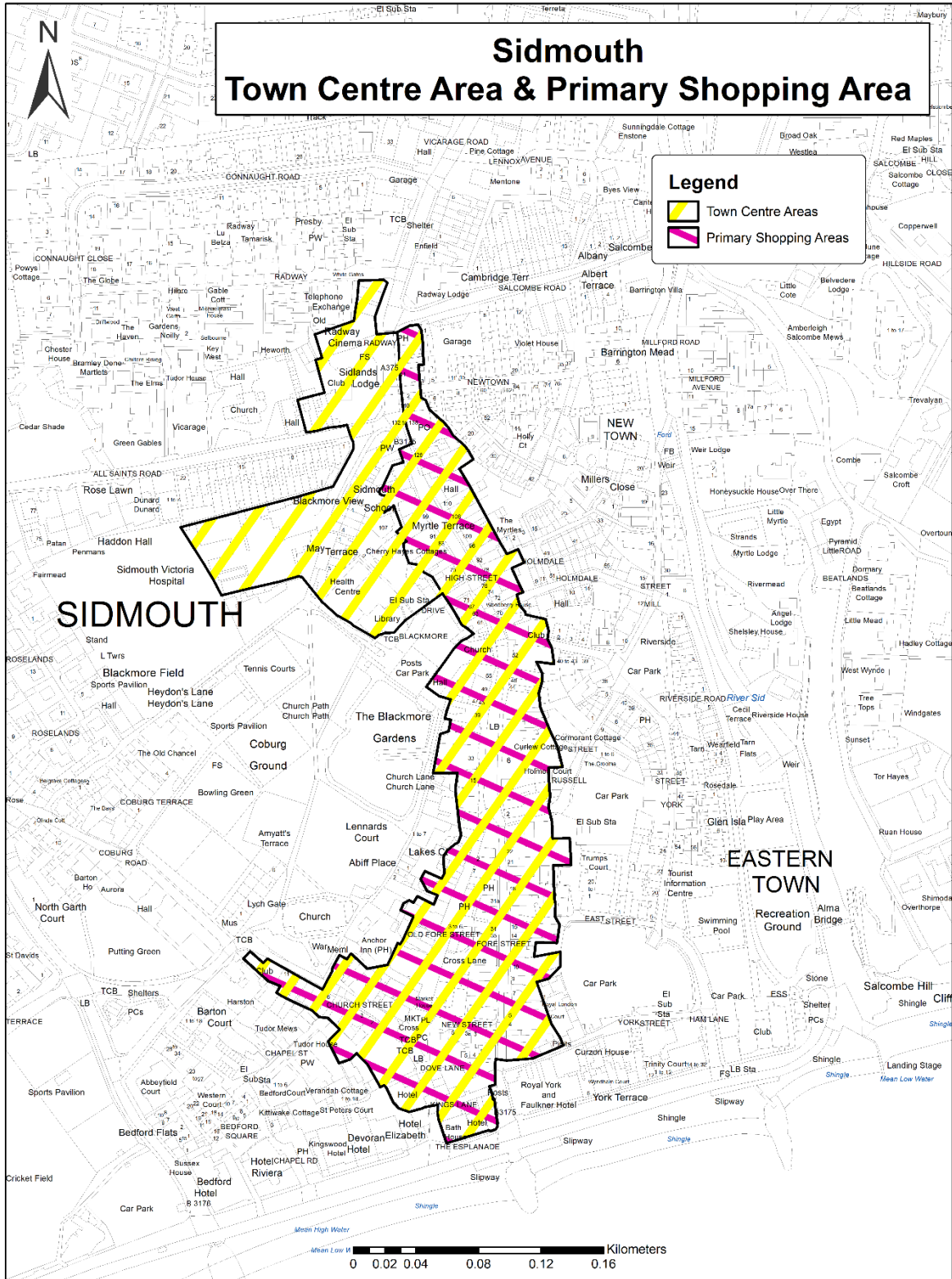
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Town Centre Retail Survey - Ottery St. Mary -



Town Centre Retail Survey - Seaton -



**Town Centre Retail Survey
- Sidmouth -**

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It should be noted that the proposed consultation text and maps may be subject to minor changes prior to the consultation. These will be limited to typographical or other corrections and improvements to the clarity of the maps/text.

Financial implications:

There are no direct financial implication resulting from the report.

Legal implications:

There are no direct legal implications resulting from the report.

East Devon Local Plan

Evaluation of Town Centre and Retail Policy Boundaries and the threshold for the Sequential Test

September 2023

This report evaluates town centre and retail policy boundaries and the threshold at which the sequential test should apply. It will inform the draft of the new East Devon Local Plan.

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1 Introduction

- 1.1 Town centres are literally at the heart of East Devon communities and are essential to ensuring that resident's everyday needs are met as locally as possible. Town centres have always demonstrated resilience to change, overcoming challenges from increased car ownership, out of town retail parks, the rise of supermarkets and an increase in online banking and access to public services, but they now face unprecedented pressure.
- 1.2 Retailing has for many years been the core activity in town centres but the pandemic, on top of loss of footfall due to increasing online purchases and slow recovery from the 2008 financial crisis and recession, has led to widespread concern about the future of town centre shops and facilities, and particularly High Streets.
- 1.3 This topic paper considers the current situation in East Devon and justifies the policies of the emerging Local Plan. It provides an assessment of boundaries for town centre and retail policies and explains why the national sequential test threshold is inappropriate and a lower threshold is justified in East Devon.

2 National Position

National Planning Policy and Government Strategy

- 2.1 Relevant legislation is set out in the overarching Town and Country Planning Act 1990 and the Planning Compulsory Purchase Act 2004.
- 2.2 Local planning authorities are required to address the requirements set out in National planning guidance in preparing their local plans, namely the National Planning Policy Framework (NPPF, December 2023) and supporting National Planning Policy Guidance (NPPG). At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. The NPPF provides that 'planning policies and decisions should support the role that town centres play at the heart of local communities by taking a positive approach to their growth, management and adaptation' (paragraph 85). Table 1 summarises the requirements of the NPPF and NPPG to achieve this.

Table 1 Summary of National Planning Policy Requirements

National Planning Policy Framework Summary	Reference
Define a network and hierarchy of town centres	90 a)
Promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes and reflects their distinctive characters	90 a)
Allow a suitable mix of uses including housing	90 a)
Define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy	90 b)
Retain and enhance existing markets and, where appropriate, re-introduce or create new ones	90 c)

Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead	90 d)
Apply a sequential test to planning applications for main town centre uses that are not proposed in an existing centre	90 e)
Where town centre sites are not available, allocate well connected edge of centre sites and other appropriate sites for main town centre uses	90 e)
Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage housing on appropriate sites	90 f)
National Planning Policy Guidance (NPPG) (as updated 18 September 2020)	
Provide a positive vision or strategy for town centres	2b-002-20190722
Strategies should be based on evidence of the current state of town centres and take full account of relevant market signals and identify relevant sites, actions and timescales. Strategies should be prepared where a town is in decline to manage this positively to encourage economic activity and achieve an appropriate mix of uses.	2b-004-20190722
Improvements to the public realm, transport (including parking) and accessibility should be provided.	2b-004-20190722
The strategy should take full account of relevant market signals when planning for town centres and should keep their retail land allocations under regular review. These market signals should be identified and analysed in terms of their impacts on town centres. This information should be used to inform policies that are responsive to changes in the market as well as the changing needs of business.	2b-004-20190722
The health of town centres should be assessed against defined indicators ¹ .	2b-006-20190722

2.3 The NPPF 2018 removed the expectation for local authorities to define primary and secondary frontages within their town centres.

2.4 The NPPF definitions will be used in this paper. These are set out in Table 2.

Table 2 Most relevant NPPF definitions

Term	Definition
Edge of centre	For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

¹ Defined indicators refers to: proportion of vacant street level property; commercial yields on non-domestic property; customers' views and behaviour; retailer representation and intentions to change representation; commercial rents; pedestrian flows; accessibility; perception of safety and occurrence of crime and state of town centre environmental quality.

Main Town Centre Uses	<ul style="list-style-type: none"> • Retail development (including warehouse clubs and factory outlet centres); • Leisure; • Entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); • Offices; and • Arts, culture and tourism development (including theatres, museums, galleries, or a combination of the two)
Out of centre	A location which is not in or on the edge of a centre but not necessarily outside the urban area.
Out of town	A location out of centre that is outside the existing urban area.
Primary shopping area	Defined area where retail development is concentrated.
Town centre	Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

- 2.5 With regard to their strategy, the Government position, even pre-covid, is that 'transformation' is necessary if town centres are to thrive, but the type of intervention required to achieve this will vary from place to place. Without intervention there are risks:
- Loss of high streets' retail offer/employment
 - Low incentive to invest
 - Rundown image & decay
 - Empty streets
 - Vacuum, fragmentation, hollowing out
 - Loss of the heart of places & communities
- 2.6 In recent years the Government has produced or endorsed a number of proposals for positive transformation. This started with the Portas Review of 2011, which set a vision for the future intended to 'breathe life back into the High Street'. In response to this, in order to enable the High Street to quickly adapt and addressing the problem of vacancy and stagnation, changes to the planning system were introduced in 2015 which allowed for greater flexibility and changes between the use classes as permitted development. This was followed by 'Our Plan for the High Street' as part of the Budget in 2018, which promised Government funding through the 'Future High Streets Fund' in order for High Streets to focus on users 'experience', making them more convenient, acting as a focus for services and engendering a sense of community.
- 2.7 In 2019 the [High streets and town centres in 2030 \(parliament.uk\) report](#) helpfully set out a vision for town centres which will act as:
- Activity-based community gathering places
 - Retail is a smaller part of a wider mix

- Green space, leisure, arts/culture, health & social care services, housing
- Space for social & community interactions

2.8 The [Build Back Better High Streets](#) Paper is the Government's most recent strategy, building on the 2019 vision but also considering how high streets and town centres can adapt and thrive after the COVID-19 pandemic. The plan sets out five key priorities to achieve the vision of having “vibrant high streets where communities are at the heart of place-making; where a mix of commercial and residential uses complement each other; and where businesses large and small feel welcome.” The plan does not provide any major new policy steer or resources to support high streets.

The five priorities are:

Breathing new life into empty buildings;

- Planning flexibilities around change of use; enabling vacant commercial premises to be demolished and a new development right to convert empty shops, restaurants and offices into homes.
- £150m community ownership fund to enable communities to take over local community assets such as pubs, theatres and post offices.
- Encouraging councils to use Compulsory Purchase Orders for more effective land assembly to facilitate growth.
- Intention to reform legislative framework to ensure local areas have access to delivery vehicles to support growth and regeneration.

Supporting High Street businesses;

- Commitment in principle to make temporary pavement licence measures permanent.
- 12 month extension to temporary permissions for off-sales alcohol
- Legislation to ring-fence debt that has been accrued from March 2020 for tenants who have been impacted by covid-19 business closure
- Working with BIDs to improve stakeholder engagement
- Hospitality-led regeneration hubs, with demonstrators
- Green guide for SME retailers

Improving the public realm;

- Focus on accessible and green infrastructure
- Manual for Streets to be published in 2022
- Government to choose 12 non-London local authorities for intensive investment in mini-Holland cycle schemes
- Local transport authorities being asked to produce Bus Service Improvement Plans by the end of October

Creating safe and clean spaces;

- Litter bin grant scheme
- Increased enforcement on litter, graffiti and gum.
- New delivery model for probation service focussed on visible community pay back.

Celebrating pride in local communities.

- Cultural Investment Fund
- Transforming Places Through Heritage programme

- Office for Place to be established by MHCLG focussed on design quality within the planning system.
 - Local celebrations to be led by local authorities to engage communities and local high streets.
- 2.9 Most of the resources to deliver the ‘place’ centred actions above will come from existing announcements including Future High Streets Fund, Welcome Back Fund, Community Ownership Fund, Town Deals and the forthcoming Levelling Up Fund and Community Renewal Fund.
- 2.10 There is a suggestion that further relaxations of guidance on change of use and more encouragement of Local Authorities to use Compulsory Purchase powers for persistently derelict buildings or to progress stalled regeneration schemes will be introduced. Undertaking physical regeneration and site assembly in town and city centres has frequently been a cost prohibitive issue for many Local Authorities – especially if the final uses of any regeneration have lower end use classes and land values than the previous retail use.

Use Classes Order Changes

- 2.11 Complementing the Governments approach to transforming town centres, in recent years there have been changes to the classifications of certain use categories, and the scope for changing use, which is relevant to this report. The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (SI 2020 No.757), which were made on 20 July 2020 and took effect on 1 September 2020, made important changes to the already much amended 1987 Use Classes Order. In summary the Regulations introduced three new use classes:
- Class E (Commercial, business and service) – including retail, restaurant, office, financial/professional services, indoor sports, medical and nursery uses along with “any other services which it is appropriate to provide in a commercial, business or service locality”;
 - Class F.1 (Learning and non-residential institutions) – including non-residential educational uses, and use as a museum, art gallery, library, public hall, religious institution or law court; and
 - Class F.2 (Local community) – including use as a shop of no more than 280 sqm mostly selling essential goods, including food and at least 1km from another similar shop, and use as a community hall, area for outdoor sport, swimming pool or skating rink.
- 2.12 Parts A and D of the original Schedule to the Use Classes Order have been entirely deleted, with Use Classes A1, A2, A3, parts of D1 and D2 subsumed into new Use Class E along with Class B1.
- 2.13 Changes of use within this new Class E will not constitute development and will not require planning permission. This new flexibility is not linked to spatial considerations and therefore will apply both to high streets and all town centre uses located outside of centres. The government has said that the main driver of change has been the need to enable a repurposing of buildings on high streets and town centres. The new Class E allows for a mix of uses to reflect changing retail requirements. It will allow a building to be used flexibly by having several uses taking place concurrently or by allowing different uses to take place at different times of the day. The Government will also allow commercial buildings within the Class E use to be converted into homes via prior approval. Under the new permitted development right, local authorities will only be able to refuse applications on limited grounds including flooding risk, noise pollution and inadequate natural light. Homes produced will have to meet national space standards.

The right will be available on premises of less than 1,500sq m in size, and only for premises that have been vacant for three months prior to the date of applications. Buildings must have been in the E use class for 2 years. In addition, whilst there is additional protection for conservation areas, the permitted development right will still apply in these areas. There will also be additional criteria to assess the loss of health centres and nurseries.

- 2.14 The new concept of 'Local Community' uses – Class F2 – has been introduced to ensure important community facilities are protected through the planning system. Again, changes of use within this class do not require planning permission. Certain uses have now become sui generis uses, with the effect that no changes of use to or from these uses fall within permitted development. These include pub/drinking establishment (A4), hot food takeaway (A5), venue for live music (D2), cinema (D2(a)), concert hall (D2(b)) and bingo hall (D2(c)).

3 East Devon Current Position

- 3.1 Based on size, population and shopping facilities, East Devon has eight towns:

- Axminster;
- Budleigh Salterton;
- Cranbrook;
- Exmouth;
- Ottery St Mary;
- Honiton;
- Seaton; and
- Sidmouth

Which are assessed in this report, along with the small town/large village of Colyton and the village of Beer which both have an extensive range of shops for their size. The Local Plan establishes a hierarchy of settlements based on their role and function- tiers one and two comprise settlements with a range of shopping facilities but not all of the tier 3 and 4 villages contain a range of shops and those that don't are not the focus of this report.

- 3.2 Each of these towns supports a town centre (although at Cranbrook the planned centre is not yet fully established). Colyton is the smallest of the East Devon towns (it could be considered a large village) and it has the least facilities of the centres listed. The village of Beer, although slightly smaller than Colyton, actually supports more shops, with a number of these most likely to be viable on account of the busy tourist trade.
- 3.3 With the exception of Cranbrook, (and to a lesser degree Colyton and Budleigh Salterton) the town centres of East Devon provide facilities to meet most of the everyday needs of the resident populations of those towns and of surrounding rural hinterlands. A range of shops are found in these centres along with supermarkets and a diverse selection of social and community facilities. Independent shops are comparatively common in East Devon towns. For much larger sized shops and a bigger selection, as well as major recreational and cultural venues and such destinations as major sporting facilities, residents of East Devon would need to leave the District (2019 Avison Young study (Retail Assessment)). [Link to the East Devon Website to be added once the evidence is uploaded](#)
- 3.4 As identified by the Government nationally, the role and function of East Devon's town centres is shifting away from retail uses. The last ten years has seen the decline of traditional shops selling comparison goods as these products can often be bought more conveniently online – bulky white goods, electronics, books and increasingly, fashion and footwear. Nationally town centre footfall has reduced by about 30% in the past 10 years

as shoppers increasingly view items in physical shops but purchase through the internet. This can be quick and convenient, but it reduces the viability of physical shops and in turn reduces the availability of goods and services to those without the internet, without electronic banking or without the means to access alternative out-of-town shops.

- 3.5 Whilst East Devon's High Streets are still relatively vibrant (there are fewer vacant units and more independent shops than the national average 10.3 %- (High Streets and Town Centres 2030 report <https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/1010/report-summary.html>) the traditional anchor town centre uses such as banks, clothing shops and pubs have closed many outlets. Where vacant shops have been taken over, they are often filled by cafes and coffee shops and health and beauty businesses – nail salons, hairdressers, tattoo parlours and barbers – all offering experiences rather than products. Higher numbers of vacant units and new uses with 'blank' frontages or visits by appointment are unattractive to shoppers and reduce the interest and bustle generated by diverse window displays enticing passers-by, although by-appointment businesses can be an excellent way to bring upper floors into use.
- 3.6 Currently, the adopted Local Plan Policy E9 Town Centre Vitality and Shopping Areas provides the overarching policy relating to retail provision in the current defined town centres, Policy E10 establishes Primary Shopping Frontages (within which permission will not normally be granted for the change of use of ground floor premises from retail to non-retail uses unless it can be demonstrated that this would not be harmful to the existing character or primary shopping function of the area) and Policy E11 requires a sequential approach to be taken to ensure that town centres remain the preferred location for new retail development. Other policies address smaller, neighbourhood centre shops, rural retail and loss of village shops and services.
- 3.7 Policy in the adopted Local Plan aims to ensure that changes of use within the shopping frontages of town centres take place without undermining their retail function. The policy recognises that space in shopping frontages can usefully be taken up by non-retail uses. Such uses can add to the variety, attractiveness and economic activity of the centre, but only so long as they do not concentrate within the primary shopping area so that the retail character of the immediate area is not undermined and does not deter the movement of shoppers in a particular direction within the centre.

Issues and Options Consultation Spring 2021

- 3.8 To inform the new Local Plan, an Issues and Options consultation was undertaken in January 2021. The Council explored through consultation • How we might promote greater use of vacant upper storeys above ground floor shops. • Whether we should seek to resist out-of-town retail, or other commercial activities, in the hope that we may see more town centre shopping and investment. • Whilst it would probably be outside of the scope of local plan policy we could look to producing masterplans for town centres to identify key areas for improvement. • Any other comments on additional town centre policy objectives
- 3.9 The responses are listed at Appendix 1, but in summary, most respondents favoured mixed commercial uses in town centres, with over half of respondents supporting leisure or community uses and very little opposition to these. Dominant retail use (as has traditionally been promoted by policy) received around 30% support and a similar level of opposition. In the written comments the use of upper floors for services, community activities and housing were strongly supported and a range of measures suggested to encourage this. A significant proportion of respondents (around 20%) were opposed to change of use to housing, although this also received considerable (quantified) support.

In the written comments most concern related to the permanent loss of retail units to housing and the consequential impact on the retail function of the town centres. Edge-of-centre and first floor residential uses received considerable support. The need for town centres to be vibrant social spaces was expressed by many respondents. A range of activities, areas to sit and increased community, health and service uses were seen as a major draw.

- 3.10 In addition, respondents were invited to comment on additional town centre policy objectives. Three additional areas were suggested where policies may be appropriate, including the use of vacant stories over shops, resisting 'out of town' uses to support town centres and producing town centre masterplans to identify key areas for improvement, and respondents were encouraged to add their own views. Two thirds of respondents agreed with the suggested policy areas. A significant number of other suggestions related to management and financial matters that are not within the remit of the Local Plan.
- 3.11 Following this consultation, Members considered a report which set out the proposed policy approach to be taken in the emerging Local Plan along with reasonable alternative approaches. The draft Plan was informed by this debate. [Agenda item - Working draft of the proposed East Devon Local Plan 2020 - 2040 - East Devon](#)

Draft Local Plan Consultation Winter 2022

- 3.12 A draft Local Plan was consulted on from November 2022 to January 23. This included "Strategic Policy 56- Town Centre hierarchy, sequential approach and impact assessment" and "Policy 57- Town Centre development".
- 3.13 Policy 56 is a strategic policy because it establishes the network and hierarchy of centres. Maintaining the vitality and viability of the town centres in East Devon is a strategic priority in the plan. This policy is also the starting point for the suite of non-strategic policies on town centres and primary shopping frontages, local shops and services, and rural shops. This policy draws on the evidence in the Council's Role and Functions of Settlements Study produced by the Council in July 2021, which categorised the roles of existing settlements in the District by taking into account their differing sizes, offer, functions and accessibility by sustainable transport modes. The Role and Function of Settlement Study was reported to Strategic Planning Committee of the Council on 5 October 2021, see item 38 - 1a. [1a. Role and Function of Settlements_report_v3 final draft for SPC.pdf \(eastdevon.gov.uk\)](#) In addition to the town's identified in tier one and tier two, the smaller settlements of Budleigh Salterton, Beer and Colyton contain a similar range of shops and other uses typically found in the larger towns, albeit at a smaller scale, and so Policy 56 also applies to them.
- 3.14 Policy 57 takes a positive approach to the growth, management and adaptation of the town centres. As part of a positive strategy for the future of each town centre, the Local Plan defines their extent and makes clear the range of uses that are acceptable within them.
- 3.15 This consultation referred to the Town Centre area and Primary Shopping Area (which in most cases are one and the same due to the compact nature and concentration of retail uses) but did not show the boundaries on the Policies Map. The boundaries will be subject to a further consultation in Spring 2024.

- 3.16 It should be noted that the criteria-based policy relating to Primary Shopping Frontages (E10) in the adopted Local Plan was reviewed and considered to be out of date given the change of use now allowed by permitted development rights. The Council has taken on board the consultation responses received during the consultation which stressed the importance of keeping frontages up to date, the need for a policy approach that sought to retain a certain proportion of retail uses in the town centres and concerns that historic features will be lost during conversion and has addressed these matters through other policies.
- 3.17 The summary of feedback received in respect of the Draft Local Plan Policies 56 and 57 is attached at Appendix 2. Briefly, most respondents were neutral or broadly supportive of the policy approach and comments tended to focus on specific towns. There was concern that town centre retail uses could diminish, particularly if housing is encouraged, and that notable features (such as signage, doorsteps and shopfronts) should be retained. Various suggestions for town centre improvements were suggested. Several respondents were concerned about the potential impact of out of centre retail development and/or how it could be accessed sustainably but the lower, 500m, threshold for retail impact assessments was not challenged and neither was the default threshold, 2500m, for other types of development. Overall, no major wording changes were necessary as a result of the feedback.

Consultation Spring 2024

- 3.18 **To be completed after the consultation**

Evidence Base

- 3.19 The existing and emerging retail and town centre evidence base that will support the preparation of the East Devon Local Plan is depicted in Table 3. These studies were commissioned by the Greater Exeter Strategic Partnership (GESP) to assist in local plan preparation.

Table 3- Evidence Base documents (* links to be added when they are available on the EDDC website)

Evidence	Date	Comments
Town Centre Assessments	September 2022	These were undertaken in house. They form part of this report
Greater Exeter Town Centre and Retail Study- Part 2 Retail Needs Assessment and Retail Strategy (Avison Young) *	December 2019	Jointly commissioned with Mid Devon DC, Teignbridge DC, Exeter CC and Devon CC
Greater Exeter Town Centre and Retail Study- Part 1 (GVA) *	September 2017- published 2018	Jointly commissioned with Mid Devon DC, Teignbridge DC, Exeter CC and Devon CC
Sequential Test Impact Assessment Threshold Justification	December 2023	This was undertaken in house. It forms Appendix 4 to this report

Sequential Test

- 3.20 In accordance with paragraph 87 of the NPPF, the Council must apply a sequential test to planning applications for new retail and retail related development, for example drive-through restaurants or retail warehouses. The sequential approach will be applied so that main town centre uses are located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) will out of centre sites be considered provided that they can be made accessible by a choice of means of transport and will not adversely impact upon nearby centres.
- 3.21 It is recognised that existing out of town stores will continue to provide a form of retailing which both adds to local shopping choice and is popular with the public. Proposals for the refurbishment and redevelopment with small scale extensions of out of centre stores may be acceptable where there is insufficient net gain in retail floorspace to have an adverse effect on other established centres. Sequential testing is not required for small scale rural development (including office development).
- 3.22 The NPPF sets a default threshold of 2500m² for requiring an impact assessment unless a proportionate, locally set floorspace threshold is adopted. Above this threshold planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan should be assessed for their impact. The scope of the Sequential Test and Impact Assessment required to be submitted in support of a planning application should be discussed and agreed between the applicant and the Council at an early stage in the pre-application process. It should include assessment of:
- (a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
 - (b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).
- Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on these considerations it be refused.
- 3.23 The level of detail included within the assessments must be proportionate to the scale and type of retail floorspace proposed and shall be determined on a case by case basis. In determining the scale at which impact assessments are required the Council have established a threshold figure of 500 square metres above which assessment will be needed (see Appendix 3 for justification). The default threshold of 2500 square metres will apply to other types of development.

