

## Agenda for Strategic Planning Committee Tuesday, 2nd April, 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)

Wednesday, 20 March 2024



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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 - 16)  
Minutes of previous meetings held on 5 March and 12 March 2024.
- 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 Potential for designation of a Green Belt in the West End of East Devon (Pages 17 - 27)  
The report provides commentary around the options for exploring a Green Belt designation in the West End highlighting that, from officer review, it would be inappropriate to seek to pursue the option of Green Belt designation.

8 Clyst Valley and New Communities Local Cycling and Walking Infrastructure Plan (LCWIP) (Pages 28 - 35)

The report sets out a proposed response by this Council to Devon County Council's consultation.

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[Decision making and equalities](#)

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**EAST DEVON DISTRICT COUNCIL****Minutes of the meeting of Strategic Planning Committee held at Council Chamber, Blackdown House, Honiton on 5 March 2024****Attendance list at end of document**

The meeting started at 10.00 am and ended at 1.20 pm. A brief adjournment took place at 11.57 am reconvening at 12.13 pm.

**69 Minutes of the previous meeting**

The minutes of the Strategic Planning Committee held on 13 February 2024 were confirmed as a true record.

**70 Declarations of interest**

There were no declarations of interests.

**71 Public speaking**

There were no members of the public that wished to speak.

**72 Matters of urgency**

There were no matters of urgency.

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

There were no confidential or exempt items.

**74 Local Plan Timetable Update Report**

The Committee considered the Assistant Director – Planning Strategy and Development Management's report that gave an update on the local plan making progress which was currently behind schedule by two weeks to take into account the Green Wedge Workshop that Members agreed at the meeting in February.

Members noted that the addendum Regulation 18 consultation would now be launched after the Strategic Planning Committee meeting on 2 April which would allow for any further work to be completed.

The Assistant Director – Planning Strategy and Development Management sought Members guidance to the preferred approach to the consultation and whether they wished officers to encourage responses through the Commonplace software or by other means of engagement such as the council's website, newsletters, webinars with town and parish councils or direct engagement with officers.

Members guidance was also sought on the climate change chapter of the Local Plan. The Assistant Director – Planning Strategy and Development Management referred to the recent Government actions to control building standards through Building Regulations and sought guidance about whether members would prefer to follow Government's guidance or remain with the zero carbon approach which would require

further work to be completed to gather evidence to promote this as a key policy in the Local Plan.

Points raised during discussion included:

- Will there be village hall drop in events again and have lessons been learned from the last consultation? The Assistant Director – Planning Strategy and Development Management sought clarity from Members about what they wanted to do as it was noted in the report that face-to-face engagement had received a mixed response with an expectation that more information would have been provided than was available on-line. He suggested that due to the limited scope of the consultation there was limited need for face-to-face engagement but suggested if required, that officers would be happy to provide town and parish councils with materials needed if they wanted to hold their own event.
- Disappointment was expressed about the Government actions on climate change as it is important to ensure houses are being built to the best possible standard. How can this be achieved if the policy is not in the new Local Plan. The Assistant Director – Planning Strategy and Development Management acknowledged the need to deliver low carbon developments and sought clarity from Members about how far they wanted to push against Government which in turn could jeopardise the Local Plan at examination.
- Clarity was sought on what the consultation would focus on. The following list was confirmed:
  - Additional housing sites
  - Green Wedges
  - Additional employment sites
  - Boundaries for Coastal Preservation Areas
  - Boundaries for Clyst Valley Regional Park
  - Town Centre Policies
- Reference was made to Devolution and having the right homes in the right places and whether this would have an impact on the new Local Plan.
- Clarification was sought on whether a response had been submitted to the consultation of the Future Homes Standard and whether the letter had been signed to the Town and Country Planning Association letter. The Assistant Director – Planning Strategy and Development Management confirmed that these were urgent items to do.
- There is a need to put pressure on developers to build zero carbon homes.
- Preference was expressed for a zero carbon policy.
- To build zero carbon homes would add extra costs for developers which would raise the prices of homes and make them unaffordable for people on low incomes.
- Agree that in principle we should be building zero carbon homes but in reality this will be difficult until everyone is working to the same standard and for Building Regulations to be done on a national basis.
- It was suggested that the consultation could be sent to every household in East Devon by putting a QR code on a tag which could be left on the refuse bin after they are emptied.
- It was suggested to amend Recommendation 3 to read:  
'To request that officers undertake the necessary work to robustly defend the approach to zero carbon development contained within Strategy 28 of the Regulation 18 Local Plan and the work on suitable areas for wind energy contained in the proposed Strategy 31'. In response the Planning Solicitor advised that the generalised wording in Recommendation 3 would allow officers more flexibility and suggested a slightly amended version:

'That Committee 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.