4 Town Centre and Primary Shopping Area Assessments

- 4.1 In September 2022, the Council undertook a town centre and retail survey. This was an observational survey that recorded the Use Classes within, and adjacent to, the settlements identified in Policy 57 (Town Centre Development) of the Draft Local Plan.

Town	Tier
Exmouth	One- Principal Centre
Axminster	Two- Main Centre
Cranbrook	Two- Main Centre
Honiton	Two- Main Centre
Ottery St Mary	Two- Main centre
Seaton	Two- Main Centre
Sidmouth	Two- Main centre
Budleigh Salterton	Three- Local Centre
Colyton	Three- Local Centre
Beer	Four- Service Village

- 4.2 In accordance with the methodology at Appendix 3 a visual survey was carried out on all the ground floor units within the town centre area (as defined in the adopted Local Plan) and any business units just outside these boundaries. We also visually surveyed any residential property in line with the NPPF which recognises the importance of residential space within town centre and retail areas. In addition, the locations of train stations, car parks and bus stops have been identified, as these can contribute to the vitality and sustainability of the town centre and retail areas.
- 4.3 The previous Town Centre Survey was undertaken in 2012 by the Council. The range of uses has been expanded in the most recent survey. The importance of residential units and leisure use to the high street is highlighted in the NPPF, so these (and allied) uses are now recorded. As a result of this, direct comparisons between the 2012 and 2022 surveys cannot be made. Although the range of uses has been widened it was necessary to group some uses (such as community uses) together where they may draw visitors to use the town centre in a way that generates vitality even if users are not spending money. Libraries and Dr surgeries are examples that will not generate spending in themselves but will add to town centre vitality and viability. Visiting a library or surgery will often form part of linked trips with visiting shops and other town centre attractions/facilities.

March 2012 survey:

- A1 – shops with charity shops forming a sub-category (this included uses such as hairdressers and opticians);
- A2 – Professional and financial services;
- A3 – Restaurants and cafes;
- A4 – Pubs;
- A5 – Takeaways
- Vacant units; and
- Other .

September 2022 survey:

- Shops with charity shops forming a sub-category
- Service uses such as hairdressers, opticians, nail bars and other ‘experiences’
- Professional and financial services
- Restaurants and cafes
- Pubs

- Takeaways
 - Residential
 - Leisure
 - Community/health/day nurseries
 - Vacant units; and
 - Other
- 4.4 The draft East Devon Local Plan of 2024 includes two site specific retail policies:
- **56. Strategic Policy – Town centre hierarchy, sequential approach and impact assessment** and
 - **57. Strategic Policy - Town Centre development**
- Which relate to defined Town Centre Areas and Primary Shopping Areas
- 4.5 The first of these policies establishes the principle for accommodating retail and commercial development in town centre areas and the second specifically seeks to encourage uses that would improve the quality and/or broaden the range of retail and leisure facilities, enhance the role of the town centres as sustainable shopping and leisure destinations and strengthen their vitality and viability whilst resisting proposals which would undermine the shopping character or visual amenity of the town centre. The policies refer to defined areas but at the time of the draft consultation (winter 2022) the relevant areas to which policy was proposed to apply were not defined in the plan document and so these are subject to consultation in 2024. This paper is concerned with policy boundaries. For the actual proposed wording of policy the draft Local Plan should be referred to, see: [Have Your Say Today - 09 Supporting jobs, the economy and vibrant town centres - East Devon Local Plan \(commonplace.is\)](#). It should be noted that policy wording may be refined in readiness for plan submission. Any policy wording refinement will be undertaken outside of this paper.
- 4.6 Defining policy and areas to promote retail activity and protect town centre areas is critical because in the absence of such policies investment in commercial activity could be dispersed widely inside and outside towns. Dispersed patterns of investment/activity could undermine the key functional importance of town centres and their relationships with the surrounding area, such as being nodal points for public transport systems, acting as a draw for tourism and providing for linked trips to multiple outlets. Many land uses can be more valuable to property owners than retail use. There can, therefore, be pressure to convert retail and other commercial buildings to another non-commercial use. Whilst this may be financially beneficial for a property owner it can erode and undermine the commercial vitality and viability of town centre areas and as a consequence have very much more significant and wider adverse economic and social impacts. For this reason it is essential that the role of town centres as sustainable shopping and leisure destinations is strengthened and protected.
- 4.7 **Town Centre Areas**
- The policy approach advocated is one of defining Town Centre Areas to encompass broad central areas in towns where there is existing retail and commercial activity and potential to accommodate more activity. Town Centres provide a wide range of services and fulfil a variety of functions that need to be accessible to a large number of people from all sectors of the community. In addition to retail shops, East Devon town centres provide business opportunities, health services, housing, educational opportunities, public transport, leisure and entertainment facilities, tourist attractions and a diversity of other uses which contribute to vitality and viability. Different, but complementary uses, during the day and in the evening, can reinforce each other making town centres more attractive to local residents, shoppers and visitors. Uses such as leisure and entertainment facilities, museums and libraries, hotels, street markets, restaurants, pubs and cafes all add variety. Occupation of flats above shops and in vacant units can increase activity, and therefore personal safety, and ensure that buildings are kept in good repair.

- 4.8 The approach is one of town centres being of a size that ensures that they are large enough to provide flexibility and scope for more activity but without being so large that they could lead to dispersal of commercial activity into separate unconnected pockets or zones. Ease of physical movement and connectivity is seen as critical, therefore defined shopping areas cover areas that are comfortable to walk around and across for reasonably active people.
- 4.9 Primary Shopping Areas are the areas within the town centre where most retail activity is concentrated. Ensuring that a range of shops and leisure uses are available and are in close proximity will enable visitors to make linked trips. Other uses, including residential, that would undermine the shopping and leisure function of the Primary Shopping Areas will be resisted as non-active use and 'blank' frontages will lessen the offer and appeal to visitors. In most cases the town centres are relatively compact and are focussed around the concentration of retail/leisure uses. In these cases, the Town Centre Areas and Primary Shopping Areas will be the same and the boundaries will be concurrent. In the cases of Seaton and Exmouth the town centres extend further and uses are more dispersed- there are concentrations of leisure/retail which are identified as Primary Shopping Areas but other, intervening, town centre uses are excluded from these areas. The Town Centre and Primary Shopping Areas are not concurrent and are drawn separately in these towns.
- 4.9 The sections that follow show the results of the retail survey work for each town centre on one map and then, on a second map, the proposed policy boundaries. The maps are supported with brief associated commentary about each town.
- 4.10 It should be noted that it is the street frontage that was surveyed and that is the critical component of the survey work. For ease of mapping Ordnance Survey defined building plots/blocks have been coloured in. The colouring in of plots/blocks does not indicate that all of the coloured in area is in a given defined use or function nor that there are active frontages (eg shop windows) on all external sides of premises.
- 4.11 In addition to this survey work the Council also commissioned GVA Grimley/Avison Young to undertake two part town centre health check and retail study. This was completed in December 2019. The reports should be read in conjunction with this paper. See: [Need to update links to East Devon website \(the reports are still available at Sharepoint at the time of writing and the EDDC links are not yet available\)](#)
[Evidence - Greater Exeter Strategic Plan \(gesp.org.uk\)](#)
[Planning websites - Town Centre and Retail Study - Part 1.pdf - All Documents \(sharepoint.com\)](#)
[Planning websites - Retail Needs Assessment and Retail Strategy.pdf - All Documents \(sharepoint.com\)](#)

Evaluation of Boundaries at Axminster

Axminster is East Devon's most easterly town and the town centre forms a focal point supporting the town's population and a large rural catchment. Axminster is a long established town with a historic street pattern and many older impressive buildings. The town centre forms a north-south through route for vehicles with congestion being identified as an issue; whilst this does put pressure on road space it does ensure passing trade. The town is served by a number of car parks.

As a market town, the centre focuses on the market square and a very busy street market continues to be held on Thursdays.

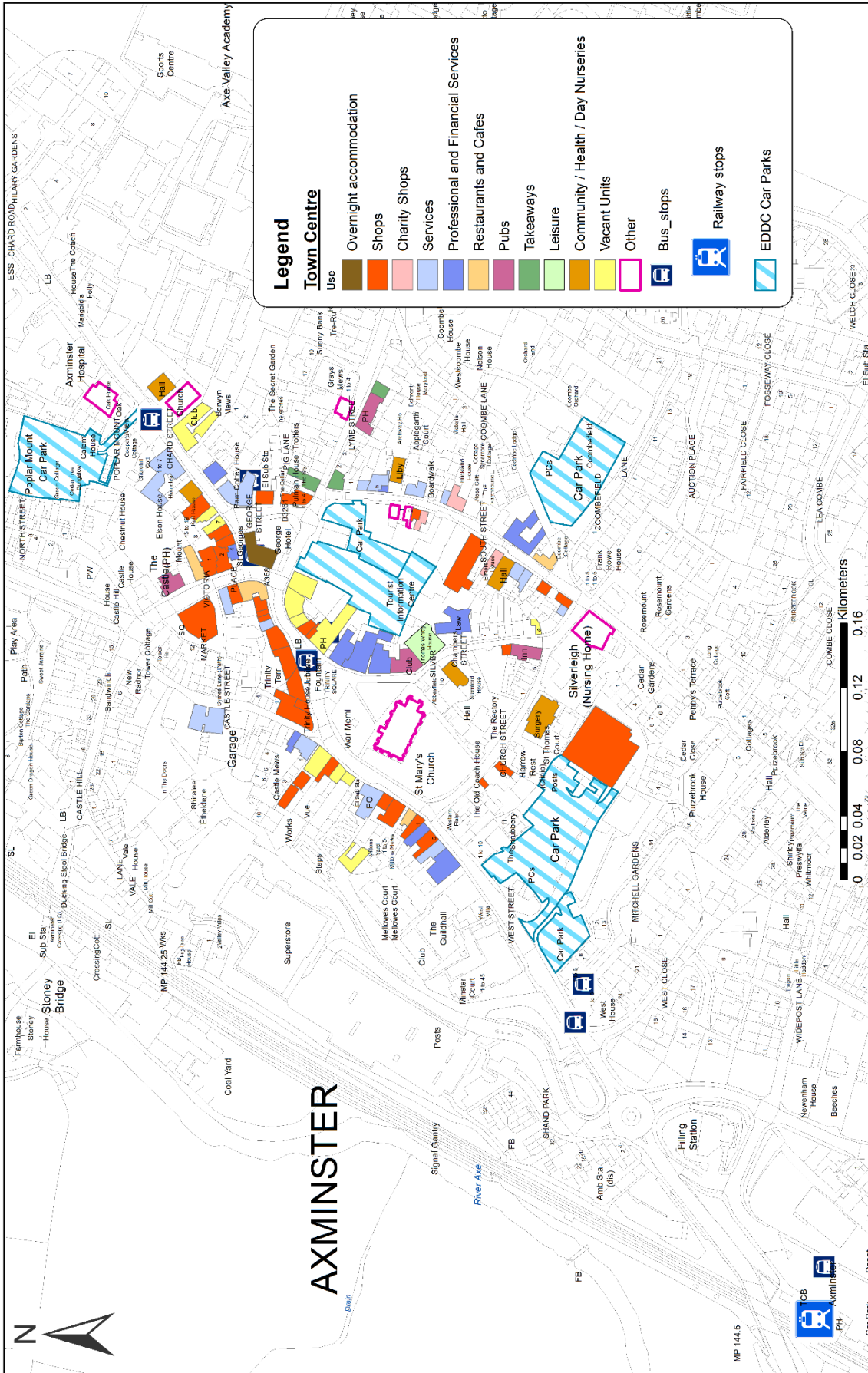
Axminster has a smaller population than most other East Devon towns and the shopping centre is proportionally smaller. Since the last survey the town has lost River Cottage Canteen, owned by a TV chef which was a major visitor draw. However, offsetting this loss, the very prominently located Trinity House has been renovated and now houses several independent shops at ground floor level and The Community Waffle House at first floor. The Community Waffle House is a thriving community business which hosts over 50 local organisations and holds regular classes, clubs and events in addition to serving food and drink.

There are a wide range of independent retailers in the town but only a limited number of national chain stores. There are several charity shops in the town (large numbers of charity shops are seen as an indicator of struggling centres) and also several vacant units. Webster's Garage, the most significant vacant floorspace identified in the previous survey (vacant and derelict building) has been demolished and is now a car park which also hosts the annual fairground. Opposite Webster's Garage the George Hotel has been fully refurbished since the last survey and is now a thriving public house again. Other vacant units are mostly amongst the smallest in the town and have mainly not been used for retail eg. Café, estate agency.

The former Webster's Garage site, along with possible future redevelopment of sites to the east in South Street (currently owned by the Royal Mail), offer the opportunity to provide additional shops and other ground-floor commercial uses such as cafe's which could greatly enhance the vitality of the town centre

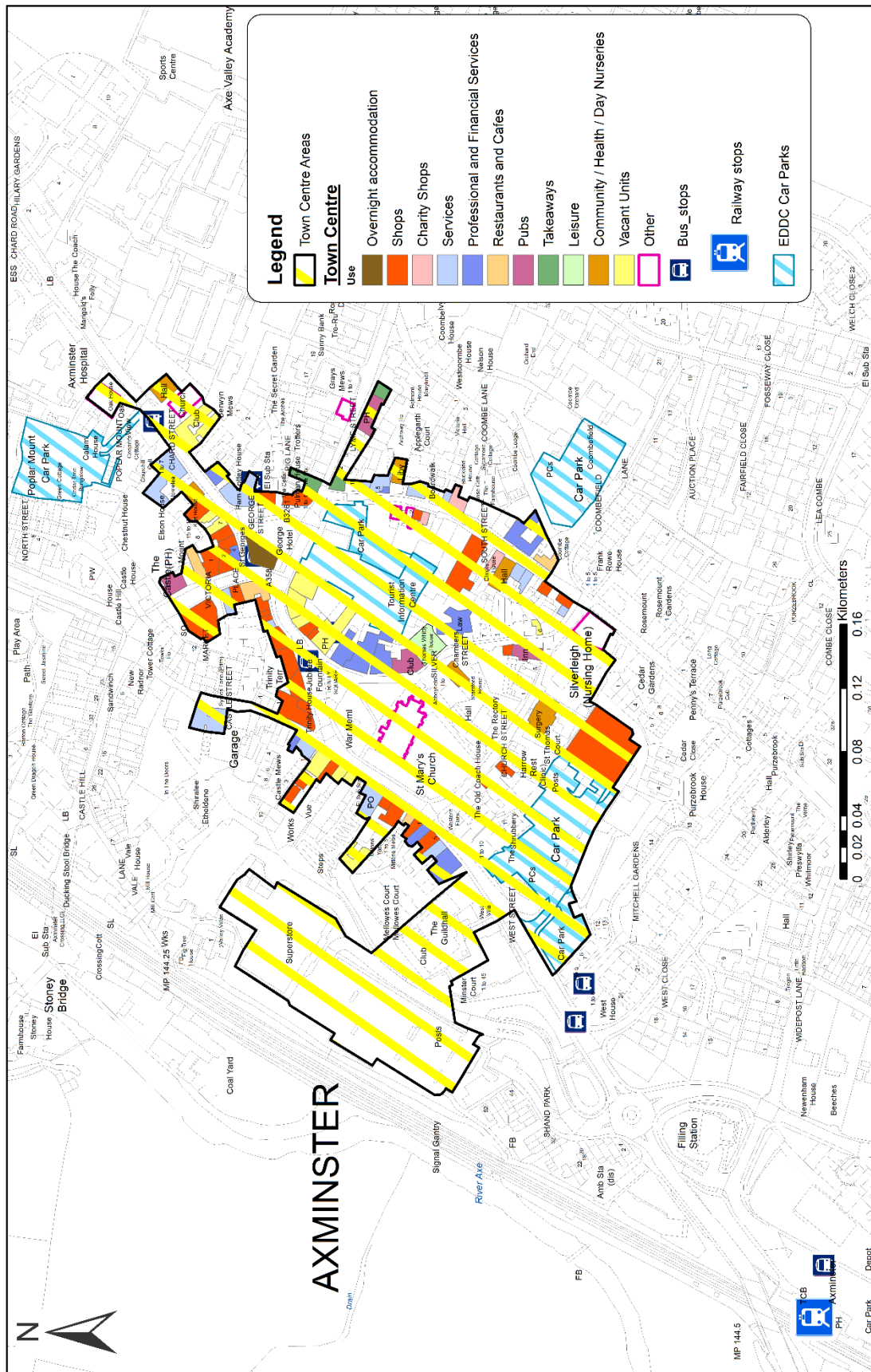
Supermarket provision in the town is dominated by the Tesco supermarket that lies to the west of the town centre and the Co-op supermarket to the south of the town centre.

The first Axminster plan (next page) shows the survey frontage results. On the basis of the survey the second and third Axminster maps show the proposed policy boundary areas for the town.

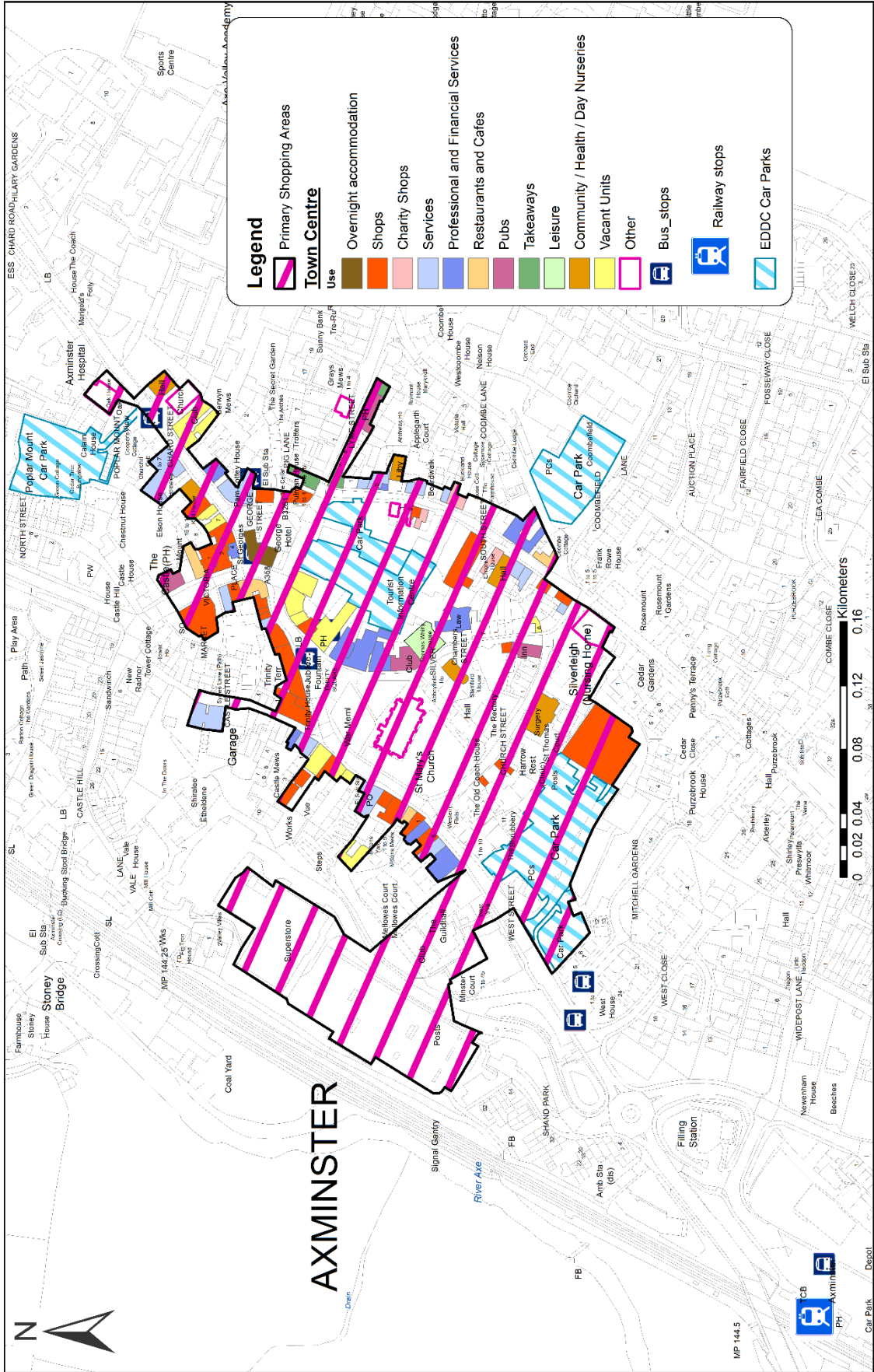


Town Centre Retail Survey
- Axminster -

Axminster Proposed Town Centre Area and Primary Shopping Area Maps



Town Centre Retail Survey - Axminster -



Town Centre Retail Survey - Axminster -

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Evaluation of Boundaries at Beer

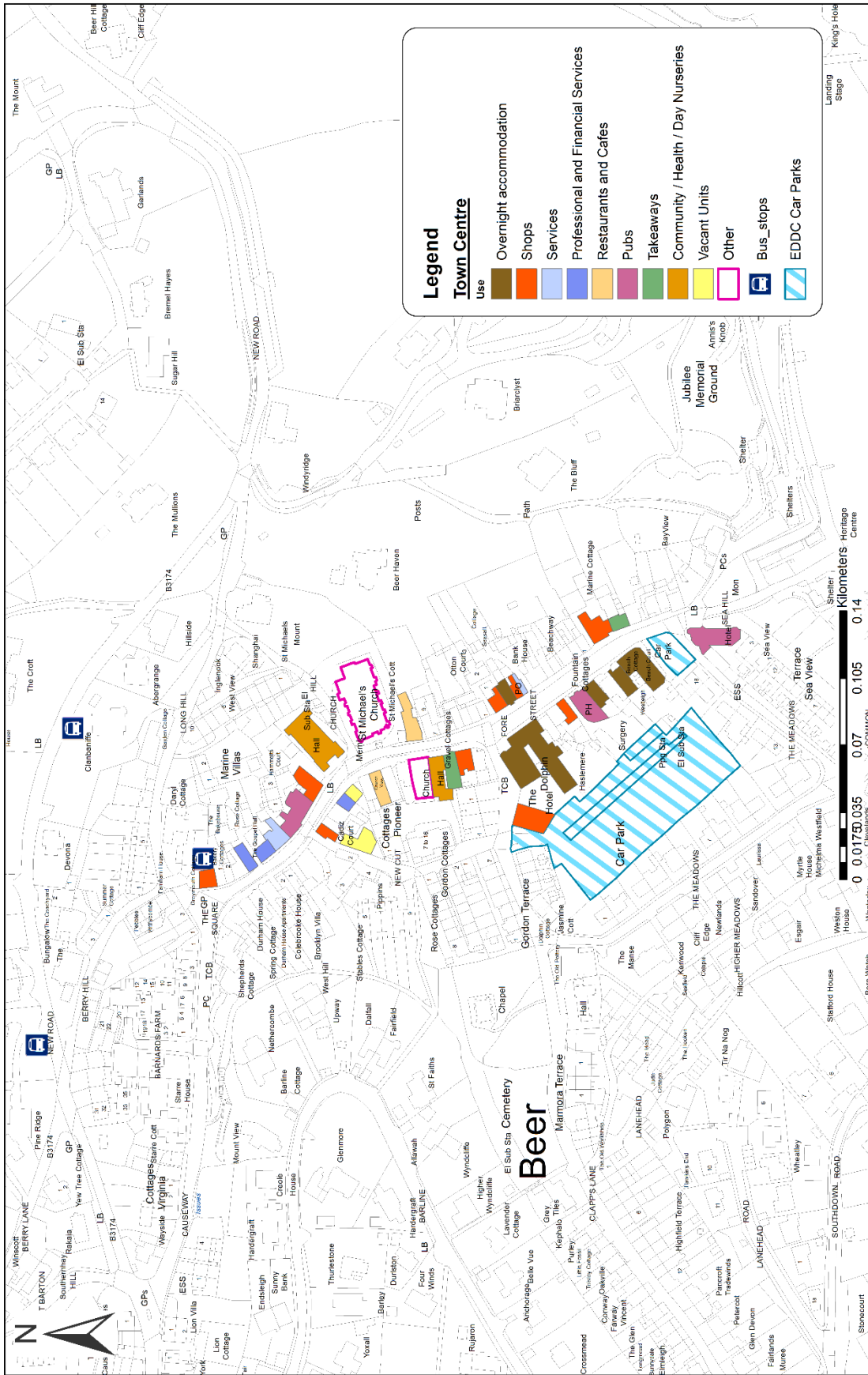
Beer is a medium sized, thriving seaside village famous for its fishing industry and very popular with tourists. It has an unusually large range of shops to meet visitor needs but also the resident population. It has a historic, dendritic (with fingers like an outstretched hand), street pattern and the High Street extends to the beach.

All of the shops and services are operated by independent retailers. Beer has a comparatively large number of café's and pubs, which will reflect demand from the resident population and also from the tourism trade. There has been some pressure to change the use of some shops to houses or holiday lets and this is a cause for concern due to the potential impact on visitor offer and the local community.

Beer does not have a supermarket or moderately sized food shop although some shops sell groceries in addition to other products. The nearest supermarkets are around 2km away in Seaton.

The first Beer plan shows the survey frontage results. On the basis of the survey the second and third Beer maps show the proposed policy boundary areas for the village.

Beer Retail Survey map

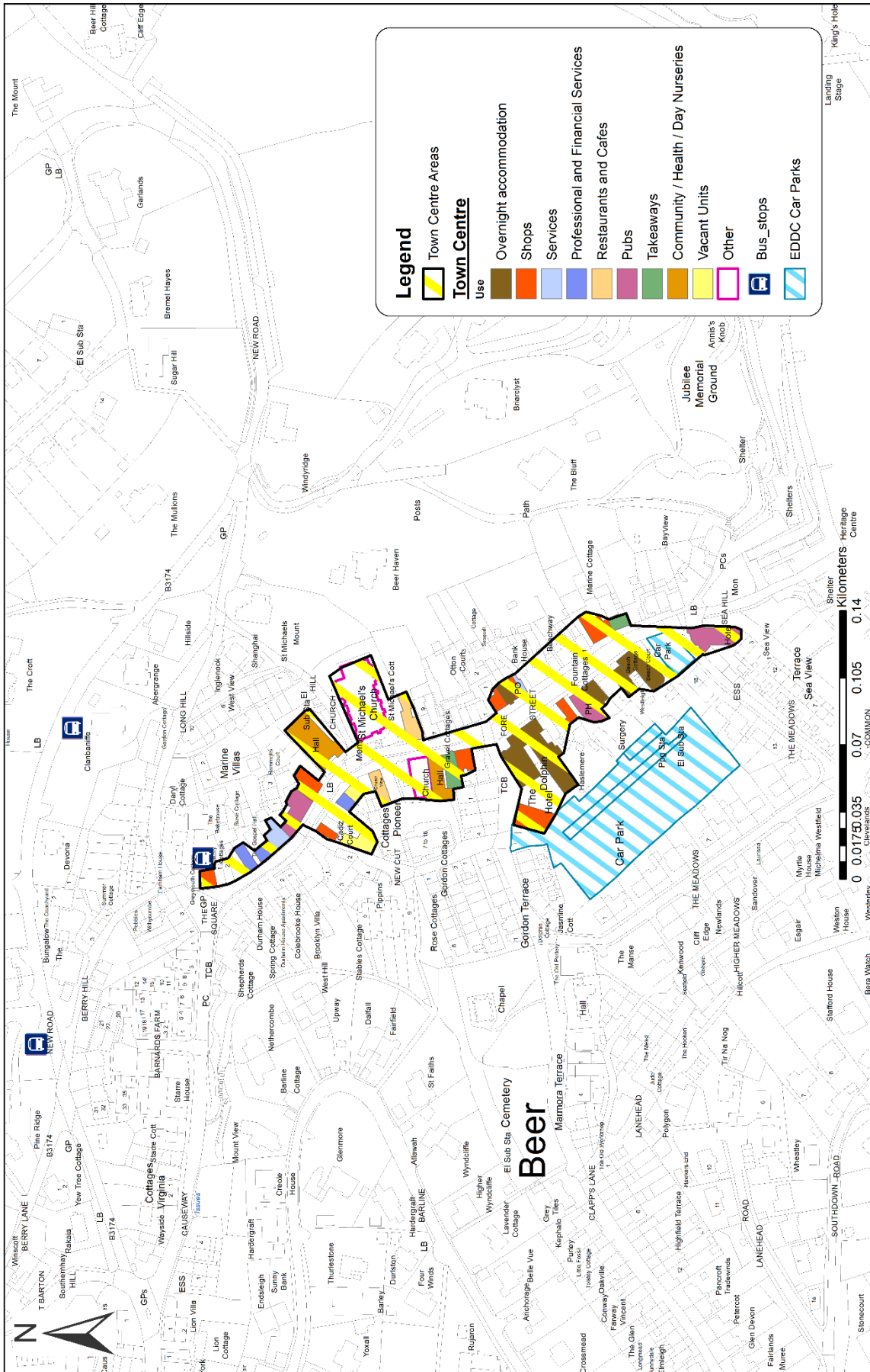


Town Centre Retail Survey

- Beer -

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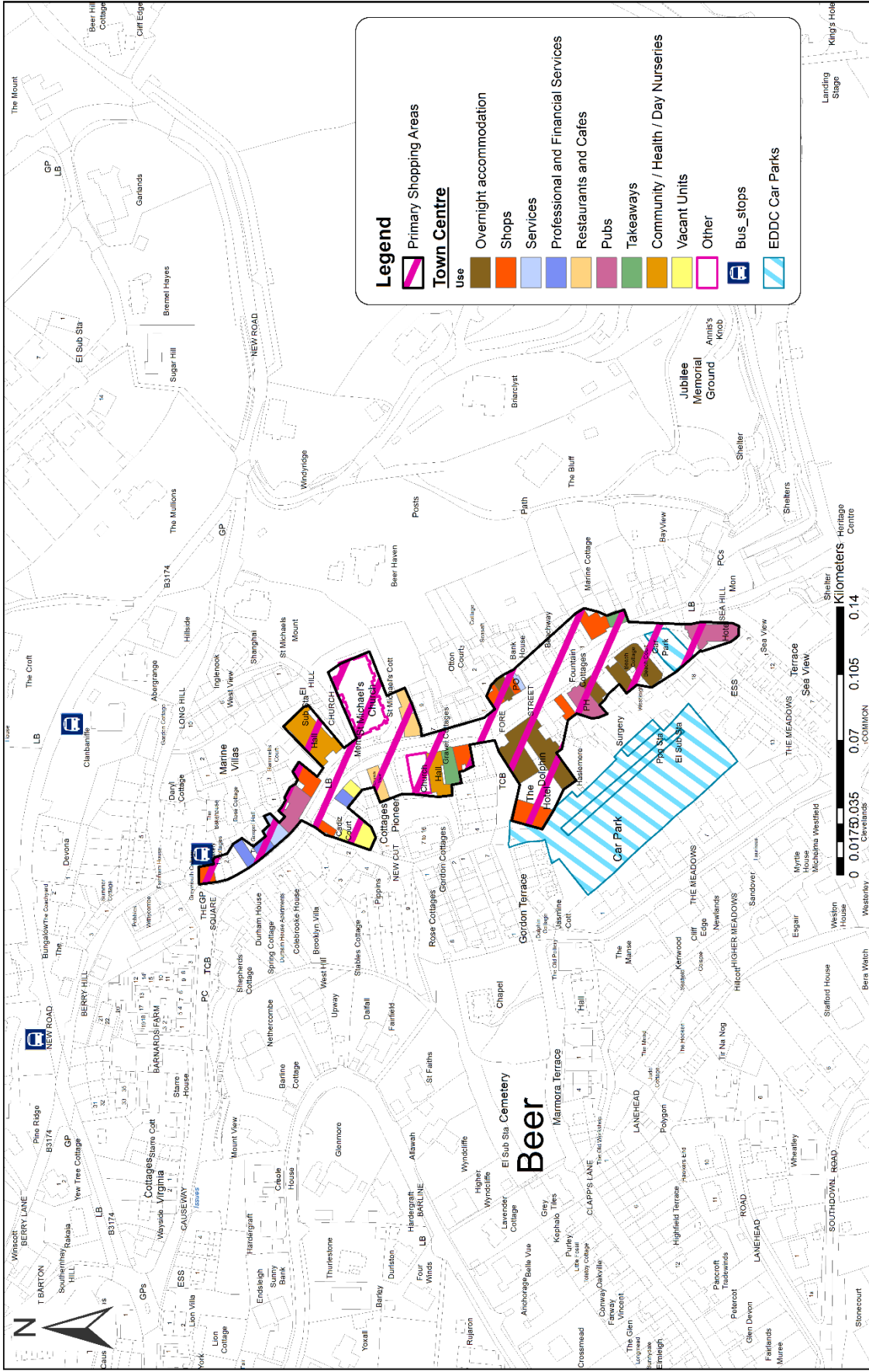
Beer Proposed Town Centre Area and Primary Shopping Area Maps



Town Centre Retail Survey

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Town Centre Retail Survey

- Beer -

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Evaluation of Boundaries at Budleigh Salterton

Budleigh Salterton is the smallest of the East Devon towns (if Colyton is classed as a large village) and correspondingly has the smallest town centre. The main shopping street is set back from and runs parallel with the seafront beach.

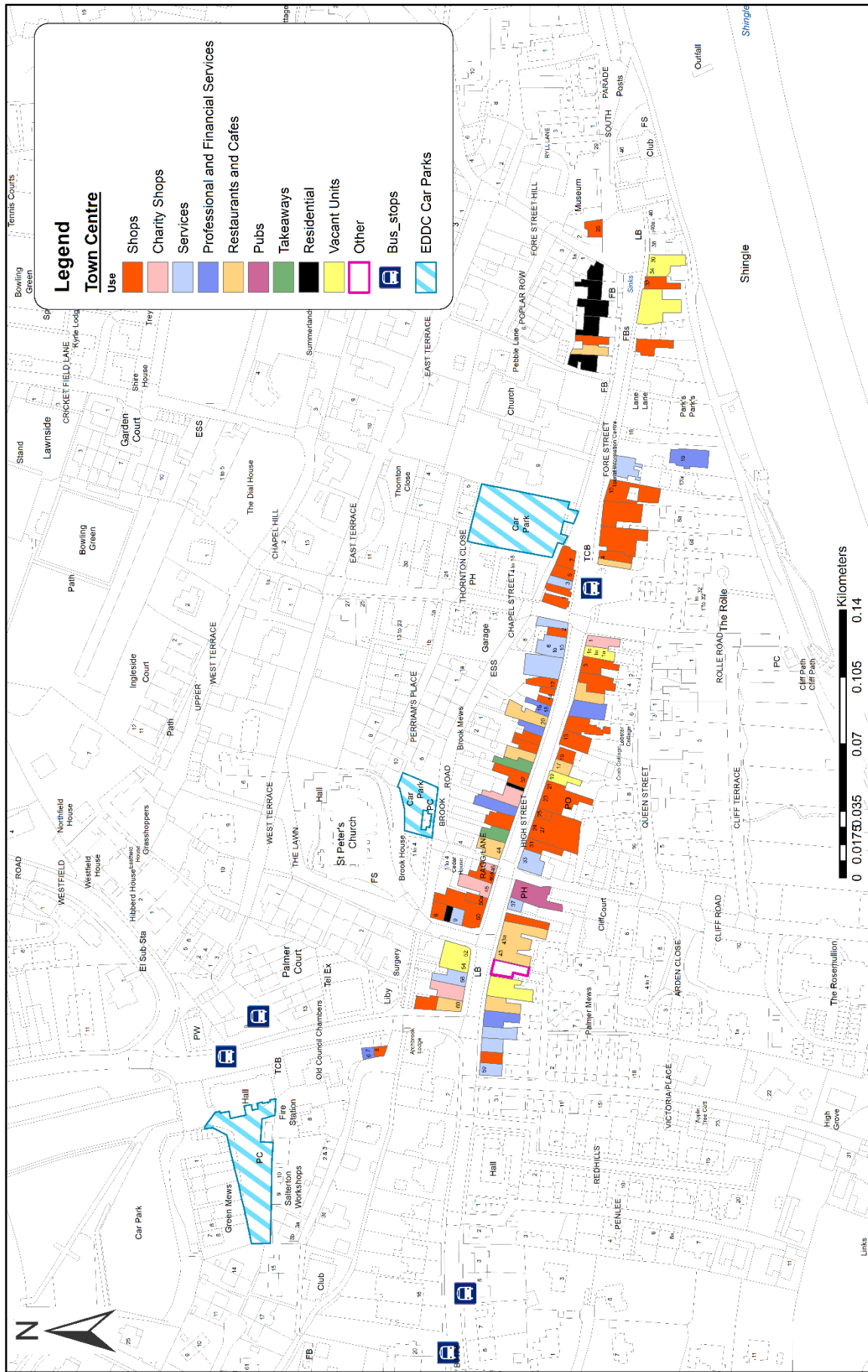
There are a wide range of independent retailers in the town but only a few national chain stores and, although there is a comparatively small number of shops, activity levels in the town are high. There are few vacant units, although the number of charity shops has increased slightly since the last survey, the town retains an air of commercial vitality.

Budleigh Salterton has a comparatively large number of café's, which will reflect demand from the resident population and also from the tourism trade.

Budleigh has moderately sized food stores but no supermarket. The nearest supermarket is located about 3 kilometres away on the Budleigh Salterton side of Exmouth. Exmouth itself offers a far more substantial range of shops than Budleigh Salterton and as such it serves residents of the town.

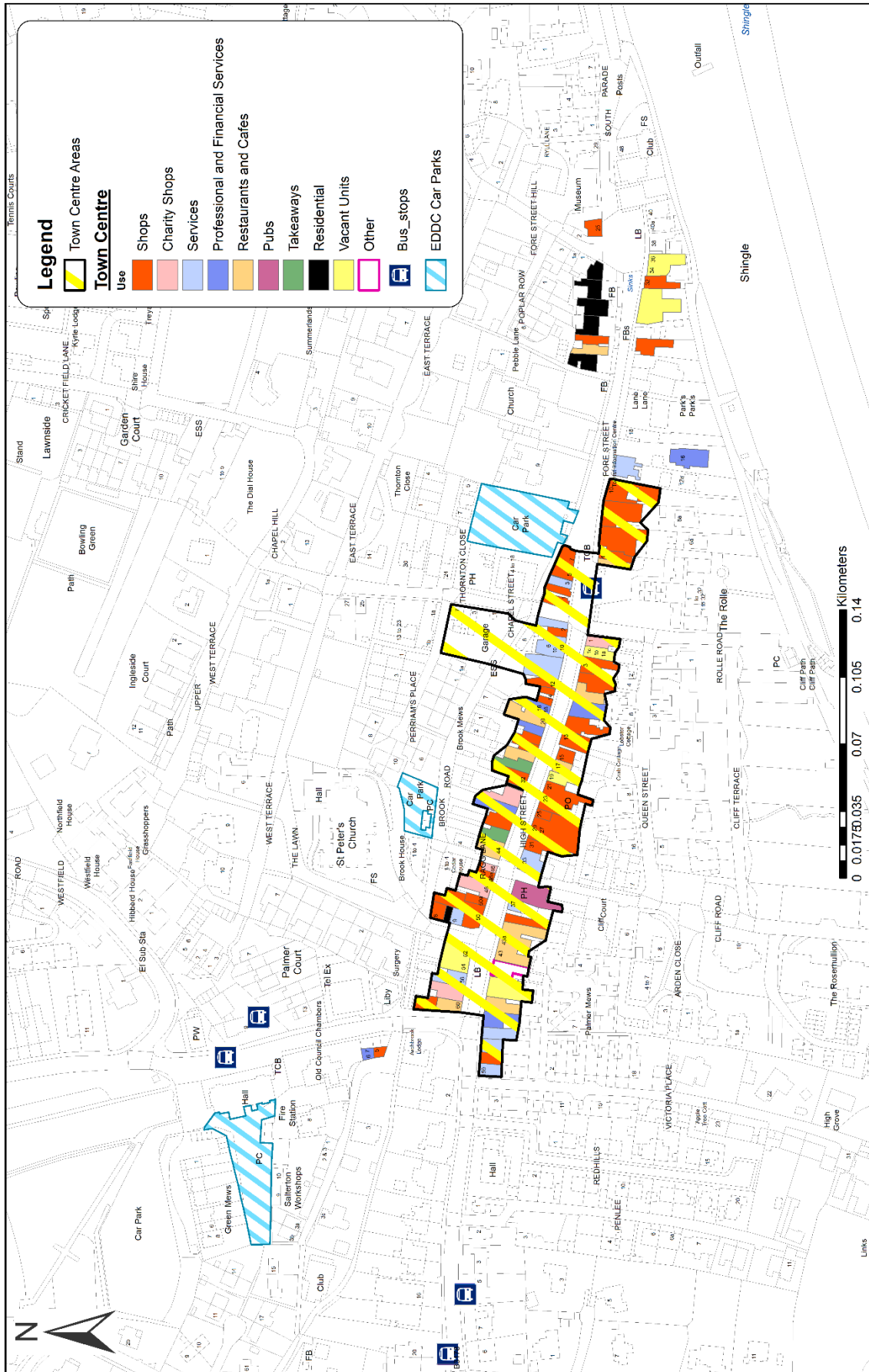
The first Budleigh Salterton plan shows the survey frontage results. On the basis of the survey the second and third maps show the proposed policy boundary areas for the town.

Budleigh Salterton Retail Survey Map



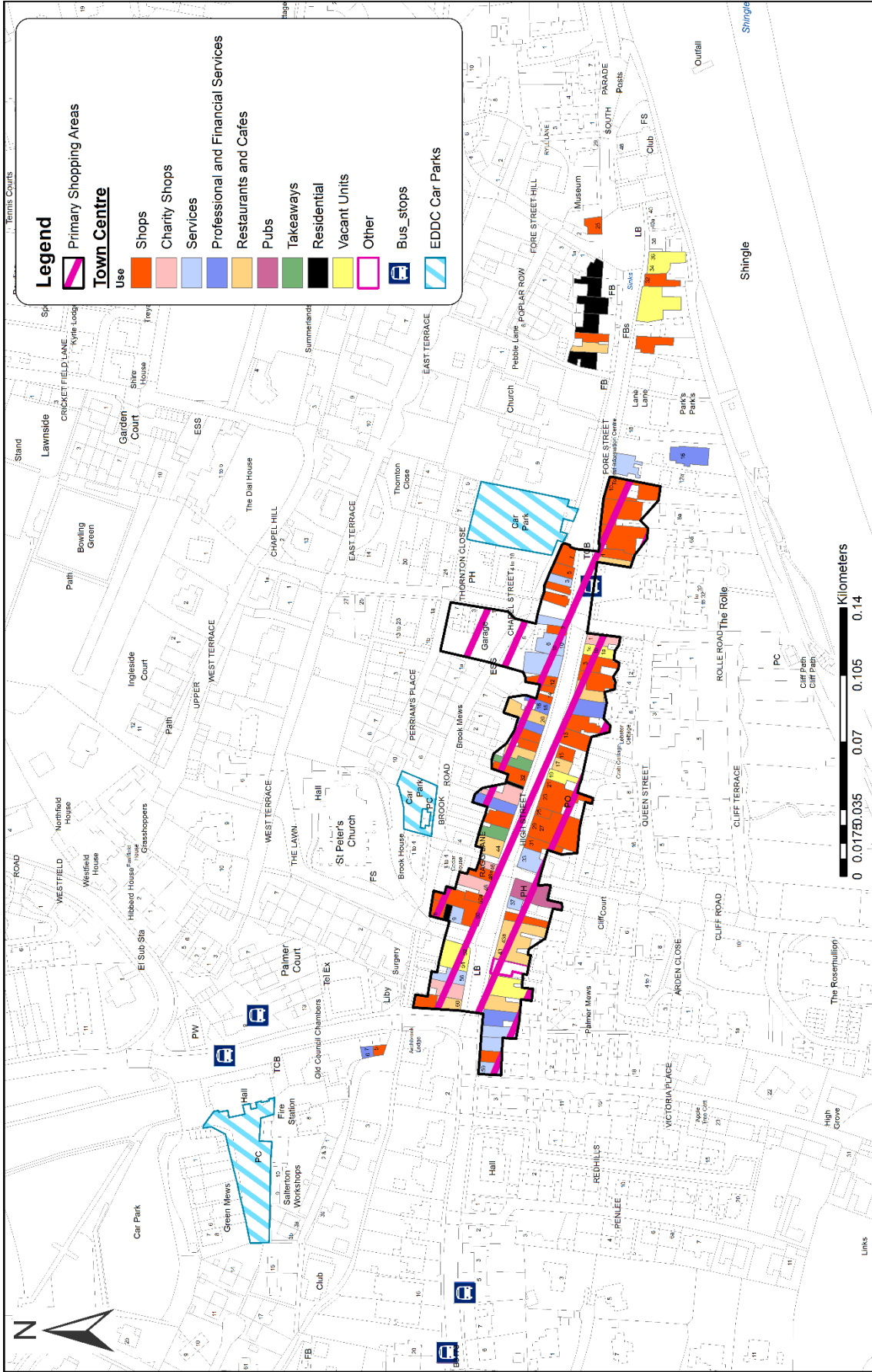
Town Centre Retail Survey - Budleigh Salterton -

Budleigh Salterton Proposed Town Centre Area and Primary Shopping Area Maps



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Town Centre Retail Survey - Budleigh Salterton -



Town Centre Retail Survey - Budleigh Salterton -

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Evaluation of Boundaries at Cranbrook

Cranbrook is East Devon's newest town and is also the town located closest to Exeter. Cranbrook has not been surveyed as the town centre is still under construction. In any case, a separate adopted Cranbrook Plan sets out the Policies which will apply in the town.

The town centre is in its infancy but it is intended that it will include retail units and apartments along the southern side of the High Street, a market square for social gathering and town events, a supermarket offering a full weekly shop and a childcare day nursery.

Outside the centre, the town already has a school, community centre with health facilities and a parade of shops, including a charity shop and small supermarket.

The population of Cranbrook is growing rapidly and, whilst it is one of the District's smaller towns at the moment it will ultimately be a medium-large town.

Evaluation of Boundaries at Colyton

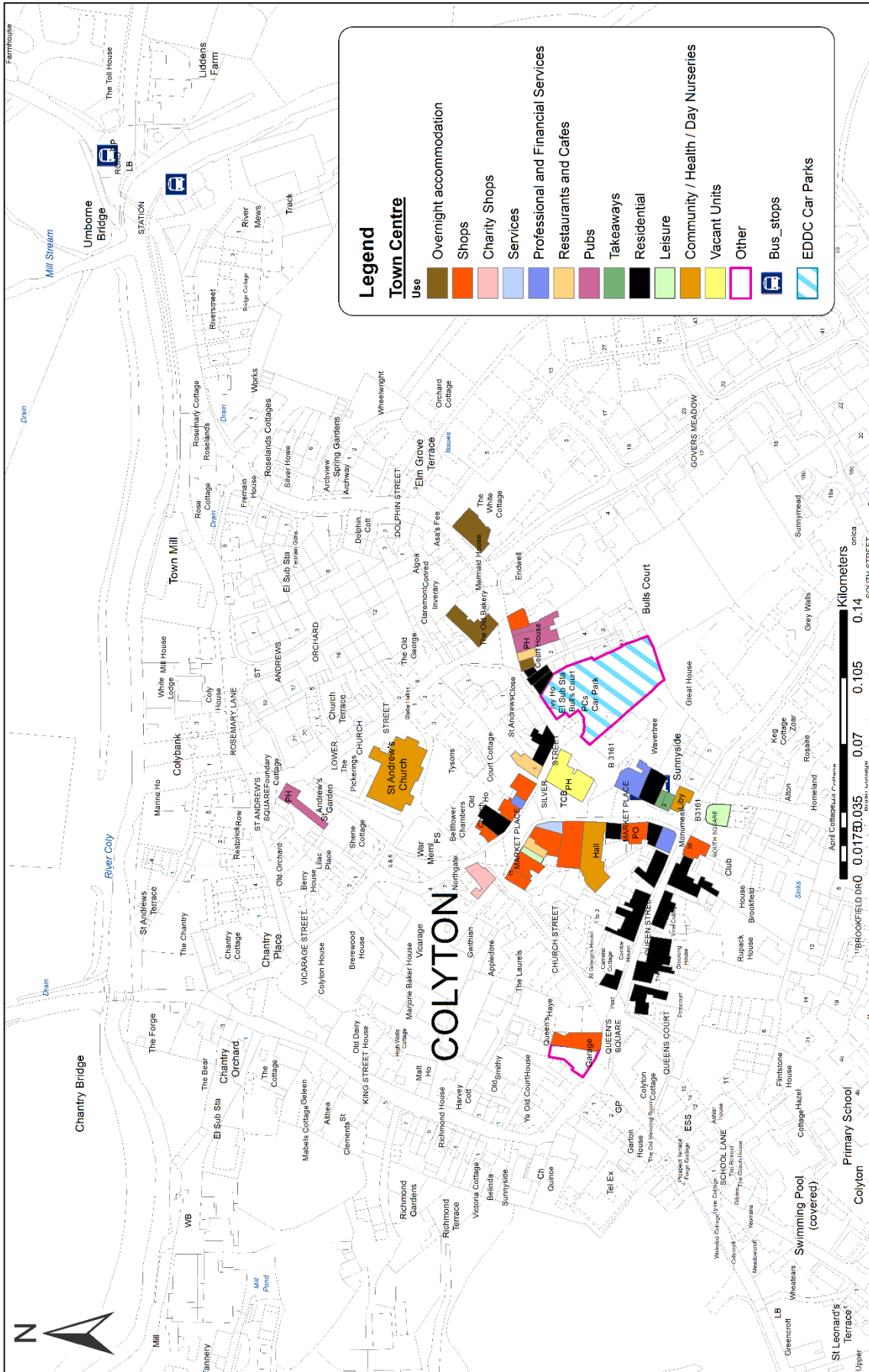
Colyton is the smallest town/largest village in East Devon and has a correspondingly small town centre. It is a long-established settlement with a medieval street pattern centring on a market place, which creates a 'hub' around which the majority of the retail offer lies. There are also a number of other shops and services in dispersed locations and smaller clusters in the surrounding streets.

Colyton's shopping centre is proportionate to the local population and does not serve a wide hinterland. It is served by one main car park, with free on-street parking around the market place.

Although the number of shops and businesses is relatively small, most are independent. Overall, all of the buildings are in a good state of repair and the centre appears to be thriving, with only one charity shop (also independent) and one vacant unit at the time of surveying.

The first Colyton plan shows the survey frontage results. On the basis of the survey the second and third Colyton maps show the proposed policy boundary areas for the town.