Councillor Mike Howe proposed Recommendation 1 and 2 as written and the amended Recommendation 3 as suggested by the Planning Solicitor. This was seconded by Councillor Todd Olive.

**RESOLVED:**

1. The ongoing work on local plan production as summarised in the update report be noted.
2. The proposed approach to additional local plan consultation in April and May be agreed.
3. That Committee 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.

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**Consultation on Housing Sites**

The Committee considered the Assistant Director – Planning Strategy and Development Management's update report which proposed 13 additional housing sites, subject to the Regulation 18 consultation, to be included in the new Local Plan. Members noted that following officer assessment it was proposed that six sites were preferred site allocations, six sites were rejected, and the final site was a second choice site. A summary of these sites was detailed in the table at paragraph 2.3.

The Assistant Director – Planning Strategy and Development Management sought delegated authority to make some necessary changes to an amendment for assessment for site Brcl\_31 – Land at Mosshayne Lane, Pinhoe. Officers had been recently advised that the joint landowner who owns part of the south eastern side of the site did not want that to be part of the consultation and that it should be removed from the new Local Plan. Members noted that this reduction in size would require a modest reduction in housing numbers.

Points raised during discussion included:

- Clarification was sought on the number of houses that would be lost at Land at Mosshayne Lane, Pinhoe. The Assistant Director – Planning Strategy and Development Management advised that the housing numbers would need to be reassessed and acknowledged this would have an impact on the numbers.
- Reference was made that the Mosshayne Lane site was urban sprawl and it was questioned whether this site should be allowed so close to the edge of Exeter. It was advised this land and other land proposed were sustainable due to their proximity to Exeter and are seen as strategic growth on the edge of the city.
- A general point was made that the sites proposed were clustered around built up areas and all rural areas had been rejected because of constraints. It needs to be acknowledged that the council is aware of the housing needs in villages and the countryside. In response the Vice Chair advised that rural parishes need to get a neighbourhood plan which would identify what development communities would like delivered.
- Clarification was sought on paragraph 2.1 and the 38 additional housing sites and whether these had been submitted by a third party as only one garage in Millwey Rise site had been identified out of the five garage sites. It was advised these

could possibly come through as windfall sites as these would be small sites of less than 5 houses.

- Reference to Axmi\_17 – land at Millwey, Chard Road (EDDC land) and clarification was sought as to whether this was submitted by an officer or a third party as there appears to be inconsistencies in the shifting of sites. These details were not to hand but the Assistant Director – Planning Strategy and Development Management advised land was usually put forward by the landowner.
- The site details for land at Mosshayne Lane has the address as Pinhoe, this is incorrect as it is in Broadclyst.
- There is a need to consider the benefits of development but policies do not permit this. Do policies outweigh benefits through the Localism Act.
- Axmi\_24 – land west of Prestalier Farm, Beavor Lane, Axminster – this area has a risk of flooding and should not be included in the site allocation.
- It was suggested that the Mosshayne Site should have a Green Belt or a Green Wedge to stop the coalescence between Exeter and East Devon.

Councillor Dan Ledger proposed the recommendation as written with an additional recommendation as follows which was seconded by Councillor Mike Howe: 'That EDDC's Housing Service and Assets Service take a further look into all of the council's available sites and provide a final list of sites for the Assistant Director – Planning Strategy and Development Management, Chair and Vice Chair to consider for inclusion in the consultation. Delegated authority to also be given to the Assistant Director – Planning Strategy and Development Management, in consultation with the Chair and Vice Chair, to amend any site allocations if deemed unsuitable due to flood risks or other factors'. Councillor Ledger also asked for all committee members be sent a completed list of the sites that have been rejected explaining at what point the rejection took place and for what reason.