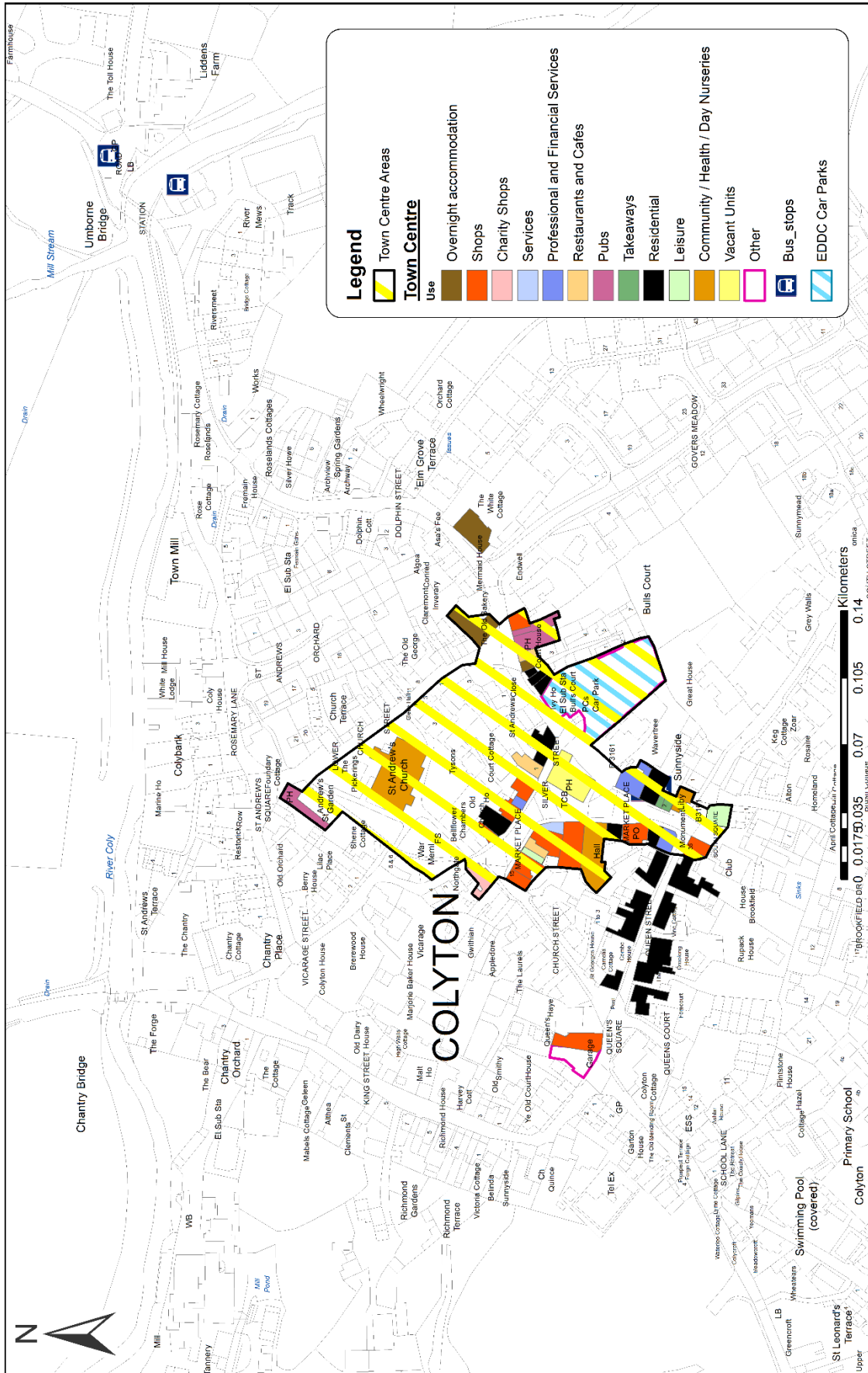
Colyton Retail survey map



**Town Centre Retail Survey
- Colyton -**

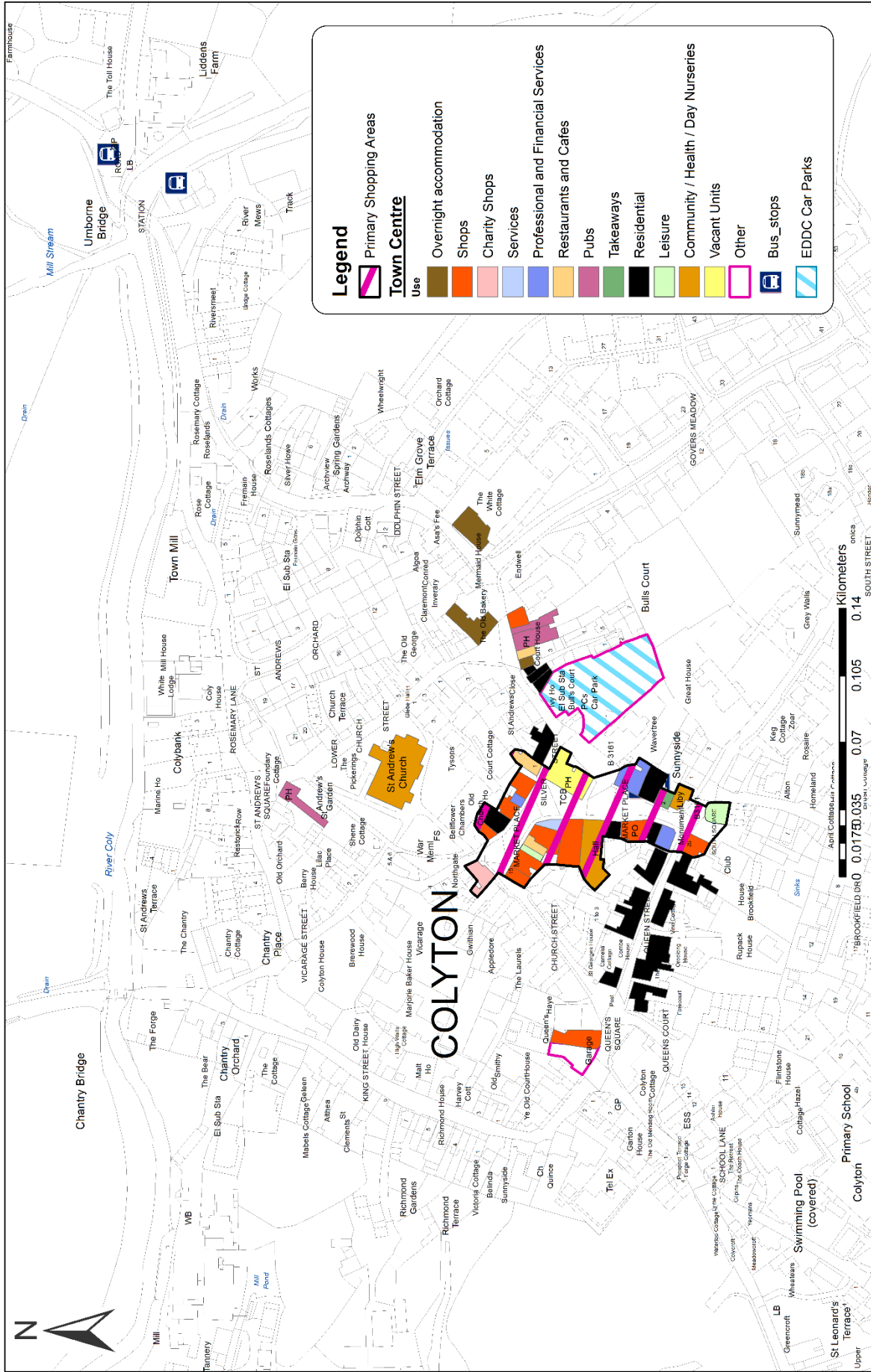
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Colyton Proposed Town Centre Area and Primary Shopping Area Maps



Town Centre Retail Survey

- Colyton -



Town Centre Retail Survey - Colyton -

Evaluation of Boundaries at Exmouth

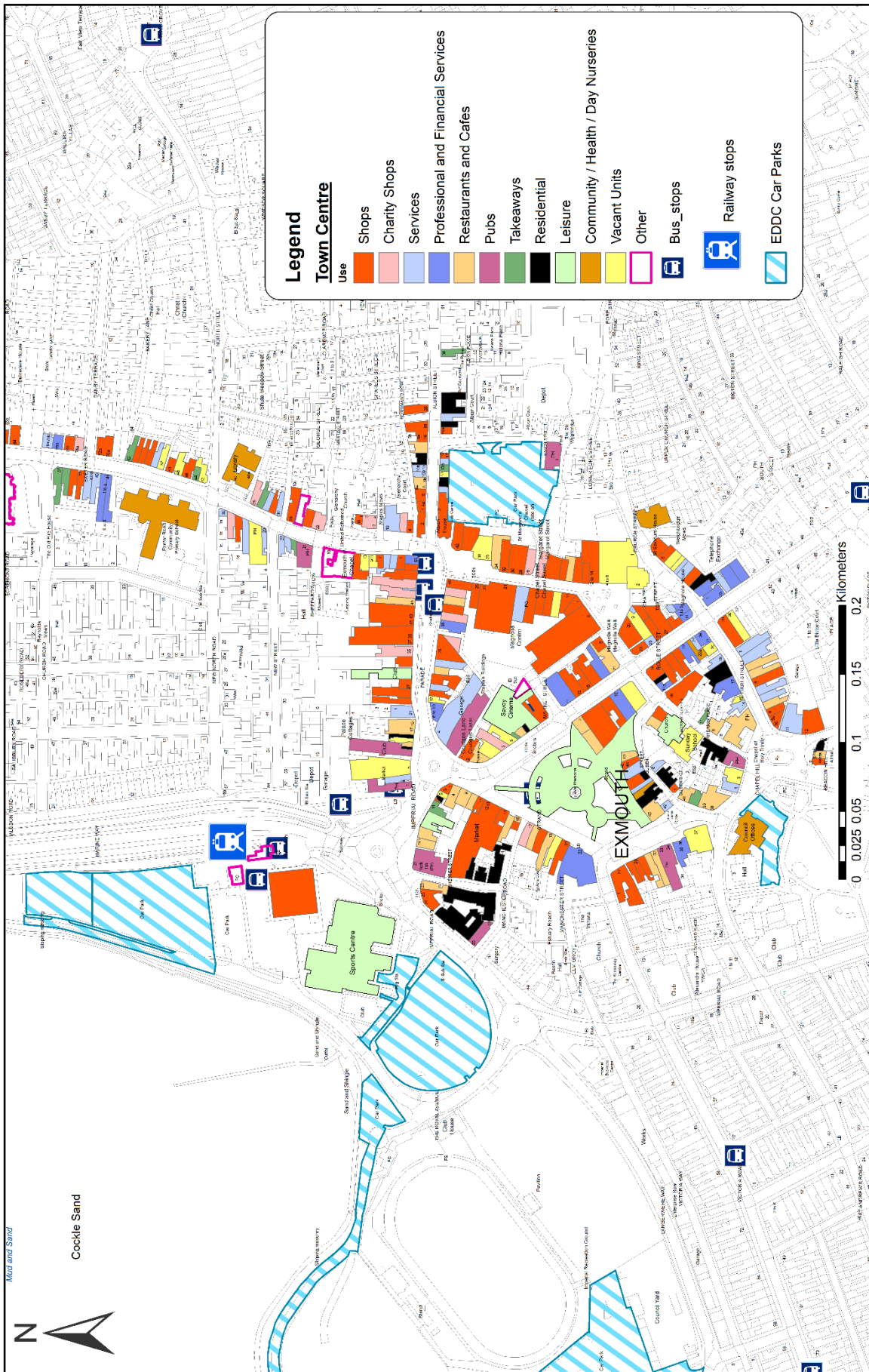
Exmouth is the largest town in East Devon and has the largest of the town centres.

The town centre is located in the south western part of the town with residential parts of Exmouth lying up to 4 kilometres away from it. No other East Devon town centre has residential areas that lie this far from the commercial core. There is a substantial pedestrianised hub to the town, a shopping centre dating back 30 years or so (the Magnolia Centre) and a number of shopping/commercial streets. The Council owned 'Strand' is a focus for cafes and community activity and regular markets and events are held here.

There are a wide range of independent retailers in Exmouth as well as a strong presence of national chain stores, although all at smaller store format. The quality and vibrancy of the town centre varies with some parts very active and others clearly far more peripheral and struggling. There are a number of vacant units and charity shops and a high presence of cafes and take away establishments. The latter, and a number of other shops, benefit from and are tailored at serving the holiday trade.

The town centre has a medium sized supermarket, Marks and Spencer, to the south west and this has been built since the last survey. The largest supermarket serving the town, a Tesco, lies around 3 kilometres to the east of the town centre. Also on this eastern edge of the town are a number of shops and trade outlets in a business/retail park (the largest being The Range) and, close by, a Lidl store.

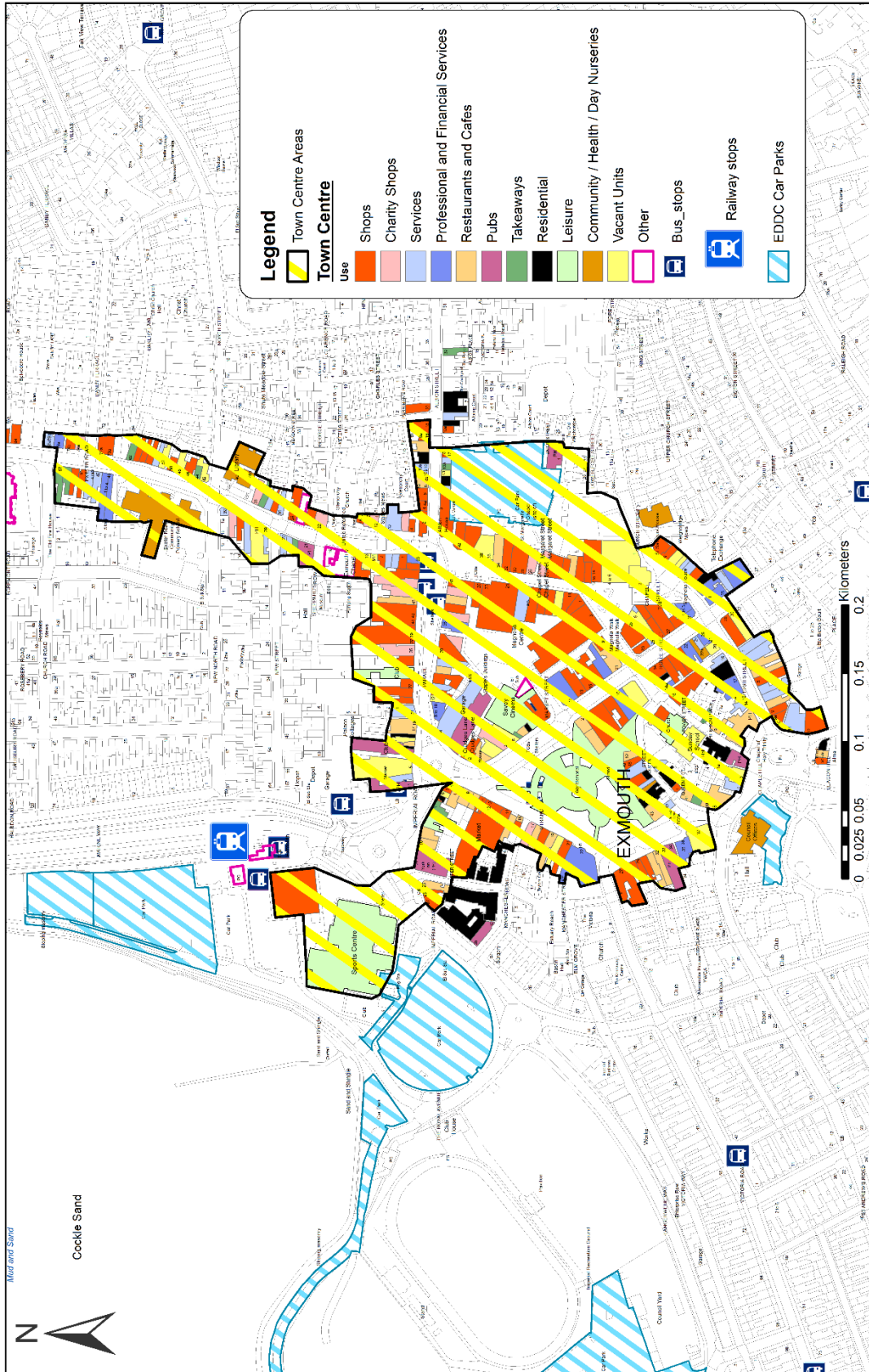
The first Exmouth plan shows the survey frontage results. On the basis of the survey the second and third Exmouth maps show the proposed policy boundary areas for the town.



Town Centre Retail Survey - Exmouth -

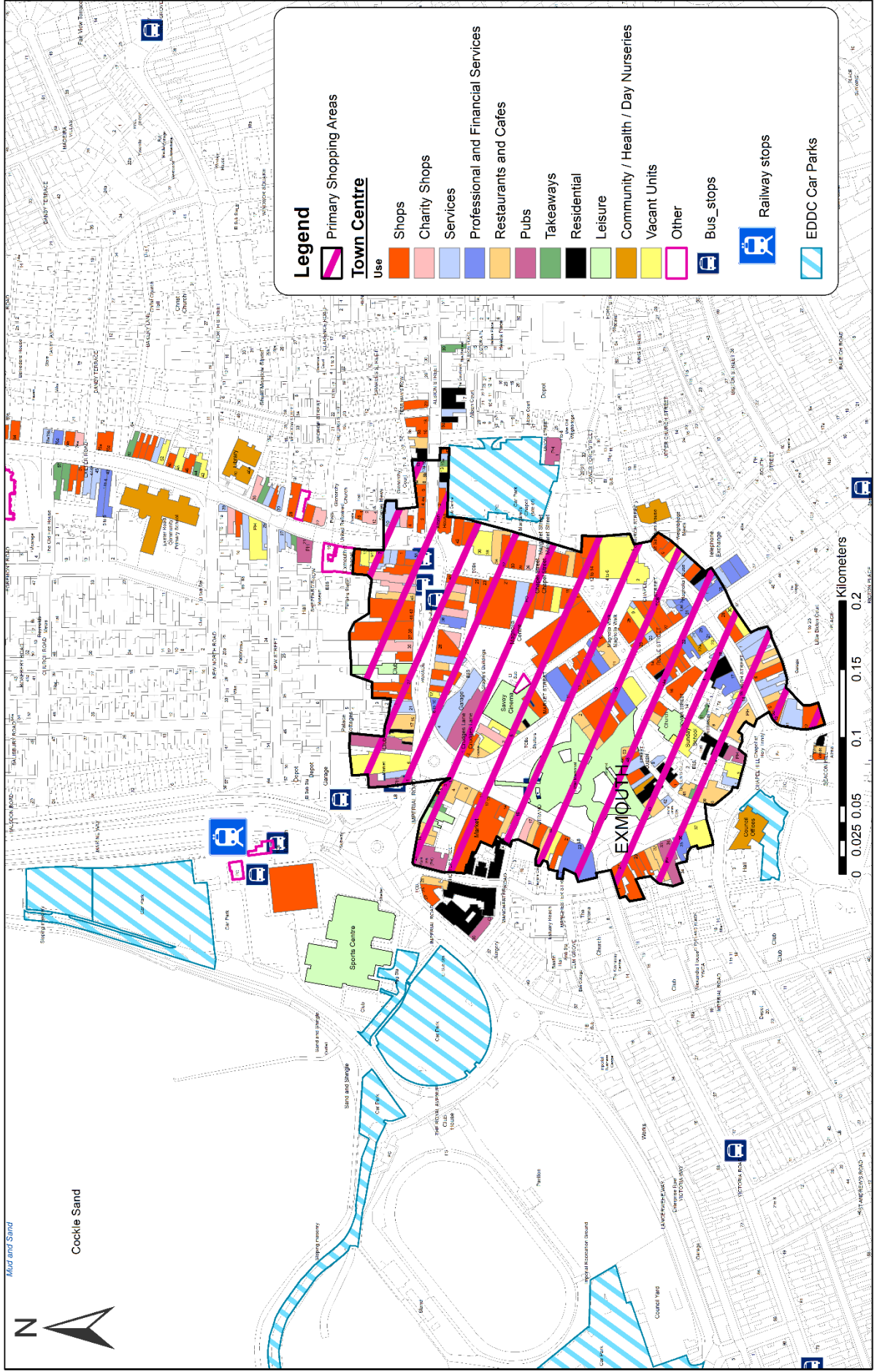
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Exmouth Proposed Town Centre Area and Primary Shopping Area Maps



Town Centre Retail Survey - Exmouth -

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Town Centre Retail Survey - Exmouth -

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Evaluation of Boundaries at Honiton

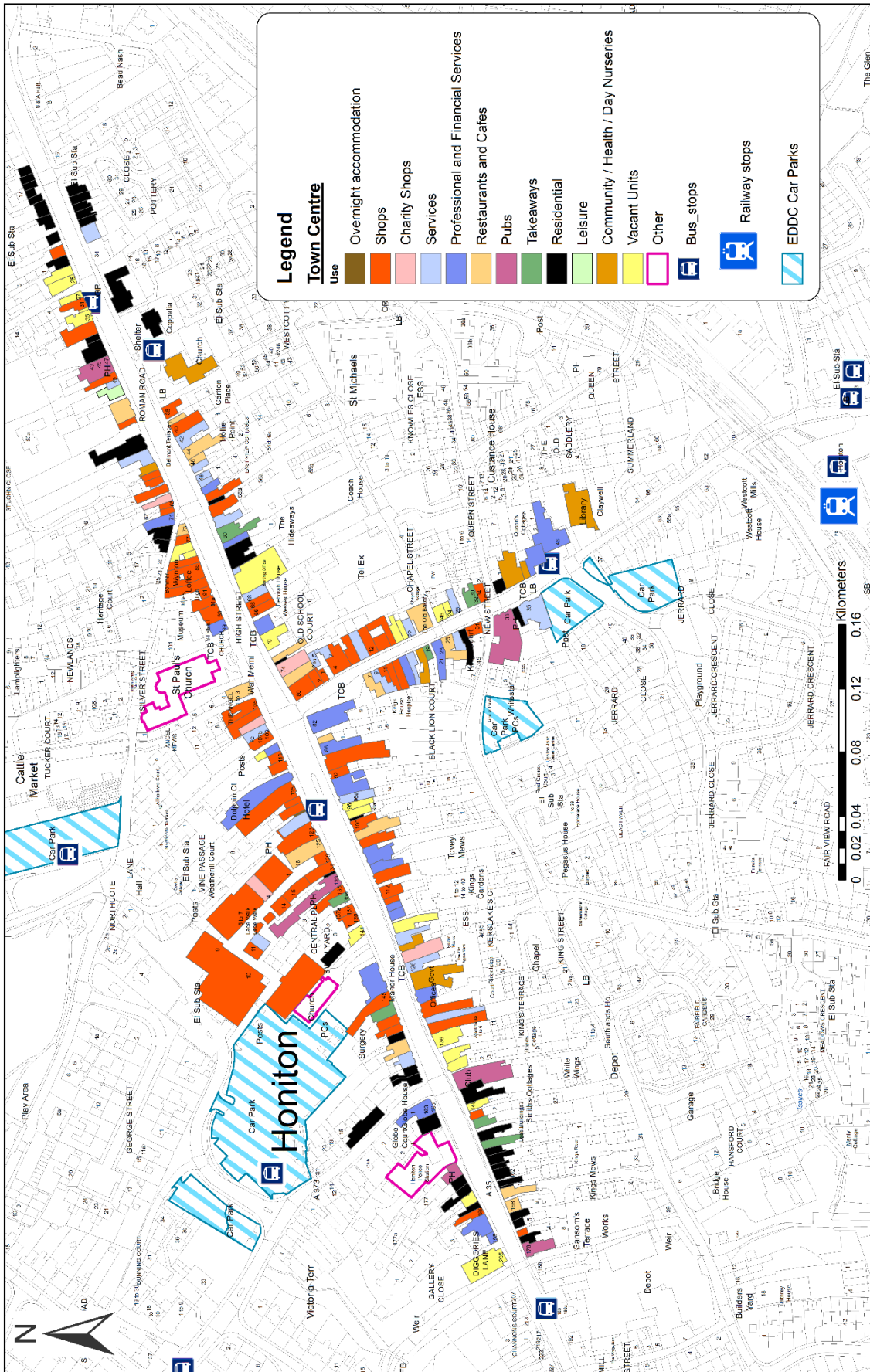
Honiton is centrally located in East Devon. The commercial core of the town is dominated by the north-east / south-west aligned High Street (former Roman road) that bisects Honiton. The town centre is second only in size in East Devon rankings to Exmouth and it has become a renowned centre for antique traders and is historically rooted in the lace trade. Twice weekly street markets have been held since medieval times and the very wide High Street makes it possible for stalls to set up along both sides of the road for around 150m. Since the last survey, the cattlemarket (to the north and behind the High Street) has closed and is being redeveloped.

Most of the shops and commercial premises front on to the wide boulevard style High Street with a main shopping street south, towards the train station, from the middle of this street. There are several much smaller shopping streets running north/south from the High Street.

There are a wide range of independent retailers in the town (many specialising in antiques) as well as several national chain stores. There are a number of vacant units and charity shops in the town and a high presence of other businesses.

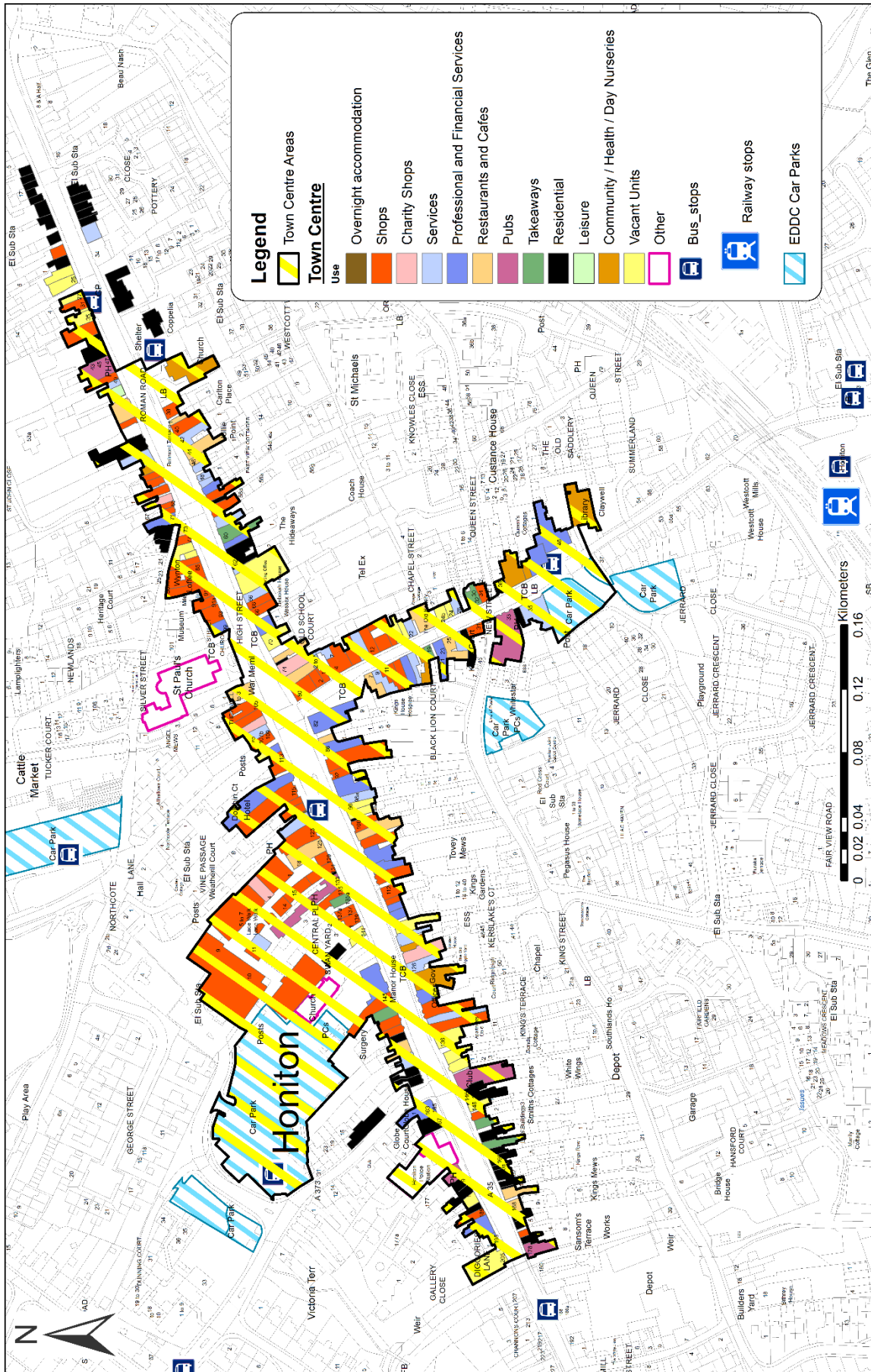
The town centre has a major supermarket in the form of a Co-op and also other larger food stores. The largest supermarket in Honiton, a Tesco store, lies on the southern edge of the town around 1.5 kilometres from the town centre. On the western edge of Honiton, 1.5 kilometres from the centre is the Heathpark business/retail park. There are a number of retail premises at Heathpark including a large Homebase and Lidl supermarket.

The first Honiton plan shows the survey frontage results. On the basis of the survey the second and third Honiton maps show the proposed policy boundary areas for the town.



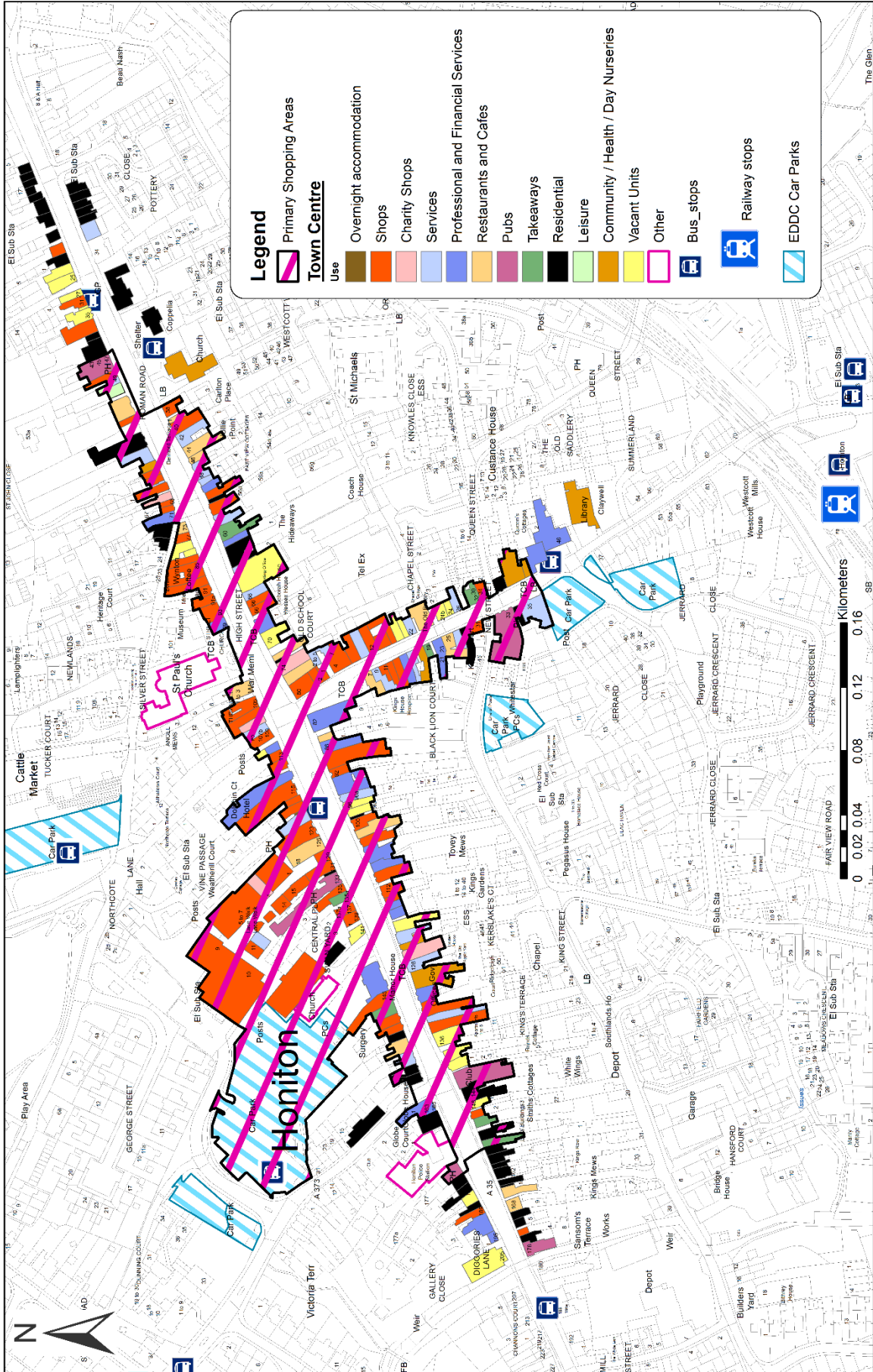
Town Centre Retail Survey - Honiton -

Honiton Proposed Town Centre Area and Primary Shopping Area Maps



Town Centre Retail Survey - Honiton -

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Town Centre Retail Survey

- Honiton -

Evaluation of Boundaries at Ottery St Mary

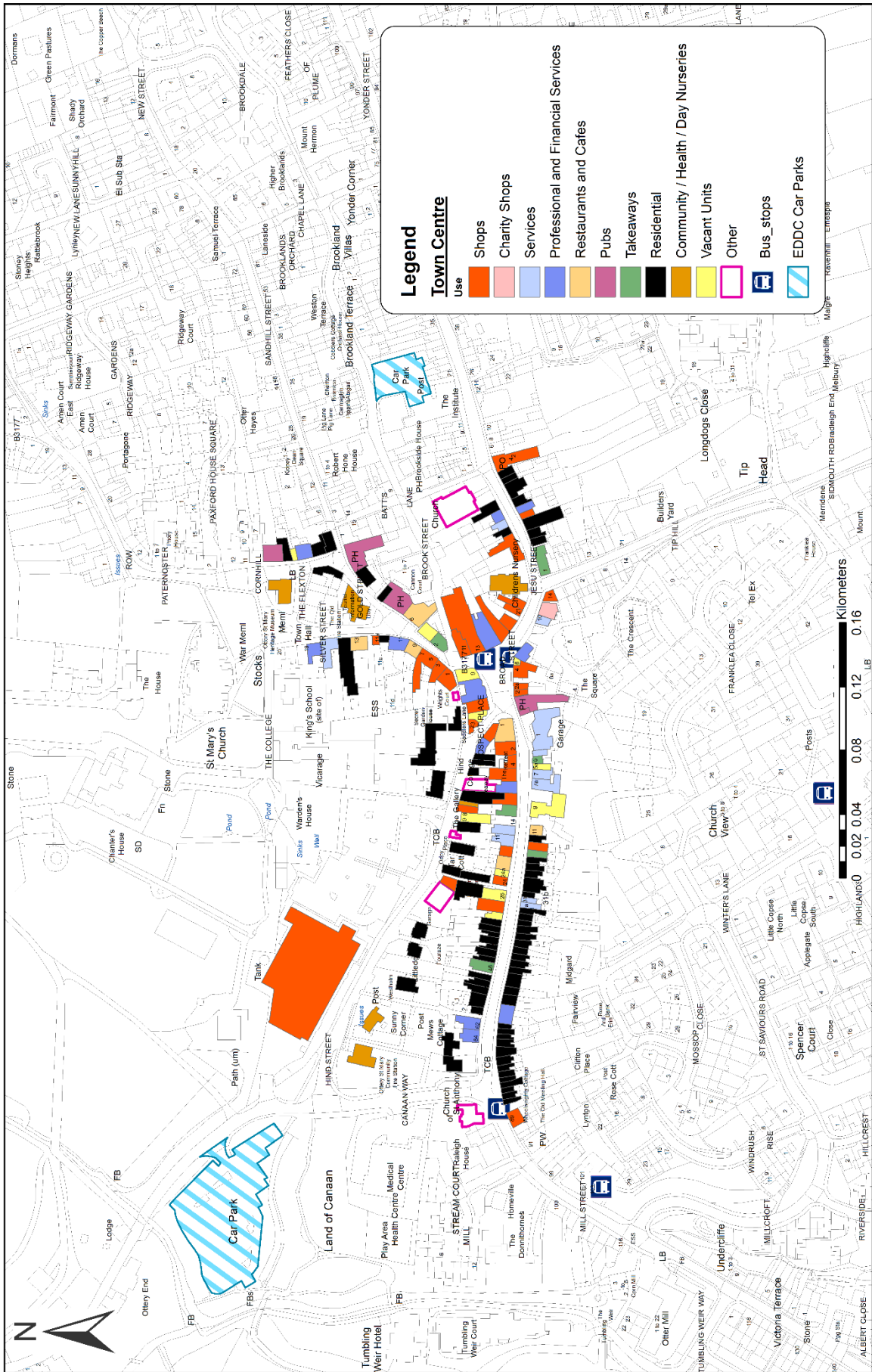
Ottery St Mary is a small East Devon town located within easy commuting distance of Exeter. The town focuses on a medieval market place, now the junction of several roads. The small historic core of the town forms the focal point of commercial activity and the town supports a medium range of mostly independent traders. There are a comparatively small number of food/drink and other non-retail commercial premises in the town and some vacant units and charity shops.

Congestion is an issue in parts of the town as the medieval layout has created several 'pinchpoints' and a lack of offstreet parking has exacerbated the situation. Shortly before the last survey an edge of centre larger supermarket, a Sainsbury store opened, and this has provided some short term car parking and pedestrian links to the town centre. As well as Sainsbury, there are a range of smaller food stores in the town. Since the last survey the number of vacant units has increased slightly.

On the northern side of the town, and divorced from it, lies Otter Nurseries a garden centre offering a wide range of retail goods and a substantial cafe. Adjoining it lie several other large cafe/retail outlets.

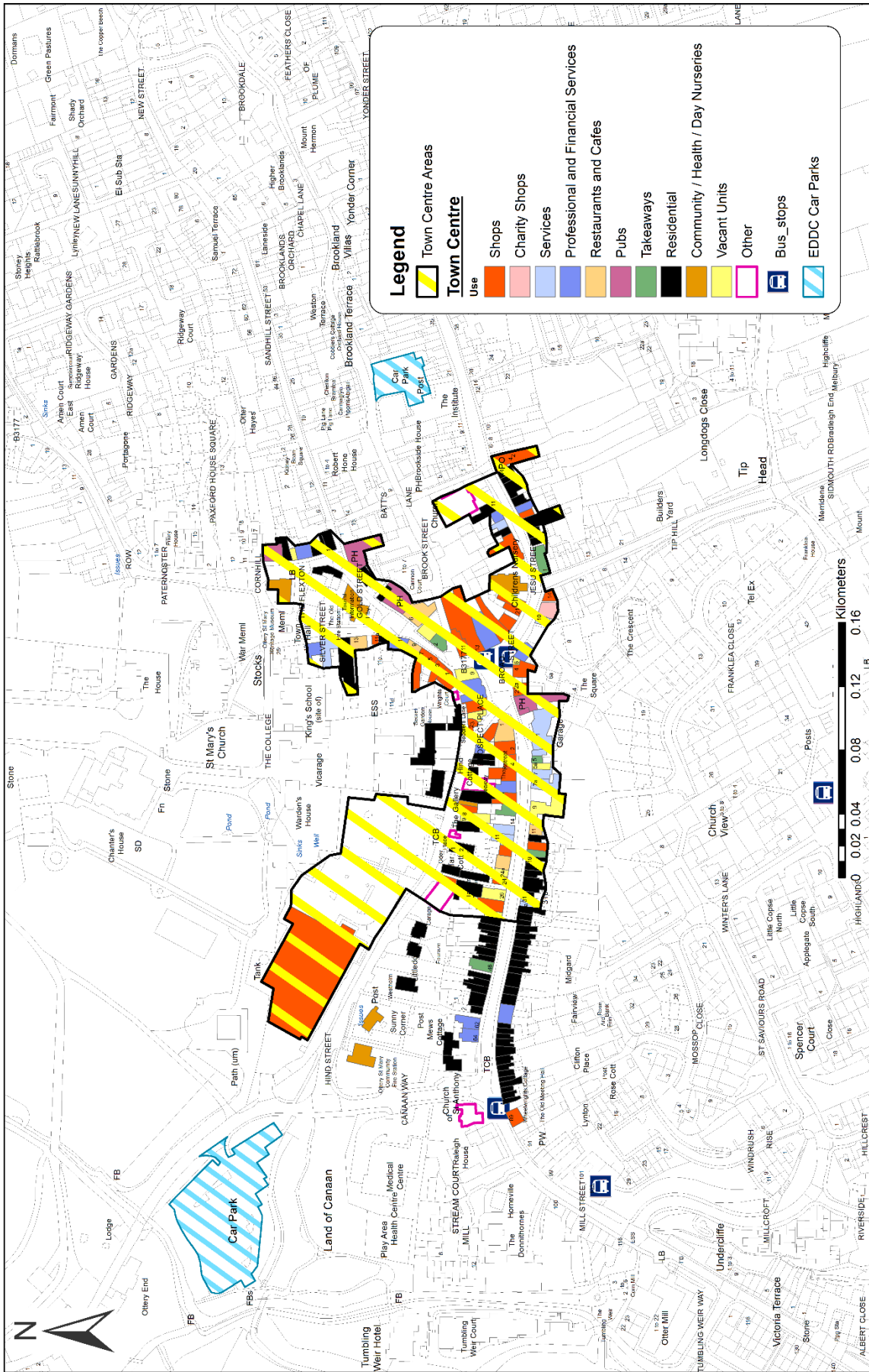
The first Ottery St Mary plan shows the survey frontage results. On the basis of the survey the second and third Ottery St Mary maps show the proposed policy boundary areas for the town.

Ottery St Mary Retail Survey Map

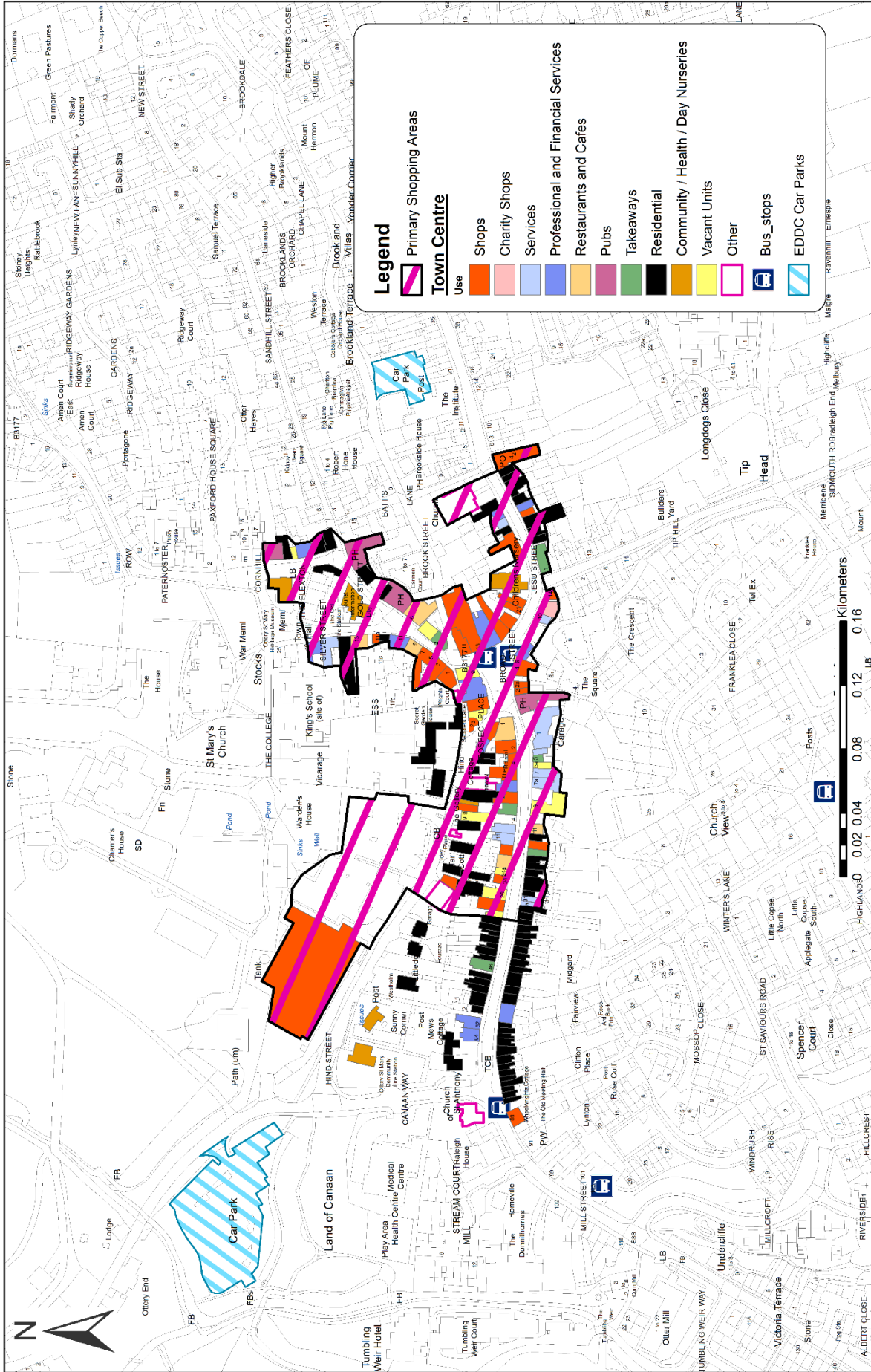


Town Centre Retail Survey - Ottery St. Mary -

Ottery St Mary Proposed Town Centre Area and Primary Shopping Area Maps



Town Centre Retail Survey - Ottery St. Mary -



Town Centre Retail Survey

- Ottery St. Mary -

Evaluation of Boundaries at Seaton

Seaton town centre is located in the southern part of the town, set back from the seafront.

The town has several shopping streets, though shops are not as tightly grouped together as in other East Devon towns. The town centre has a central pedestrianised area and is served by a number of car parks. There are a wide range of independent retailers in the town but only a limited number of national chain stores.

Although not as vibrant as other East Devon towns Seaton does benefit from a resident population trade and seasonal tourism trade. Several of the shops, especially closer to the seafront area, are targeted at a summer trade holiday market.

Seaton has a comparatively large number of café's and bars, again tailored to a seasonal holiday market.

The town does have a comparatively high number of vacant units (compared to other East Devon towns) although this is still considerably below the national average.

At the outer edges of the town centre the retail pattern/presence of shops tends to merge with increasing residential properties rather than coming to an abrupt end. There are several charity shops in the town (large numbers of charity shops are seen as an indicator of struggling centres) but this has not increased significantly since the last survey.

Supermarket provision in the town is dominated by the large Tesco supermarket that opened in late 2011 and lies to the east of the town centre. Closer to the town centre, and also on its eastern side, is a much smaller supermarket building previously occupied by Co-Op but now home to Aldi opened in 2023.

The first Seaton plan shows the survey frontage results. On the basis of the survey the second and third Seaton maps show the proposed policy boundary areas for the town.

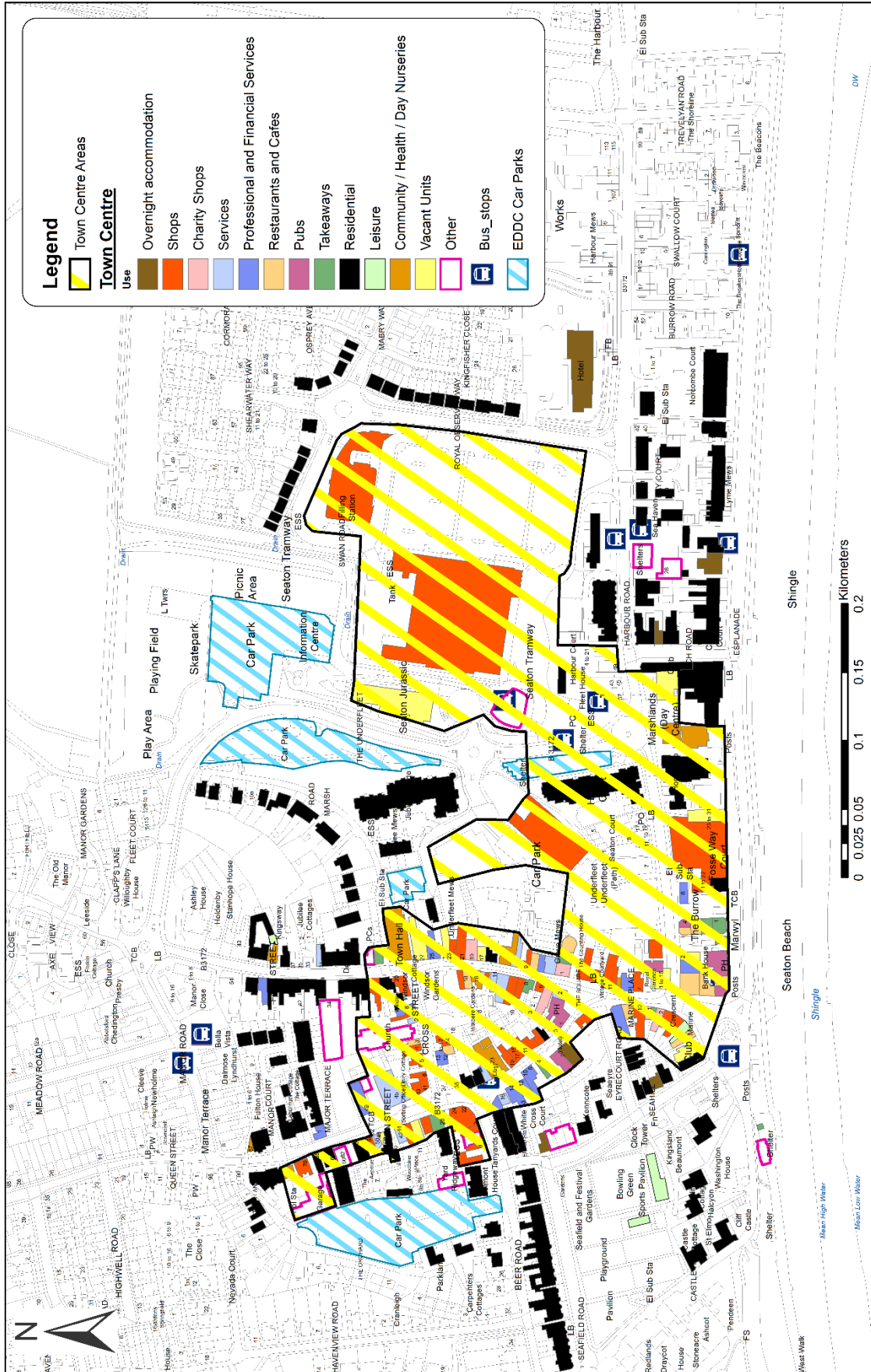
Seaton Retail Survey Map



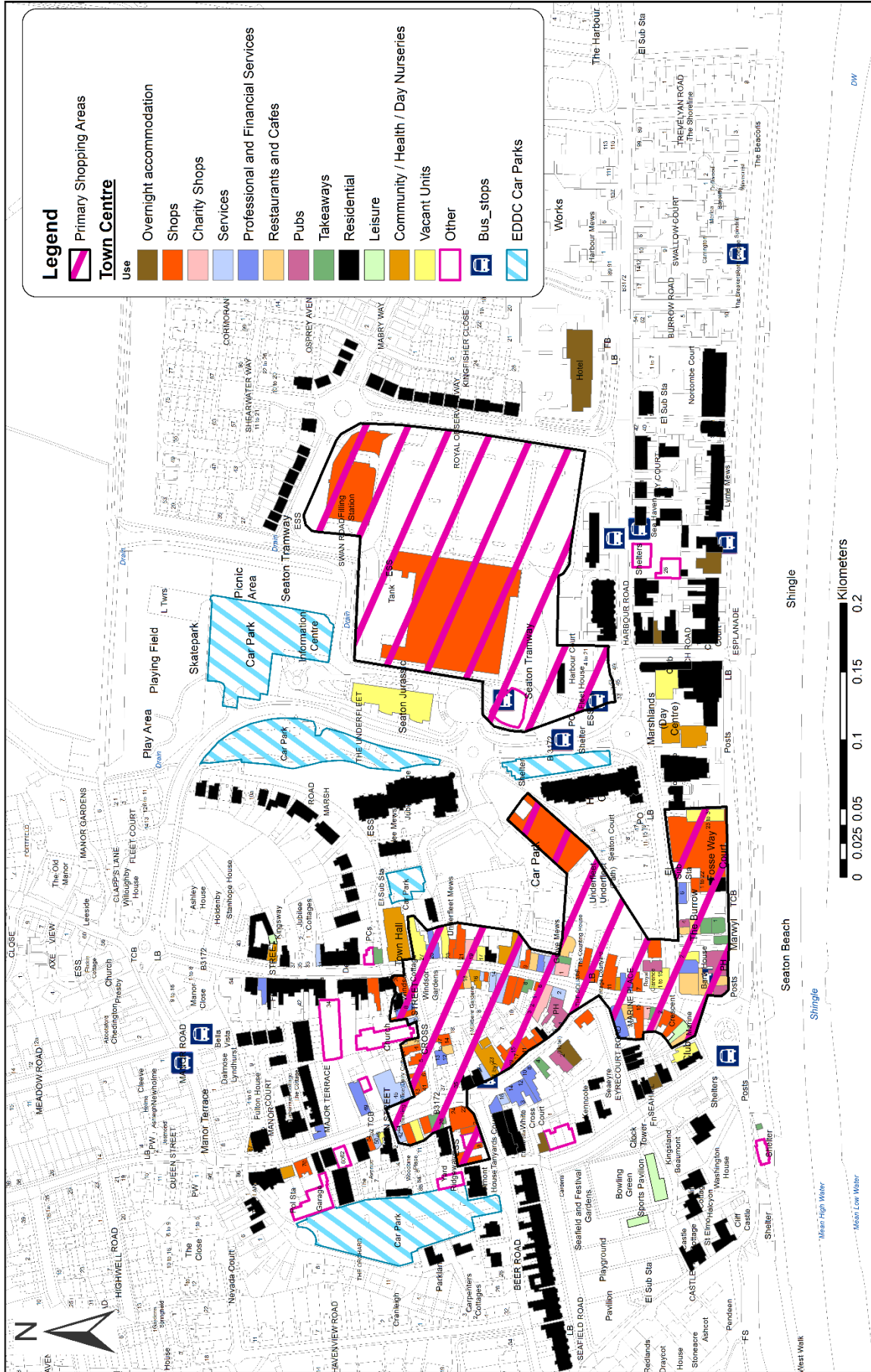
Town Centre Retail Survey - Seaton -

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Seaton Proposed Town Centre and Primary Shopping Area Boundaries



Town Centre Retail Survey - Seaton -



Town Centre Retail Survey - Seaton -

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Evaluation of Boundaries at Sidmouth

Sidmouth town centre is located in the southern part of the town set back from the seafront. Sidmouth is a commercially successful town centre with a vibrant long main shopping street (and subsidiary streets) and very few vacant units. The town centre is part pedestrianised and served by a number of car parks. The town has a good selection of independent retailers as well as a number of national chain stores.

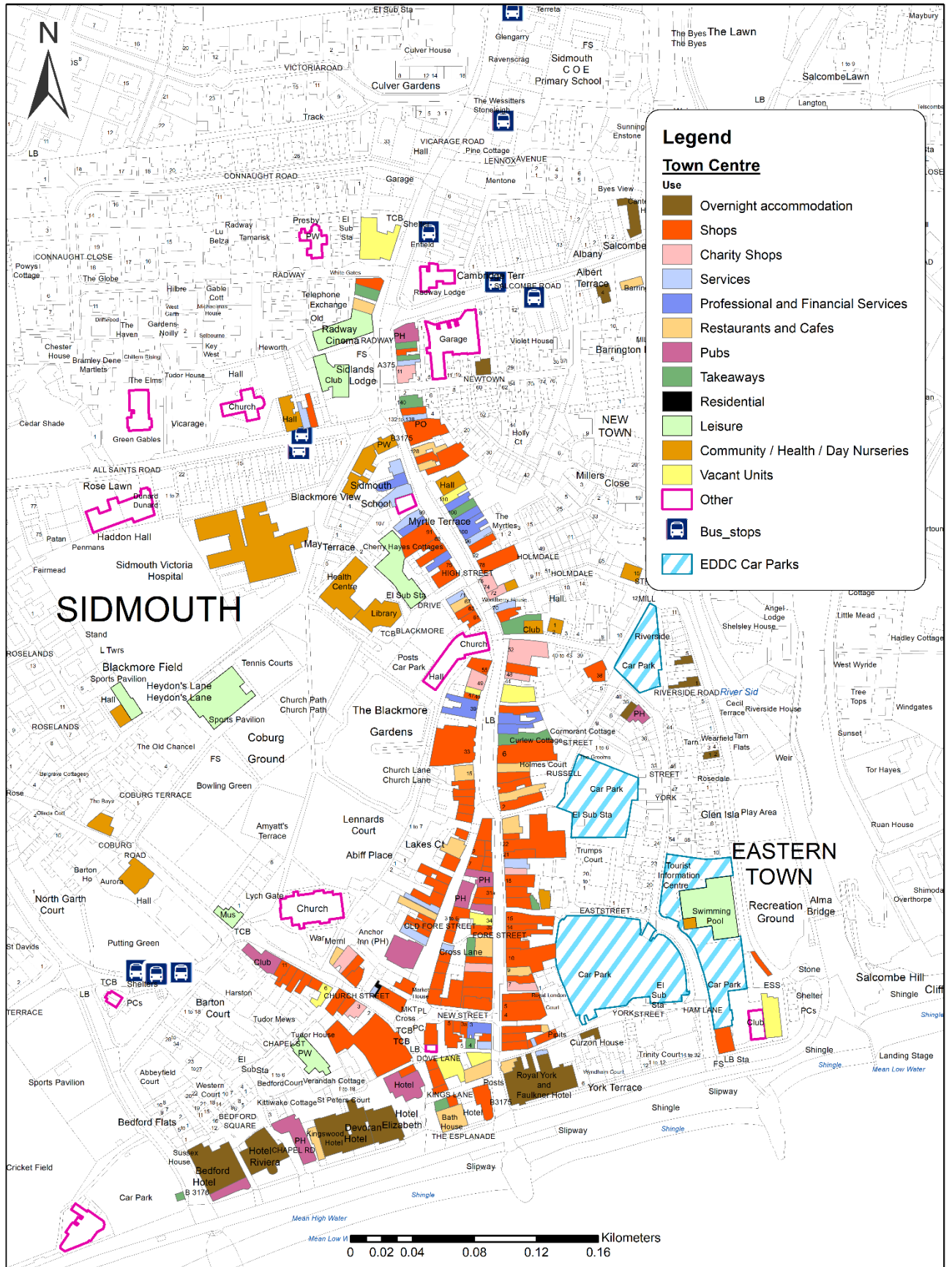
East Devon District Council, the town's major employer with around 500 staff, relocated to Honiton since the last survey but this does not appear to have had a lasting major impact on the town centre.

The town benefits from not just a resident population of shoppers but also from a vibrant tourism trade. There are no major supermarkets in the town centre although Co-op and Tesco have smaller format shops in the centre. Larger supermarkets are found away from the town centre in the form of a Lidl's store, roughly in the geographic centre of the town, and a Waitrose store on the northern edge of Sidmouth.

The first Sidmouth plan shows the survey frontage results. There is a comparatively low presence of charity shops in the town (large numbers of charity shops are seen as an indicator of struggling centres) and there are a wide selection of bars, cafés and restaurants. It is noticeable that several properties have changed use to housing since the last survey but these were mainly non-retail uses such as bank premises.

On the basis of the survey the second and third Sidmouth maps show the proposed policy boundary areas for the town.

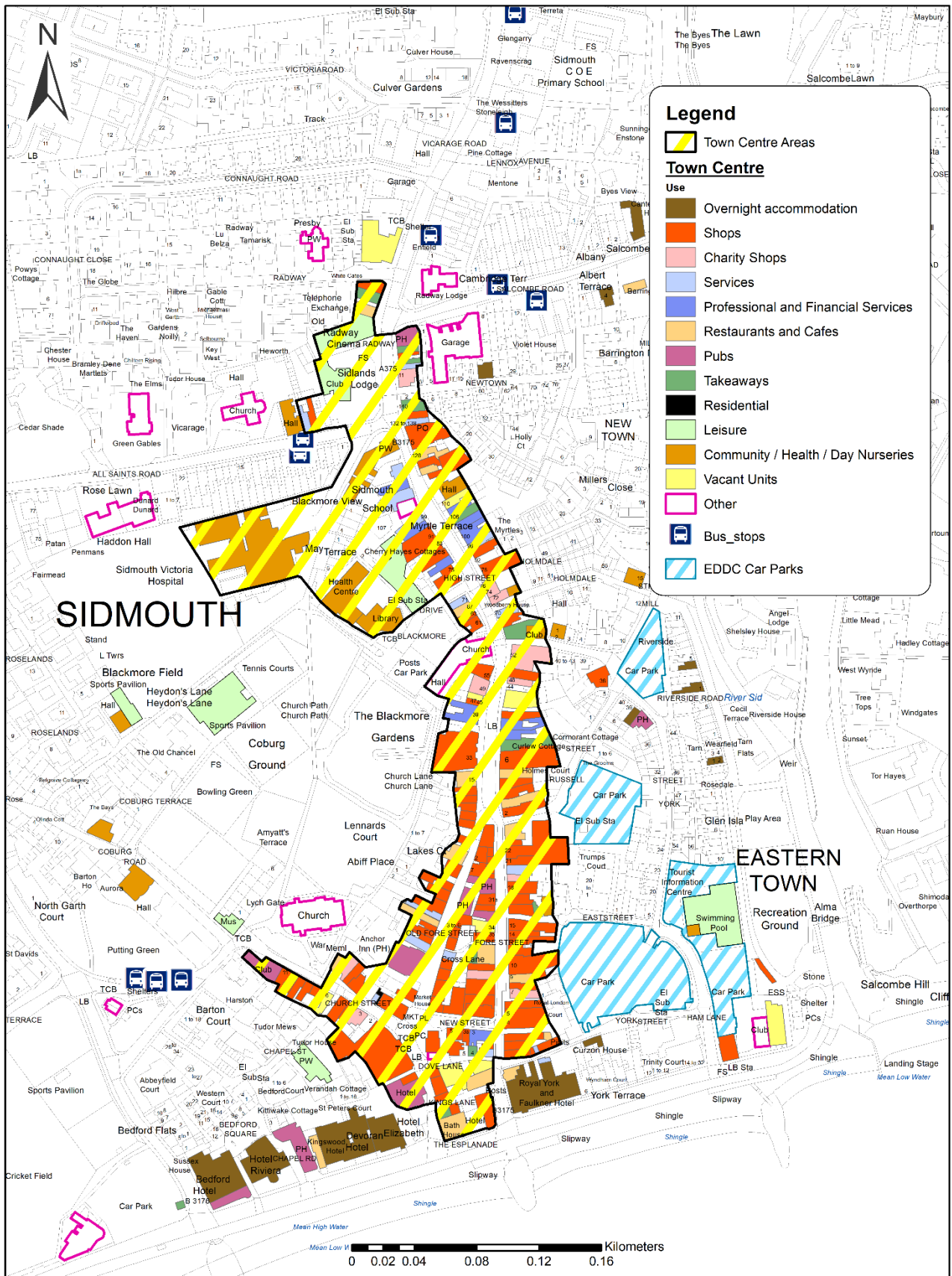
Sidmouth Retail Survey Map



Town Centre Retail Survey - Sidmouth -

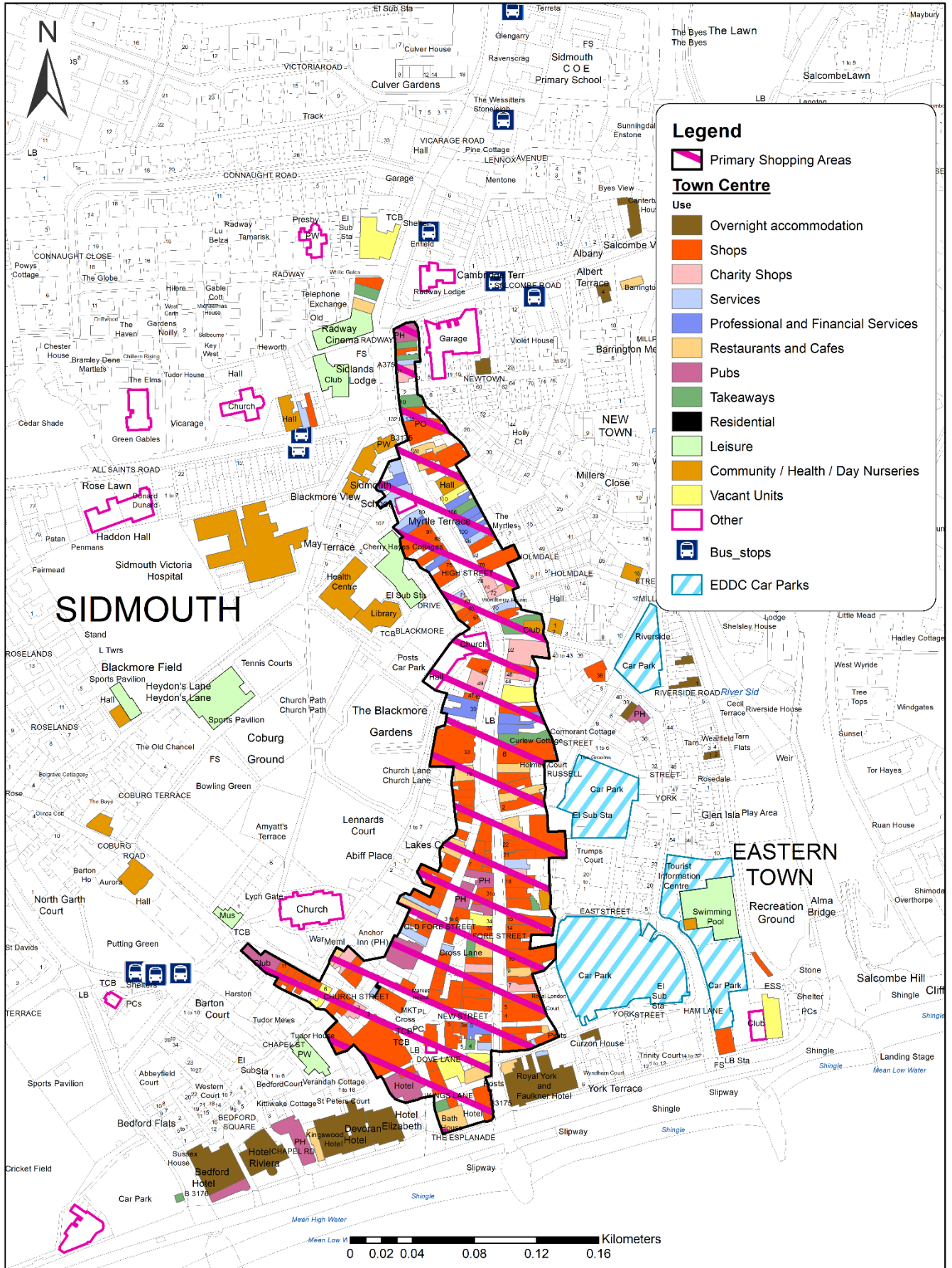
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Sidmouth Proposed Town Centre and Primary Shopping Area boundaries



Town Centre Retail Survey - Sidmouth -

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Town Centre Retail Survey - Sidmouth -

Conclusions

The town centres of East Devon all offer a reasonable range of stores and all can meet day to day shopping needs, the possible exceptions being Budleigh Salterton and Cranbrook (currently) which lack a larger supermarket. Beer and Colyton offer smaller foodshops which can still meet most residents everyday needs and are within relatively short distances of the large supermarket at Seaton.

With the exception of Cranbrook, the inland town centres all focussed on, and grew up around, their medieval street markets and these have been a key reason for the road layouts today. These markets have only been retained on a weekly basis in Axminster and Honiton, although all of the towns have less regular 'special' events. The potential to increase the number of street markets, as encouraged by the NPPF, is constrained by the lack of town centre space available on a very regular basis and the need to temporarily close roads or car parks for such activity.

Whilst there are varying degrees of commercial activity in all of the towns and some, notably Sidmouth, are more vibrant than others none of the towns are dominated by vacant stores and/or charity shops.

On this basis the town centres of East Devon can be seen to be performing well compared to many other town centres and High Streets in Britain.

On the basis of the survey work undertaken it is credible and desirable to define town centre areas and primary shopping areas for the towns of East Devon. Proposed areas are defined on the maps in this report. Views are welcomed on this report which will be subject to refinement and will be used to justify policy in the East Devon Local Plan through to submission and examination.

APPENDIX 1- Summary of Responses to the Issues and Options Consultation

Chapter / Topic / Qu	Summary of main issues	Officer response
Town Centres / 15 / Summary	<p>Most respondents favoured mixed commercial uses in town centres, with over half of respondents supporting leisure or community uses and very little opposition to these. Dominant retail use (as has traditionally been promoted by policy) received around 30% support and a similar level of opposition. In the written comments the use of upper floors for services, community activities and housing was strongly supported and a range of measures suggested to encourage this.</p> <p>A significant proportion of respondents (around 20%) were opposed to change of use to housing, although this also received considerable (quantified) support. In the written comments most concern related to the permanent loss of retail units to housing and the consequent impact on the retail function of the town centres. Edge-of-centre and first floor residential use received considerable support.</p> <p>The need for town centres to be vibrant social spaces was expressed by many respondents. A range of activities, areas to sit and increased community, health and service uses were seen as a major draw.</p>	The responses are noted and will inform Town Centre policy.
Town Centres / 15 / General	The objective should be to build self sustaining communities for a diverse range of people/ retaining community cohesion and high footfall	This will be a key policy aim
Town Centres / 15 / General	Service industries and cafes should be encouraged to improve vitality. If these can be established above shops that would double the footfall	These are uses which are encouraged in town centre policy.
Town Centres / 15 / General	A strong focus on heritage, culture and the arts to make each town centre special	This is an objective of the town centre and built heritage policies.
Town Centres / 15 / General	Plan for social spaces (cafés, gardens, stalls, pop-up shops) to encourage use of outside areas. Encourage street markets, music, food events to create vitality	Noted. Policy encourages such uses but the temporary nature and 'on street' location means that the actual events are beyond the scope of the local plan.

Chapter / Topic / Qu	Summary of main issues	Officer response
Town Centres / 15 / General	Uses at first floor and above should be strongly encouraged- Gyms and leisure uses, housing and community use	This will be a key policy aim
Town Centres / 15 / General	Housing should not dominate but should be integrated to maintain a mix of uses and reduce vehicle movements/Allow housing on the edge of centres but retain centre for shopping/services. Only allow housing where adequate facilities (including parking and outside space) can be provided for the residents.	This will be a key policy aim
Town Centres / 15 / General	A split of opinion between it being better to have housing than empty shops and concern that, once a shop is changed to housing, it is permanently lost.	Noted
Town Centres / 15 / General	Retail uses should be promoted in town centres and footfall is still encouraged despite on-line shopping. This could include town centre showrooms with goods available to see/try on before collection/delivery from warehouses, speciality retailers and goods collection points e.g. for those who aren't at home to collect packages.	Noted. The town centre and primary shopping frontage policies aim to encourage and retain retail uses.
Town Centres / 15 / General	Greater pedestrianisation (day-time car free streets) and more convenient public transport	Traffic management is a County Highways matter but policy can support greater pedestrianisation and improved access to public transport through the strategic and design policies of the plan, by directing development to those settlements best served by public transport and by making layouts accessible and convenient to walkers.
Town Centres / 15 / General	Cheaper business rates, car parking and affordable space for community groups and arts	This is beyond the scope of the local plan
Town Centres / 15 / General	Promote shared community use- for sports/gyms but also education/culture/spiritual uses	Policy will require this

Chapter / Topic / Qu	Summary of main issues	Officer response
Town Centres / 15 / General	Potential for seaside towns to be redeveloped, prioritise removing existing eyesores and establish a coherent character for new development	This will be addressed through the local plan town-specific chapters and design policies
Town Centres / 15 / General	Rural settlements should not lose existing retail and community facilities.	Policy will resist the loss of existing facilities in these settlements and encourage provision of new/additional facilities.
Town Centres / 15 / General	Need to accept that private cars are inevitable in rural areas	Noted. Policy intent is to reduce the need to travel and the impact of private vehicles through a combination of settlement self-containment, directing new development to the most sustainable locations, encouraging walking, cycling and public transport and requiring provision for electric vehicles.
Town Centres / 15 / General	Policy should be flexible so that it can quickly respond to changing circumstances	Policy is intended to be flexible and responsive.
Additional town centre policy objectives / 16 / Summary	Paragraph 7.6 of the Issues and Options report identified three additional areas where policies may be appropriate including the use of vacant stories over shops, resisting 'out of town' uses to support town centres and producing town centre masterplans to identify key areas for improvement. Views were sought on whether these were appropriate. Although most respondents (67%) ticked the yes box, a number did suggest other objectives or qualify their choice.	Support for the suggested additional policy areas is welcomed.
Additional town centre policy objectives / 16 / General	Different responses are needed for each town centre. These should be produced in consultation with the local community and neighbourhood plans.	It is envisaged that the Plan will include town-specific chapters, with policies informed by consultation and NP's (as well as other evidence)
Additional town centre policy objectives / 16 / General	Out of town retailing should be resisted and, where it is allowed, should have similar conditions to town centres e.g. parking charges and be accessible to pedestrians and cyclists	It is envisaged that a sequential approach will be taken, with town centre locations being preferred to out of town locations. Parking charges are not within the control of the local plan

Chapter / Topic / Qu	Summary of main issues	Officer response
Additional town centre policy objectives / 16 / General	Make centres pedestrian and public transport friendly. Make car parking cheap or free.	The local plan will promote sustainable methods of transport and design/layouts which facilitate public transport, cycling and walking. Parking charges are not within the control of the local plan
Additional town centre policy objectives / 16 / General	Offer a town wide online presence so small retailers can offer goods online and share costs	This is a town management matter and is outside the scope of the local plan
Additional town centre policy objectives / 16 / General	Need to promote local foods and goods, encourage farm shops but not as competition to the High Street shops (or there could be a co-op shop for local farmers to sell through)	This is a town management matter and is outside the scope of the local plan
Additional town centre policy objectives / 16 / General	Redevelop out of town shopping areas as housing (especially sheltered housing)	It is intended that retail uses on employment sites would revert to employment uses if retail is no longer viable. Permitted development rights (depending on size and location) may allow retail units to be converted into houses without permission in some cases.
Additional town centre policy objectives / 16 / General	Accept out of town retailing and improve access to it and the shopper experience. Encourage linked trips to town centres.	A sequential approach will be taken, with town centre locations being preferred to out of town locations.
Additional town centre policy objectives / 16 / General	Make town centres social spaces and focus on the shopper experience	It is envisaged that this will be a key aim of town centre policy

APPENDIX 2- Summary of Responses to the Draft Local Plan Consultation

Policy 56 - Town centre hierarchy, sequential approach and impact assessment

- Unsure how this will regenerate town centres.
- Support that out-of-centre sites should be accessible by bicycle and well connected to the centre.
- 'Edge of (town) centre' developments should only be allowed where it is shown there will be no adverse impact on the vitality and economic vibrancy of its nearby town centre.
- Prefer current policy.
- This hierarchy seems wrong. Tier 3 centres vary considerably. Budleigh is fairly large. Lymington has a train line. The other three settlements should be tier 4.
- The accessibility of edge-of-centre and out-of-centre sites on foot and bike needs to be such that anyone can use the provision rather than only being possible for those who are fit and able or confident enough.
- Exmouth town should be redeveloped as it has lost its historic character and is bland and run down. This could extend to celebrating maritime heritage on the seafront, restoring the arcade building and building a new swimming pool with hot tubs
- Independent businesses with a focus on sustainability need encouraging. Farm shops could be located in towns.
- Focus housing in the town centres (especially Exmouth) as an alternative to building on the AONB's/countryside
- Shop frontage and signs must also be kept in keeping with the heritage of the area as this too can have a negative impact on the area.
- Artisan markets and craft markets and farmers markets should be encouraged
- Out of centre sites should be actively discouraged and policy should reflect this. A 'sequential test' is very unlikely to be robust enough to protect our town centres.
- The policy does not recognize the problems that our town centres face, the issue of adequate and cheap parking, and does not offer any hope for improvement
- Sidmouth Cycling Campaign support the policy that out of centre sites should be accessible by bicycle and well connected to the centre.
- Exeter Cycling Campaign would like 'by these modes' to be added after 'centre'. Currently this doesn't actually say that they should be well-connected to the centre by public transport, bicycle and foot. They can be accessible from some other point by all those things, but not necessarily the centre, so this should be explicitly stated.

Policy 57 - Town Centre development

- Devon County Council welcome this policy but suggest it is strengthened to ensure there is no overall erosion of critical mass of activity within its retail core.
- Devon Wildlife Trust advised the requirement for enhancement of the natural environment should be included within this policy. The provision of well designed, connected, diverse natural corridors through town centres can act as important flagship projects showcasing the benefits of the natural environment.
- Cranbrook town centre is poorly designed and doesn't really exist. It isn't clear where the shops are/will be and they aren't close to the station.
- Support the reference to shop frontages as it is consistent with the current SPD relating to Exmouth's shop front policy.

- Object to loss of retail premises to housing.
- The statement that change of use to residential will only be permitted if 'there is no demand for town centre use' should be strengthened. With an increasing number of businesses closing it would be good to see more positive proposals for invigorating town centres.
- Should Beer really be in this group?
- Exmouth Town centre lacks visual appeal. There needs to more character and are good examples of this are Sidmouth, and cities such as Bath.
- Rejuvenation (of Exmouth) is a must and to encourage independent, sustainable businesses rather than more hairdressers, charity shops and fast food outlets.
- This is a standard version of a long-established policy. The use of upstairs accommodation for residential purposes is greatly discouraged because many of our town centre buildings are listed or are situated in a Conservation Area, so alterations to allow occupation are very expensive and are often rejected.
- Exeter Cycling Campaign would like to explicitly mention the need to enable cycling as a means of transport, with prominence given to properly-designed and located cycle parking. Towns like Honiton and Axminster currently have very few Sheffield cycle parking stands and these are often inconveniently located.
- Churchill Retirement Living supports the proposed Exmouth Town Centre boundary.

APPENDIX 3- Methodology for Town Centre Policy Evaluation

Note- this was produced as an internal document to guide Officers in undertaking the work and therefore constitutes a background document only.

Town	Tier
Exmouth	One- Principal Centre
Axminster	Two- Main Centre
Cranbrook- addressed in the Cranbrook Plan	Two- Main Centre
Honiton	Two- Main Centre
Ottery St Mary	Two- Main centre
Seaton	Two- Main Centre
Sidmouth	Two- Main centre
Budleigh Salterton	Three- Local Centre
Colyton	Three- Local Centre
Beer	Four- Service Village

Summary- Two plans to be produced for each town:

the first will identify the main ground floor uses (this work should be undertaken in the next few weeks)

the second will identify the town centre area and the primary shopping area based on these uses (following a team discussion to ensure a consistent approach)

The plans should also identify any possible areas for regeneration/redevelopment within, or close to, the town centre and areas within the town centre which could be used for temporary or community events, including pop-ups and markets.

This will be accompanied by a short text identifying the special characteristics of the town centre, discussing the current uses and town centre 'health' (at a high level) and considering the possible future availability of vacant/underused/regeneration sites in and around the town centre.

The NPPF requirements and definition of terms is set out in the report.

Introduction

1.1 The NPPF requires the Local Plan to 'define a network and hierarchy of town centres' (see appendix 2) and this corresponds to the table above. Budleigh, Colyton and Beer are included on the list because they all have recognisable main shopping streets and we wish to see their retail function protected. Cranbrook town centre is not yet established but for future reference the survey will record what is there.

1.2 The NPPF then requires policy to 'define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre'. The starting point for this work will be an evaluation of existing retail activity in the town centres and indications of town centre health.

Survey methodology

2.1 In March 2012 surveys were carried out in the seven main towns of East Devon. These will be the starting point for the current assessments. The March 2012 surveys assessed the principle use of the frontages of buildings in the town centre areas at ground floor level only. The frontages of buildings were classified on the basis of the following (Use Class) categories:

March 2012 survey:

- A1 – shops (shown in red on plans) with charity shops forming a sub-category (this included uses such as hairdressers and opticians);
- A2 – Professional and financial services (blue);
- A3 – Restaurants and cafes (orange);
- A4 – Pubs (purple);
- A5 – Takeaways (green)
- Vacant units (yellow); and
- Other (no colour/grey on maps).

2.2 Since the previous survey the Use Classes Order has undergone a significant revision and so this study will be looking at a wider range of uses than the 2012 study. Many of the Class A uses have been incorporated into the new Commercial, Business and Service use Class E and this is identified in the NPPG as 'a broad and diverse range of uses which principally serve the needs of visiting members of the public and/or are suitable for a town centre area'. Class E allows for a mix of uses which recognises that a building may be in several different uses concurrently or be used for different uses at different times of the day. The class incorporates the whole of the previous shops (A1) (apart from those that now fall within scope of the F2 Local Community use class), financial and professional services (A2), restaurant and cafes (A3) and business (B1 including offices) use classes, and uses such as nurseries, health centres and gyms (previously in classes D1 non-residential institutions, and D2 assembly and leisure) and it seeks to provide for new uses which may emerge and are suitable for a town centre area. Not all uses of land or buildings fit within the use classes order and this 'sui generis' category (which can't change use as PD) includes theatres, public houses, hot food takeaways, petrol stations, taxi businesses, and casinos (these examples are not exhaustive).

2.3 In the first instance the study requires Officers to:

- survey the town centre, identifying the predominant ground floor uses as per the box below, taking the 2012 survey as a starting point to identify the extent of the town centre but being mindful of the new use classes.
- Identify any accessible open spaces in the town centre or edge of centre which could be used for temporary or community events, including pop-ups and markets as the NPPF encourages these.
- make notes of any areas within or close to the town centre, which could potentially be suitable for redevelopment, regeneration or for uses which can't find suitable town centre sites (eg supermarkets).

2.4 It should be noted that it is the street frontage that will be surveyed and the frontage that is the critical component of the survey work. It will be difficult to accurately assess the floorspace for any use and so it will be assumed that the whole ground floor is in the use recorded unless it is indicated otherwise (for example by stating that the use does not occupy the whole 'depth' of the building, or that the internal space is clearly divided between several uses and estimate what that

split should be). To increase accuracy, business rate records and planning permissions can be used as necessary but may not be available in all cases. In the absence of this more detailed information, for ease of mapping Ordnance Survey defined building plots/blocks will be coloured in. A health warning will explain that the colouring in of plots/blocks will not indicate that all of the coloured in area is in a given defined use or function nor that there are active frontages (eg shop windows) on all external sides of premises.

2.5 Ideally, this survey would extend to upper floors but in practice this is difficult to undertake without entering the building and discussing the use with the occupiers. From outside it is not easy to differentiate between many uses, particularly residential, storage, vacant units and office space unless there is external signage, labelled door bells or similar. Given the resource constraints it is not proposed that the survey extend to upper floors.

- Shops (red) with charity shops forming a sub-category
- Service uses such as hairdressers, opticians, nail bars and other 'experiences' (light blue)
- Professional and financial services (dark blue)
- Restaurants and cafes (orange)
- Pubs (purple)
- Takeaways (dark green)
- Houses (grey)
- Leisure (bright green)
- Community/health/day nurseries (although these are not the same use classes) (brown)
- Vacant units (yellow); and
- Other (no colour)

2.6 To ensure consistency, once the first stage survey work is complete the team will discuss boundary definition using an example town. In line with the NPPF, the policy approach will be one of defining Town Centre areas to encompass broad central areas in towns where there is existing retail and commercial activity and potential to accommodate more activity. Using this survey information the team will seek to identify the extent of the Town Centre and the Primary Shopping Area on a map (this will be transferred onto the Proposals Map later). The town centre should be of a size that ensures it is large enough to provide flexibility and scope for more activity but without being so large that it could lead to dispersal of commercial activity into separate unconnected areas of the town. Ease of physical movement and connectivity is seen as critical, therefore the defined shopping area should be comfortable to walk around and across for reasonably active people. Uses which support, and are essential to, town centre activity, for example public transport hubs, should be included within the town centre as we would not want to lose these to other uses. Given the range of uses in Class E (and the permitted changes between uses) and the relatively constrained town centre areas, these areas may coincide but this is a matter for discussion.

Town Centre Health

3.1 The presence of charity shops, along with vacant units, is considered to be an indication of poor town centre health (they typically pay less rent than other retail uses and enjoy rate relief and so their presence suggests a lack of demand for premises from other retailers). Please note which units are charity shops as this will inform the commentary. We have the 2012 maps for comparison and changes over the past 10 years should be noted and it should be possible to identify buildings/areas where vacancy is an issue.

Primary Shopping Frontages

4.1 In previous plans we have identified Primary Shopping Frontages which were tightly focussed on the principal areas of retail activity and commercial facilities with 'active' frontages which contribute to the vitality of the area. I do not propose to identify PSF's in this plan because the new E class allows the loss of retail to non-retail uses as permitted development and so it is superfluous.

Commentary

5.1 Please produce a short commentary for the town to provide an overview of the special characteristics of the town centre, an example from the 2012 study is provided over the page. The commentary should discuss the current uses and 'health' of the town centre (at a high level) and consider the possible availability of sites in and around the town centre for alternative uses in future. If there are longstanding regeneration aspirations for some towns eg Websters Garage in Axminster, or prominent long-term vacant buildings then these should be mentioned.

Appendix 1 (to the Survey methodology)

NPPF Requirements and Definitions of Terms

90. Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:

- (a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;
- (b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;
- (c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;
- (d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least 10 years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;
- (e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and
- (f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

NPPF Definitions

Edge of centre

For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

Main town centre uses

Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs,

nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Out of centre

A location which is not in or on the edge of a centre but not necessarily outside the urban area.

Primary shopping area

Defined area where retail development is concentrated.

Town centre

Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area.

References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

APPENDIX 4- Sequential Test Impact Assessment Threshold

The National Planning Policy Framework, in Paragraphs 90-95 requires all proposals for main town centre uses which are not in an existing centre or do not accord with an up-to-date plan to be subject to a sequential test. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500m² of gross floorspace). In the current adopted Local Plan this threshold is set at 500 m².

The Council does not consider that the default 2,500m² gross threshold provides sufficient comfort that retail development across East Devon can be controlled in terms of its impact. In common with many historic market and coastal towns, premises in East Devon town centres tend to be smaller, often single fronted but capable of combination or extension, as well as use of upper floors. In order to determine an appropriate threshold we have considered the scale of existing retail stores across the town centres in the District, particularly those stores which underpin/anchor defined centres.

In relation to convenience retail provision, there is a wide range of store sizes with many of the larger supermarkets either in edge or out-of-centre locations. Town centres generally have smaller foodstores. In many cases, the smaller foodstores provide an important contribution to the health of centres and in some cases provide an anchor role. In many cases they are also the largest units in town centres and therefore proposals for similar sized stores in edge or out of centre locations are unlikely to be caught by the sequential test as no comparable vacant premises/sites will exist. Therefore, we consider that a trigger point of 500 m² gross for retail proposals involving the potential sale of convenience goods continues to be appropriate in the Local Plan. This should apply to new stand alone retail floorspace, proposed extensions to existing stores and applications to vary the range of goods to be sold from existing floorspace. In addition, we consider that this threshold should apply consistently across the whole of the District for both edge of centre and out of centre locations.

In respect of comparison goods retailing a similar exercise has been undertaken. There are a wide variety of unit sizes, varying from smaller units in general in the smaller town centres with a larger average size of unit in centres such as Exmouth, Sidmouth and Honiton. In out of centre locations, unit sizes tend to be large, focusing on large format bulky goods sales. Generally speaking, single comparison goods retailers do not provide a lone sole anchor to defined centres, although the range and quality of comparison goods retailers provides a very important contribution to their health and attractiveness. With such a range of retailers present in the East Devon area it is difficult to be precise over the exact scale of floorspace which could have a detrimental impact upon the health of defined centres, however given trends in the retail sector in recent years and the evolution of the retail warehousing sector, we consider that a trigger of 500 m² gross floorspace should also be applied to impact assessments for comparison goods floorspace. This should also apply to new stand alone retail floorspace, proposed extensions to existing stores and applications to vary the range of goods to be sold from existing floorspace. This threshold should also apply to bulky and non-bulky goods proposals and, like convenience goods uses, be applied consistently across the whole of the East Devon area for both edge of centre and out of centre locations.

The 500 m² threshold has been successful established for a number of years. The Council considers that it continues to strike an appropriate balance between control over inappropriate development and not becoming overly restrictive or onerous to applicants.

Report to: **Strategic Planning Committee**

Date of Meeting: 5 March 2024

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



East Devon Playing Pitch Strategy

Report summary:

This report provides details of work to date on production of the Playing Pitch Strategy for East Devon. It is highlighted in the report that substantive work has been undertaken on the evidence gathering side of strategy production, this has been undertaken in accordance with Sport England guidance. As we near completion of this evidence side of work we will need to move onto the strategy (the what do we do about it) element of the work. Amongst other matters committee are asked in this report to consider how they may wish to progress matters. It is also highlighted that there is a forthcoming report to the Cabinet of East Devon District Council that will address matters and raises considerations around how the Council may choose to be more pro-active in delivery of leisure and sporting services. The available resources will impact on what the strategy should contain since any strategy should be deliverable.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

1. That committee note the ongoing work on production of the Playing Pitch Strategy and provide in principle support for the work to date and direction of travel.
2. That committee consider making a recommendation to the Cabinet meeting on the 27th March 2024 regarding the role that the Council should play in the delivery and enhancement of playing pitch provision in the district and the resources that should be put in place to enable this work.
3. That committee note that following resolution on the Council's role in delivering the new Playing Pitch Strategy and the resourcing of this work, a strategy to address the issues highlighted by the work will be developed with the sports governing bodies and clubs and brought back to the committee as a final draft of the strategy in the summer.

Reason for recommendation:

To ensure Members of committee are aware of the emerging Playing Pitch Strategy and the need, assuming the Council wishes to see better facilities, of Council actions, coordinated with others, to see delivery of enhanced pitch provision.

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: Medium Risk;

Links to background information

Links to 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. An overview of sports planning and provision

- 1.1 The role of a Playing Pitch Strategy (PPS) is to understand the levels, quantities and quality of existing playing pitches, compare this against current and projected future levels of use, need and demand and to draw up actions to address requirements of the future.
- 1.2 The Planning Policy section at East Devon District Council has taken the lead role in production of this PPS. The new strategy will supersede an earlier strategy that was completed in 2015 and the new strategy has been produced in collaboration with Sport England and the following National Governing Bodies: (NGBs), at County/Regional level:
 - England and Wales Cricket Board
 - England Hockey Board
 - The Football Association
 - The Lawn Tennis Association and
 - Rugby Football Union.

- 1.3 The Playing Pitch Strategy works with and is informed by the Council's adopted Leisure Strategy and also sits alongside the Council's Built Facilities Strategy.
- 1.4 In somewhat simplified terms the Built Facilities Strategy is concerned with sports that are played indoors and the PPS is concerned with sports played outdoors. But of course in reality some sports are and can be played at competitive level both indoors and outdoors. This indoor/outdoor split applies even more so in respect of training activity, non-competitive games and differing codes, formats or variations on the mainstream sport.
- 1.5 It is highlighted that the PPS is primarily concerned with pitch and court needs, demands and provision in respect of:
- cricket,
 - hockey
 - football
 - rugby (Union) and
 - tennis.
- 1.6 It is recognised that there are many other sports that are played outdoors in East Devon, including, at higher participation levels, netball and bowls. But these other sports, inline with common approaches taken to such work, are not addressed in any depth in the PPS. In subsequent council work there may be the desire to broaden council thinking and work around such other outdoor sports. It is also recognised that many spaces used for formal sports use can also provide for wider recreation and amenity use (though noting some other uses, such as dog walking and associated waste, can be directly incompatible with sports use). Also sports pitches can provide aesthetically attractive green spaces.

2. The benefits of having an up-to-date PPS

- 2.1 An up-to-date PPS ensures that there is a good understanding of sporting activity and of the challenges that currently exist in meeting the needs of clubs and the opportunities to plan for the future.
- 2.2 The PPS is, therefore, a valuable tool to help understand where actions and activities may be directed, what resources may be needed and how and why decisions may or should be taken. It provides strong evidence to inform and justify the actions and activities of the Council and wider partners.
- 2.3 Provision of sport facilities can often be very expensive and frequently will rely on multi-agency partnership approaches to fund and deliver them. A PPS should provide a framework for agreeing and articulating such approaches and as such can be instrumental in ensuring partnership funding of initiatives. This can be especially important where funding bids are made to sport's governing bodies or third-party sponsors and organisations to help finance proposals.

3. Sport England Guidance and the draft status of the PPS

- 3.1 Sport England has issued detailed guidance, drawn up in collaboration with sport governing bodies, on the process for preparation of a PPS [pps-guidance-october-2013-updated.pdf \(d1h1m5892gtr7.cloudfront.net\)](https://www.cloudfront.net/d1h1m5892gtr7/pps-guidance-october-2013-updated.pdf)

There are five stages of work set out:

- STAGE A – Prepare and tailor the approach
- STAGE B – Gather information and views on the supply of and demand for provision
- STAGE C – Assess the supply and demand information and views
- STAGE D – Develop the strategy
- STAGE E – Deliver the strategy and keep it robust and up to date

- 3.2 This guidance has been followed in production of the East Devon PPS and we have also drawn on the work and content of the existing PPS. We will also draw on strategies of sport governing bodies in our work.
- 3.3 We have reached a point where Stages A, B and C (above) are nearing completion. We have, therefore, developed a very good understanding of the pitch and tennis court supply and quality issues across East Devon, clubs and teams that are using pitches, demands that are placed on them and views of sports clubs and governing bodies.
- 3.4 We do not have agreement and ‘sign-off’ from the sport’s governing bodies on completion of Stages A, B and C, and the iterative nature of the PPS work is such that these stages of work may be reviewed and updated as other work, Stages D and E, progress. We do have, however, a robust body of evidence. As such we can now tentatively consider approaches to strategy development and delivery (Stages D to E).
- 3.5 We would highlight that Stages D and E will need a body of work for completions but from an East Devon District Council officer perspective and understanding there is an emerging picture that we can present and this is set out in Appendix 1 to this committee report that will help with these stages. Please note that Appendix 1 refers to terms and matters addressed throughout this report and as such should be read in the context of full report content.

4. Developing the strategy and delivery (Stages D and E)

- 4.1 The Sports England guidance on PPS production is clear that the development of the strategy (Stage D), which specifically includes “*developing recommendations and (an) action plan*” needs to be undertaken in conjunction and agreement with sport governing bodies. The PPS should be a document that has a wide level of support and agreement and critically it needs to adopt a partnership approach to agreed actions if it is to be supported, successful and lead to implementation.

- 4.2 Part of the partnership approach, if the PPS is to be meaningful, also needs to support active involvement of East Devon District Council and this points towards differing services and departments of the Council agreeing to and 'buying into' recommendations and actions.
- 4.3 The district Council owns and manages many of the pitches across East Devon, though many are also owned, managed or operated by sports clubs themselves, charities, parish councils and in some cases private bodies or other institutions or organisations. It is stressed that the PPS is not just about District Council assets and operations, far from it, the PPS is concerned about the provision of pitches that provide public and community access regardless of who runs or operates them.
- 4.4 Part of the work, therefore, on strategy development will involve consideration of the 'ownership' (in its broadest definition) of pitches and their overall improvement and enhancement.
- 4.5 The Sports England guidance on PPS production provides very clear guidance in respect of three key terms when it comes to development and implementation of the strategy, these are:
- Protect
 - Enhance, and
 - Provide.
- 4.6 These terms are referenced throughout the Sport England Guidance (see for example pages 47 to 49 of their guidance). These terms are expanded on in the report sections below with specific commentary around district council responsibilities and general issues, understandings and challenges emerging from the PPS work to date.

5. Protect - Protection of existing pitches

- 5.1 Protection can be looked upon as not losing the sports pitches that we have now in the district. The sport England guidance (para D6) states of *".....the need to protect playing pitch provision irrespective of ownership and the degree of community access and use, along with unused sites and land allocated as a playing field in any relevant development plan document."*
- 5.2 The protect element falls very much within the planning remit and role of the council. Across England, and looking back over recent decades, there has been significant accounts of reporting of playing fields being sold on and used for development, often house building, without suitable replacement. Government policy has significantly tightened in respect of this challenge and policy provision on protecting loss of sports pitches is set out in existing and emerging local plan policy.
- 5.3 In East Devon we are aware that some losses of sports pitches have historically occurred. Where possible losses would result from development being proposed the Council has robust planning policy in place to resist such loss with policy provision to seek replacement provision or equivalent where development may otherwise be

appropriate. The very rare exception to this rule would be in exceptional cases where it can be demonstrated that an over-provision of pitches may exist in a locality.

- 5.4 From the PPS work undertaken to date (Stages A to C) we do not see, however, evidence that there is any kind of picture or pattern of over-provision (any exceptions would therefore be very rare and unusual). In all of our towns, in particular, assessment presents a general picture of pitches (including taking match play and training into account) being in very high demand and frequently they are 'over-played'. Feedback received advises of clubs finding significant challenges in finding pitches to play on and in many cases clubs report of inadequate facilities inhibiting the formation of new teams and therefore limiting the ability of people to participate in sport – this is especially so female participation.
- 5.5 In rural areas and villages the demand picture can vary slightly from towns. Levels of pitch provision vary from some village locations that do not have any facilities, others that may have little (perhaps a single cricket or football pitch) through to a few villages that are well supplied (in quantity terms at least) with pitches. In this later case Feniton is a good example of a village with good sports facilities, specifically for football and cricket, that serve a local and wider need.
- 5.6 A non-development form of 'loss' with cases highlighted in the draft PPS is where a landowner or manager cease to manage land for sports pitch use or ceases to make it available for community use or activity. The draft PPS reports on some cases where there may arguably be an over-supply consideration, a possible example being at Clyst Hydon where there were historically two cricket pitches but assessment work indicates one is no longer being maintained, this is a case where it is assumed that the local community does not generate sufficient demand to warrant maintaining two pitches.
- 5.7 There are, however, cases where landowners will cease to lease, rent or allow community use of land and pitches that they control. Where there is no need for planning permission, i.e. development is not proposed or occurring, there are typically very few direct intervention powers that can be exercised to stop such losses occurring. But where this happens, and particularly at extremes, it can have significant impacts on availability of pitches in some localities.

6. Enhance – enhancement of the pitches that already exist

- 6.1 Enhancement is about improving the facilities we have and how they are managed. The Sport England Guidance (para D8) states “... *recommendations and actions should look to make the best use of existing provision ensuring better quality, access and management.*”
- 6.2 From a District Council perspective the enhancement side falls to services and departments at the Council that are responsible for managing and maintaining sports facilities and operating services that lease or rent pitches or courts that provide for community access. This side of matters most naturally falls to pitches that are owned by the Council or over which the Council has some form of lease or management role.

However, there may be (greater) potential for the Council to look at partnership arrangements more fully with third parties in respect of enhancement works irrespective of ownership or control.

- 6.3 In respect of pitches overall it is critical, however, to reiterate that many pitches are not owned or controlled by the District Council. Often such pitches will be maintained and managed to very high standards by dedicated staff with limited resources.
- 6.4 Challenges around the enhancement of pitches are of fundamental concern. The PPS work to date clearly shows that many pitches are played on and used for training purposes to levels that are at and beyond carrying capacities. Overuse problems are most pronounced in wet winter months when pitches can become unplayable and matches need to be cancelled or postponed. Though disruption of cricket tells us that it's not just a winter problem.
- 6.5 Enhancement of pitches through differing and better maintenance and management can go some way towards accommodating and allowing for more use. However, such works can be expensive and from a straight commercial perspective costs involved may significantly exceed financial returns resulting, for example from any scope for extra pitch rentals.
- 6.6 In respect of pitch use and impacts we specifically mention training because competitive match play alone may not result in degrees of use or overuse that necessarily warrant significant enhancement activity. The PPS assessment work suggests that on the basis of match play alone most pitches are not overused, notwithstanding the fact that under more severe weather conditions just about any pitch can become unplayable. But clubs and teams do need to train and often it will be the pitches they play matches on that form the only (or at least an important) venue for training to take place. It can be the cumulative impact of match play and training that is critical to overuse. Feedback indicates that many clubs struggle to find suitable training venues.

7. Provide – Provision of new sports pitches and facilities

- 7.1 Providing is about new and extra pitch delivery. The Sport England guidance (para D10) advises that PPS work “..... *may suggest that alongside the enhancement of existing provision new natural and/or artificial grass pitches are required to meet current and/or future demand.*”
- 7.2 In respect to provision of pitches alongside new development (for example big new housing schemes) the planning service of the Council has a direct role. But where provision is about addressing shortfalls that may exist at present the role of who may or should lead on delivery from the District Council may fall across varying departments. There is not, however, currently an overall lead department at the Council with this remit, nor one therefore, that coordinates such Council activities. The departments that this work does touch on such as Property and Estates and Leisure do not have sufficient resources in either staff or capital funding to undertake this work at present.

- 7.3 The PPS work to date, noting a clear picture of need and under-provision in many locations, and limitations on the degree to which existing pitch enhancement would address shortfalls, demonstrates a demand and need for new pitches. This is no real surprise and it was a concern highlighted in the previous PPS dating back to 2015. But providing new pitches is a significant challenge. Amongst concerns we would highlight are:
- a) **Costs** – new pitches can be expensive to provide – costs add up taking into account land acquisition, gaining permissions/authority to develop, facilitating and engineering works, laying out pitches, providing ancillary and supporting facilities, etc and then there are running costs. And
 - b) **Identifying suitable locations** – from a planning and development perspective there is a shortage of land that easily and naturally lends itself to new pitch provision. Much of East Devon is hilly and as such not great for sports that need flat pitches and also much land is of high environmental, heritage or other sensitivity to development (including for sports pitches).
- 7.4 Whilst planning permission is required for any new sports pitch provision; delivery is often most readily achieved where larger scale strategic development is proposed or is occurring. Through legal powers (specifically Section 106 agreements) we can negotiate provision of new facilities alongside development where that development is of a scale or kind that generates sufficient need to warrant the extra provision.
- 7.5 At Cranbrook, as an extreme case for East Devon, where large scale housing development is occurring there has been and will be delivery of new sports pitches and (ideally) these should be proportionate in scale to meet the needs generated by the growing population of the new town. Though an important planning matter to highlight is that legal agreements in respect of planning permissions granted cannot address matters of need that are **not** generated by the development in question. Essentially we can't grant a planning permission for a development and 'in return' seek provision to address an existing under provision of facilities.
- 7.6 Rather than provision on big development sites, what can be far more challenging, in so far as planning powers go, is addressing the cumulative need for extra sports facilities that lots of small-scale new developments might generate. Schemes for a few new houses 'here and there' will individually generate minimal need but collectively they may generate a need that is substantive. Whilst the collection of Community Infrastructure Levy money can open potential to generate funds that can be used for new pitch provision there are competing demands on what is a finite pot of monies and also there are challenges more broadly around securing actual delivery.
- 7.7 We would highlight that the expectation may be that the final PPS will point towards the need for bespoke assessment work being needed to determine appropriate levels of pitch provision at the second new community in East Devon.

8. The role and relevance of Artificial Grass Pitches and surface

- 8.1 To date much of this report relates directly to issues and considerations specifically or mostly relevant to grass pitches. It is important, however, to highlight the importance of artificial surfaces (i.e. non-grass surfaces) for outdoor sports use. Artificial Grass Pitches (AGPs), sometimes referred to as Artificial Turf Pitches (or ATPs), play a very significant and increasingly important role in playing pitch provision and use.
- 8.2 AGPs mimic grass surfaces and have seen significant improvements over the years, with new technologies and pitch types being developed. The PPS work records that there are 11 AGPs in East Devon, though pitches at Bicton College, Exeter City Football Club Cliff Hill Training Ground and the Commando training centre at Lypstone have limited or nil community use accessibility. The other AGPs in East Devon are located at or next to school sites and provide mixed school and community use – as such they also have some limitations on community availability.
- 8.3 AGPs are also referenced in the Council's Leisure Strategy and Built Facilities Strategy but we include them in the PPS, as well, as they are of significance for outdoor pitch-based sports use (especially so for training). An important consideration to be aware of in respect of AGPs is that they come in differing forms, primarily determined by pile length (the rough equivalent to how short or long a grass may be cut to on a grass pitch) and also the dressing type used (the material that sits around and underneath the pile).
- 8.4 Differing AGP surface types have differing suitability for different sports. All competitive hockey matches are now played on AGPs, though only short pile surfaces are suitable. Competitive hockey in East Devon is played on AGPs in Sidmouth and Ottery St Mary. On a compromise basis, and up to certain league levels, competitive football matches can be played on short pile surfaces, but not rugby. Better for football, and essential for rugby, is the need for longer pile surfaces, though these are not acceptable for hockey. That said the PPS work shows that there are few football and no rugby teams that play their home matches on AGPs. Specifically in the case of rugby it is reported that there is a very clear resistance to the potential use of AGPs for competitive match play.
- 8.5 Other than for hockey, where the AGPs are essential for outdoor match play use, the key importance of AGPs is in respect of providing for training. All sports will seek to make use of the AGPs for training purposes (and for many training activities the surface type may be of limited importance). PPS feedback received reveals a picture of demand for AGP use by sports teams exceeding supply and availability.
- 8.6 The provision of additional AGPs offer particular potential for enhancement of sports pitch provision in East Devon. AGPs have the distinct advantage in that they do not suffer from wear and tear in the same way that grass surfaces do and as such they can accommodate much more use. However, they are expensive to install, do require some maintenance and if the desire is to floodlight them (and as such offer extended winter/dark month use) they can cause (additional) adverse neighbour and adverse environmental impacts. Also, noting that different sports require different surfaces for

match play purposes there is not a single surface that suits or is ideal for all and every sport.

9. Tennis in East Devon

- 9.1 Tennis is worthy of important mention in that it is also mostly played on artificial surfaces though these differ from the mainstream AGP surface types. The PPS records a total of 77 tennis courts in East Devon with 31 being outdoor floodlit courts, 39 outdoor unlit courts plus a further 7 being indoor courts, also with artificial lighting. A limited number are grass courts.
- 9.2 Some surfaces (and court areas) used for tennis do also support use for other sports. There are, for example, netball courts overlaying tennis courts in East Devon.

10. The further development of the PPS and the Strategy and Action Plan

- 10.1 The stages ahead in terms of PPS production and completion are identified as:
- Completion of the evidence gathering and assessment – **Stages A, B and C**
 - Developing the actual strategy – (the what is planned to be done about it element of work) - **Stage D**, and
 - Delivering the strategy and keeping it robust and up to date - **STAGE E**
- 10.2 **Stages A, B and C**, as already referenced in this report, are nearing completion. Subject to data and information refinement (with limited extra information gathering), referencing the extra material in the appended draft report, and potentially information challenge and verification, it would be expected that this stage of work will be completed at around Easter time.
- 10.3 **With respect to Stage D** of the work it is important to reiterate that the PPS should have wide ranging ownership and endorsement, as such and as a minimum (outside of East Devon District Council inputs and endorsement) this should include inputs from, consideration by and approval of the sports governing bodies.
- 10.4 The intention is that there will be ongoing work with the sport governing bodies over the coming weeks leading to conclusions around their inputs later in the Spring/by early Summer.
- 10.5 This leaves a question, however, around if or how East Devon District Council, at both a wider officer and Member level wishes to or should be involved with the strategy aspect of PPS production. One option would be to simply report back to committee on conclusions reached by the Sport Governing Bodies, through discussions with Planning Policy officers at the Council. This work would (or could) then come to committee with a recommendation that conclusions reached are endorsed and the PPS should be endorsed and approved/adopted.
- 10.6 However, members of the council may wish to be (more) active or pro-active in respect of the strategy side of production and be more directly involved in shaping and

forming the strategy that is finally to be agreed. Should this be the view of Members, or committee, then it would be desirable for any debate to be shaped around the form that such involvement should take (notwithstanding the fact that members should not lose sight of the need for sport governing body endorsement and active involvement). Members of committee may be aware of the role that the LED Monitoring Forum has played in helping to shape aspects of Leisure Strategy planning and as such may see this or a similar body or grouping as a way to further the strategy aspect of the PPS.

- 10.7 Whatever approach that committee may favour in respect of member input to PPS work there is a need to consider overall timetables. The PPS has taken longer to get to this stage than would be desirable. Work started pre-covid but the pandemic put things on hold, we have then made solid but slow progress since. The aspirations is, however, to draw to conclusions in a timely manner, this should certainly be before the end of summer 2024 and ideally would be early summer. We need the PPS in place to support the local plan through plan Examination.
- 10.8 **With respect to Stage E** - Delivering the strategy and keeping it robust and up to date, this very much relates to a report that the Assistant Director for Leisure at the Council is planning to take to Cabinet on the 27 March 2024. In this report issues of overall delivery of leisure and sports services of and by the Council will be addressed in detail with options set out for how the Council may seek to go forward into the future.
- 10.9 It is important to note that the previous Playing Pitch Strategy and associated Exmouth Sports Pitch Strategy and Honiton Sports Pitch Strategy all identified significant projects to enhance provision across the district. These strategies are available at: [Open Space – Playing Pitch Strategy – East Devon](#).
- 10.10 In recommending these strategies to Members for adoption, in 2015 in the case of the Playing Pitch Strategy and 2016 and 2017 for the Exmouth and Honiton specific strategies, the need for additional resources to help deliver these strategies was highlighted. It was always envisaged that the council would play a facilitating role in the delivery of the Playing Pitch Strategy. This would be done in partnership with sports bodies and clubs through co-ordinating funding bids, negotiating with landowners and assisting with land acquisition and project delivery. Unfortunately, resources were not found to undertake this work and so the actions of the previous strategies remain undelivered. This has caused some frustration in recent times particularly in Honiton and officers are concerned about developing a further strategy to address these issues and the additional needs arising from the new strategy without clarity about the role that Members see the Council playing and the resources that would be committed to aid its delivery.
- 10.11 The new strategy needs to be deliverable, however it is acknowledged that this is not a statutory area of work and given budget constraints the Council could legitimately say that the resources needed simply do not exist. From a planning perspective it also important to note that previous work highlights how land constraints particularly in Honiton and Exmouth mean that there are no easy solutions and in some cases there may be no solutions to some of the issues highlighted. Involvement in sport and increasing activity levels generally is however vitally important to the health and

wellbeing of residents. With all of this in mind Members are asked to make a recommendation to Cabinet that consideration be given to the role that the Council wishes to take in the delivery and enhancement of playing pitches in the district and the resourcing of this work. Once officers have clarity on these matters then a strategy for addressing the issues highlighted in the work so far can be produced ensuring that the Council's role is made clear and the strategy is deliverable.

- 10.12 The PPS itself, after adoption, will need to be regularly updated. PPSs are deemed to be out of date three years after approval and as such, and over time, any PPS will carry diminishing weight and importance. Any debate on future update of the PPS and much more importantly issues about its use and implementation should, however, fall to Cabinet deliberation later in March 2024 and actions arising thereafter.

Financial implications:

There are no direct financial implication resulting from the report, however the implementation of the strategy could have financial implication the council must consider.

Legal implications:

There are no direct legal implications resulting from the report.

Appendix 1 – an emerging picture of sports pitch needs in East Devon

In this appendix we present an overview of emerging evidence on Sports Pitch needs in East Devon drawn from the draft Playing Pitch Strategy work to date. It should be stressed that this assessment is initial work only, it has been undertaken by officers of East Devon District Council and has not been discussed with nor agreed with Sport England or sport governing bodies or any other organisations. However, it does provide a guide to the demands that we in East Devon face. The 'we' reference does and can mean East Devon District Council and the Council actions but also it is a wider reference that will include Sport England, sport governing bodies, sports clubs themselves and anyone else with an interest in or responsibility for sports pitches.

The protection of existing pitches

The assessment work undertaken shows minimal evidence of an oversupply in any locality of sports pitches. The only possible exceptions are in more remote locations where there may be very good provision for a particular sport, perhaps multiple pitches where a local and wider catchment population would not fully justify such provision. Therefore, there should be a general presumption that existing sports pitches, and areas of land that may have been used for sports in the past, even though not currently used or available, should be protected from loss to alternative uses. The exception would be where loss, for example to built development, will be offset by new provision of at least an equal but preferable better quality and serving the need in its locality.

Seeking to avoid the loss of pitches where planning applications are proposing development does not typically place an additional financial burden on the Council. Rather work would typically be absorbed into regular running costs of the planning service. Though sometimes additional work is required or specialist advice may need to be bought in. What can be more challenging, however, is where the loss is a product of a landowner or manager not maintaining an area of land for sports use or excluding the public from using it. There are a number of former pitches in East Devon where this is the case and intervention actions seeking to return them into public use and accessibility could become very expensive.

The enhancement of existing pitches

The work on the PPS has recorded wide ranging concerns around the quality of existing pitches across East Devon. In dry and mild conditions pitches will frequently look good and function well but in wet winter conditions even the best of pitches can suffer very badly from use and become unplayable. The standard of pitches has been assessed through PPS work and this standard informs ability to accommodate use.

Of the 70 football pitches categorised through assessment 33% were classed as Good, 54% Standard and 13% Poor. Improving pitch quality, through enhancement work, offers scope to accommodate many more matches and whilst just about all pitches might benefit from some enhancements actions to raise the grading of many of the 67% that were graded Standard or Poor could open up potential for more use – both match play and for training. Cricket pitches

tended to be more likely to be rated Good or Standard. Rugby pitches, of which there are fewer are reported to be of variable quality.

A very common theme in engagement feedback was the overplaying of pitches. In some cases assessment suggests it may be match play alone that leads to a pattern of overplay but more typically it is a combination of match play and training that causes the most concerns (and of course exacerbated by, if not directly resulting from, wet weather).

We have not sought to quantify how much could be spent on sports pitch enhancement but if money were no object it's clear that it could run into hundreds of thousands of pounds. Facilities at sites are also of variable quality with lack of provision of facilities such as toilets, holding back activity levels.

The provision of new pitches

The PPS work shows that there are areas where there is such a shortage of pitches that enhancement work alone is very unlikely to address needs and as such new or extra provision is a logical step, assuming the aspiration is to seek to meet needs. One of the fundamental challenges is that matches are frequently played at the weekends, junior football matches for example most typically on Saturday mornings and adult matches on Saturday afternoons. Whilst some pitches may have spare carrying capacity spread across the whole week to accommodate more matches they can only be used for one match at a time and it's at the weekend, especially Saturdays, when demand peaks. It is at such times where the number of existing (or more importantly potential teams) wanting to play at the same time can exceed the pitches that exists.

Part of the solution to pitch deficiency can be the provision of new pitches. But finding suitable sites can be challenging and actually building them can be very expensive. There is a general picture of demand for new pitches in East Devon towns. In rural areas needs are more difficult to quantify and qualify and in some cases some villages have good facilities and even some smaller villages can be very well supplied (in quantity of pitch terms if not necessarily quality).

The rest of this appendix concentrates on need and demand issues specifically the main East Devon Towns.

Demand for pitches by town location

Bearing in mind enhancement and especially provision considerations we set out below an initial indicative review of pitch provision considerations by town location.

Axminster	
AGP	There is an AGP in Axminster that is not used for match play but is heavily used for training sessions by football clubs, from within the town and beyond. Feedback reports on challenges in finding suitable training slots to book. The AGP is not suitable for hockey and there are no clubs in the town or close by.

Football pitches	There are two sets of grass football pitches in use in Axminster - Cloakham Lawns and Axminster Town pitches. The former may have possible capacity for some extra use, the latter has pitches that assessment shows (especially taking any training use into account) are over-played. Axminster Town have an area at their site for a new small format pitch but have not built this. Provision would alleviate pressure to some degree on the pitches, but any new pitch would be costly to provide.
Rugby pitches	There are no rugby pitches or clubs in the town. Feedback suggests that it is very unlikely that new rugby clubs will form. No pitch need is therefore identified.
Cricket pitches	There is one cricket pitch at Cloakham Lawns and space (now used for football) where a second pitch used to exist. The one pitch was categorised as Standard quality but it does accommodate a number of teams. Given that a second pitch is not maintained it is assumed unlikely that quantified demand for extra pitches exists.
Tennis courts	There are two tennis courts at the LED Leisure centre. Compared to other towns this level of provision is low and there is potential need for extra court provision.
General observations	Generally, Axminster would appear reasonably well provided for sports pitches. The AGP provides for club training though with feedback of over-use/challenges for booking, with pressure from clubs using the facility from surrounding areas.

Budleigh Salterton	
AGP	There is no AGP in Budleigh Salterton. No doubt provision would offer use opportunities, though AGPs at Exmouth and Bicton College are relatively close.
Football pitches	One adult and two junior pitches, at Budleigh Salterton FC, provide for football in the town. From just match play use the adult pitch is at or beyond use capacity and any extra training use will worsen problems. It is likely that there is a case for some additional football pitch provision in the town.
Rugby pitches	There are no rugby pitches or clubs in the town. Feedback suggests that it is very unlikely that new rugby clubs will form. No pitch need is therefore identified. There are two clubs in nearby Exmouth.
Cricket pitches	There are two new cricket pitches in Budleigh Salterton that support a large number of teams. In quantity pitch terms provision is good but there are some supporting facility deficits and pitch quality is not yet established.
Tennis courts	Budleigh Salterton Games Club (Tennis Section) provides a large number of courts in the town.
General observations	For a small town Budleigh Salterton appear reasonably well supplied with pitches. Additional (or at least enhanced) football pitch provision would be likely to be looked upon favourably with pressure on existing facilities, but for others sports, specifically cricket and tennis, overall provision is good.

Exmouth	
AGP	There is full size AGP and a junior size AGP in Exmouth. The full size AGP is suitable for hockey match play but there are no East Devon based teams using the facility (two Exeter based teams make some use). The pitches are widely used and in demand for training use and some junior football match play. The Football Foundation have identified Exmouth as a priority location for new AGP provision, recommending the replacement of a grass football pitch at Exmouth United with a new AGP.
Football pitches	There are a range of football pitches and Ex Dons have one team playing in the town. The only other club supporting adult teams in in the town is Exmouth United – though they do support a large number of teams at adult and also junior level. In addition Brixington Blues also support a large number of youth teams. A range of pitch sites are used by Exmouth clubs with some teams travelling out of the towns to other locations for match play. Given the size of the town football pitch provision is low and it is of some surprise that the town supports only one significant club with adult teams. The Warren View site would appear to be significantly over played, other sites and pitches potentially less so. New pitches should be available in the near future at the former Rolle College, but these will still leave a deficient in pitch availability. There is a strong case for extra football pitch provision in Exmouth.
Rugby pitches	There are two rugby clubs in Exmouth. They both support a range of adult and junior teams, but do so on just three adult sized and one junior sized pitch. The rugby pitches do not have sufficient capacity for training nor for match play and all are overplayed. Match play overuse being exacerbated by training use. A clear pitch deficient is identified in the town with both clubs having a case for extra pitch provision.
Cricket pitches	For a town of its size it is perhaps somewhat surprising that Exmouth is home to just one cricket pitch. But pitch assessment reports a high-quality facility and it supports a large number of adult and junior teams. The fact that there is only one pitch in Exmouth may suggest a pitch deficient, given the size of the town, but we do not have direct feedback calling for or seeking more provision.
Tennis courts	There are a range if indoor and outdoor tennis courts in Exmouth at various sites. We do not have information that may indicate that there is an unmet demand.
General observations	Exmouth has real pressure on sports pitches specifically including for football and rugby. Grass pitch numbers in the town are low compared to the population size with real pressure on the pitches that do exist and clear evidence of use on a number of pitches exceeding reasonable carrying capacity. It is the East Devon town that would appear to see the greatest need for extra pitch provision. A new AGP would alleviate pressures to some degree but it is not clear whether overall it would be sufficient to address need, especially so given that football and rugby have pitch deficits.

Honiton	
AGP	There is currently no AGP in Honiton though the Football Foundation have identified Honiton as a priority location for new AGP provision. There is an overall demand for sports pitches in Honiton, from football, rugby and hockey, that would justify provision but no single surface type would suit all sports for higher standard match play purposes. There is one hockey club based in Honiton who play home matches in Ottery St Mary and have previously raised concerns about not having facilities in the town. We are also aware of demands for football use and might expect the rugby club, should a facility be available, seeking to use it for training purposes.
Football pitches	Honiton Town adult FC support two teams playing on 2 adult pitches, overmarking the cricket pitch at Mountbatten Park Sports & Social Club. Drainage concerns are highlighted in survey work on what are recorded as Standard quality pitches. Match play does not exceed capacity but demands for training on the pitches are unknown. Honiton Town Youth are recorded as supporting 13 teams playing at St Rita's on what were recorded as three marked out pitches – two recorded to be of Standard quality and one Poor (though there may have been four in past seasons). The club advise of insufficient capacity to accommodate the number of teams/players that would want to play and also advise of lack of facilities, with this adversely impacting on girl participation.
Rugby pitches	There is one rugby club in Honiton playing with a large number of teams on two pitches in the town. The pitches have insufficient capacity to accommodate training needs of the club (and they have marginal capacity to accommodate the full match play needs). Taking into account match play and training the pitches are understood to be overplayed. Drainage concerns have been identified as a particular problem and concerns have been raised around quality of changing rooms.
Cricket pitches	Honiton Cricket club support five teams playing at the Mountbatten Park Sports & Social Club. The cricket outfield is overlaid by two football pitches and as well as this causing pitch quality concerns there can be scheduling conflicts from overlapping seasons of play. Pitch quality was assessed as being Good.
Tennis courts	There are two outdoor tennis courts in Honiton at the LED leisure centre, these are overmarket by netball courts. We do not have information that may indicate that there is an unmet demand though compared to other towns, given the size of Honiton, court numbers are low.
General observations	Honiton has been identified as having a pressure for youth football pitch provision and it also noted that the rugby pitches are overplayed with a particular lack of capacity for training use. There is a Honiton hockey club but they have no AGP to play on in the town.

Ottery St Mary	
AGP	There is one AGP in Ottery St Mary located at the Kings School/LED leisure centre. This AGP is used by both of the two Hockey Clubs located in East Devon, for both match play and training. It is also reported to be heavily used by other sports clubs, notably football teams, for training purposes.
Football pitches	Ottery St Mary Football Club supports 16 teams at youth and adult level all playing home matches on two adult and two junior pitches at Washbrook Meadows. Adult pitches are reported to be of a good standard. There is potentially some limited spare capacity from match play use but this would not take into account any use and impacts arising from training.
Rugby pitches	There are no rugby clubs in Ottery St Mary.
Cricket pitches	Ottery St Mary Cricket Club supports 14 teams playing at what is reported as a busy ground of good quality.
Tennis courts	There are five recorded outdoor tennis courts in Ottery St Mary. We do not have information that would indicate that there is any an unmet demand.
General observations	Ottery St Mary supports a wide range of sports and clubs on a decent supply of sports pitches and courts.

Seaton	
AGP	There is no AGP in Seaton but there is one at the nearby Colyton Grammar School LED site. The Colyton LED is suitable for hockey use but supports no hockey clubs. The AGP is, however, used by a range of other sports clubs for training purposes. The Football Foundation have identified the Seaton/Sidmouth area as a priority location for new small sized AGP provision.
Football pitches	Seaton Town FC support three adult teams and a youth team playing at the single pitch Colyford Road site. This was recorded as a good pitch but with tight margins. Match play at the pitch is close to capacity and any training use may well result in a pitch that is overplayed. The club also support a further seven youth teams playing at a single pitch site at Elizabeth Road Recreation Ground.
Rugby pitches	There are no rugby clubs in Seaton.
Cricket pitches	Seaton Cricket and Lawn Tennis Club at Court Lane have a pitch that was rated as good though is playing at close to capacity. The club supports an impressive 13 teams at adult and junior levels at this site.
Tennis courts	There are eight tennis courts in Seaton. We do not have information to indicate that there is an unmet demand and this is a comparatively high level of provision at the town compared to other towns.
General observations	Seaton would appear poorly provided for in respect of football pitches but tennis court provision is high, the cricket pitch is of good quality and the Colyton AGP is relatively close by, but heavily booked.

Sidmouth	
AGP	There is one AGP in Sidmouth that is suitable for and extensively used for club hockey matches. The AGP supports training use for other sports. It is not floodlit but there have been past proposals for floodlighting. See also comments in respect of Seaton and small size additional AGP.
Football pitches	Sidmouth Town Football Club supports 19 teams at adult and youth level. They play on a range of pitches in Sidmouth and Sidford with adult games played at the Manstone Recreation Ground pitch which is rated as Good, based just on match play it would appear to have some spare capacity. Youth teams play at Byes Lane pitches at Sidford, St John's International School and at the relatively close by settlement of Newton Poppleford, at Back Lane. Balls Sport FC also play at Byes Lane and the football pitches here would appear to offer some spare capacity for match play use.
Rugby pitches	Sidmouth Rugby Football Club supports 17 teams at adult and youth level. The Blackmore forms the main town centre pitch used by the club and they also use two pitches Byes Lane in Sidford. The Sidford pitches are overplayed for match use and these and The Blackmore will be exacerbated by any training demands. Pitch maintenance and storage have been highlighted as concerns. It should be noted that there is a third rugby pitch at Sidford but there is no record of the levels of use made of this.
Cricket pitches	Sidmouth Cricket Club support 17 cricket clubs at adult and youth levels. They play at the Sidmouth Cricket Club Field that is rated as good.
Tennis courts	Sidmouth (including Sidford) has 13 tennis courts which is a high number compared to other towns. We do not have information on unmet need and given levels of provision this would appear unlikely.
General observations	Sidmouth (including Sidford) has good overall sports facilities. As with other towns supporting rugby clubs there is pressure on pitches but Sidmouth has more pitches than other locations. The cricket pitch is well used and there is very good tennis court provision. It is a town, however, where the football team travels out of town for some youth football matches.

It should be noted that at Cranbrook pitch delivery is occurring alongside new development and in this Appendix provision and use levels are not specifically commented on. There will need to be bespoke work undertaken for the second new community that is planned for East Devon.