Councillor Ledger advised that a lot of changes had taken place within the Housing Department and he wanted to make sure that everything was being done to increase social housing for residents as this was one of the key council priorities and confirmed that he was comfortable if the consultation was pushed back 2-3 weeks to ensure of the necessary work had been completed.

The Assistant Director – Planning Strategy and Development Management advised he was happy to send a link to the site assessment work to Committee Members and suggested that Members contact him directly if they considered some sites previously rejected merited further assessment.

He raised concerns about going back to departments to submit further sites and reminded Members there had already been two call for sites. He urged Members to consider the implications that if more sites were to come forward there could be significant implications to the timetable which would delay the Regulation 18 Consultation which could jeopardise the Local Plan being examined under the current Regulations

#### **RESOLVED:**

1. That Committee agree to consult on the housing sites detailed in this report as part of the Regulation 18 Addendum consultation planned to start in early April subject to delegated authority to the Assistant Director – Planning Strategy and Development Management to amend the details for the BRCL1-31 to remove the section of land that the landowner is no longer promoting.

2. That Committee request EDDC's Housing Service and Assets Service to take a further look into the council's available sites and provide a final list of sites for the Assistant Director – Planning Strategy and Development Management, Chair and Vice Chair of Strategic Planning Committee to consider for inclusion in the consultation.
3. Delegated authority be given to the Assistant Director – Planning Strategy and Development Management, in consultation with the Chair and Vice Chair, to amend any site allocations if deemed unsuitable due to flood risks or other factors.

## 76 **Topic Paper relating to Town Centres, Retail and Sequential Test in the new Local Plan**

The Committee considered the Assistant Director – Planning Strategy and Development Management's report that sought Members endorsement of the topic paper on the council's approach to ensure that East Devon's eight town centres continue to thrive and meet shopping, leisure and service needs. He advised these would be included in the Regulation 18 Consultation and drew Members attention to the proposed wording to policies relating to town centres detailed on page 70 onwards.

The Assistant Director – Planning Strategy and Development Management referred to the threshold for the sequential test. This test would be applied to developments coming forward outside of town centres and would require applicants to demonstrate that their use cannot be accommodated within the town centre or closer to the town centre as this would detract from the function of the town centre itself. It was proposed to retain the current lower threshold of 500 sqm. than that detailed in the NPPF.

Comments made by Members during discussion included:

- Town centres are changing rapidly and are now becoming more of a social space.
- Reference was made to the Cranbrook Town Centre Consultation and urged caution to not raise public expectations as these cannot be met as funding was not available.
- It was questioned whether the size of town centres need to be reduced to free up areas for development.
- There is a need to look at out of town permissions such as farm shops as these could impact on town centres.
- There is a need to look at other services such as dentists and playschools.
- There is a need to look at proposals to reduce shop sizes and ensure that they remain usable.
- Empty shop buildings need to be made into residential.
- There is a need to encourage residential accommodation above shops.

### **RESOLVED:**

1. That the topic paper supporting the policies of the Local Plan set out in appendix 1 of this report be endorsed.
2. 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.

## 77 **East Devon Playing Pitch Strategy**

The Committee considered the Assistant Director – Planning Strategy and Development Management's report that updated Members on the production of the Playing Pitches Strategy and its likely outcomes with sports pitch provisions in towns.

The Assistant Director – Planning Strategy and Development Management advised that a more detailed report would be going to Cabinet on 27 March for Members to agree what role the Council should play in the delivery of the Strategy and to understand the resourcing issues before being able to move forward and finalise the Strategy.

Comments made by Members included:

- There is a clear need to progress this Strategy as the last Strategy was finalised in 2015 and since then there has been a growth in housing numbers.
- There is a lack of suitable sites and existing pitches are over played.
- There is a need for more training pitches.
- The report does not refer to the LED Monitoring Forum that had commissioned Strategic Leisure and clarification was sought about whether this had been a been considered. The Assistant Director – Planning Strategy and Development Management confirmed that close work had been done with the Assistant Director – Countryside and Leisure and his team to join up all the different services.
- Other facilities such as parking and changing rooms needs improvement and updating.
- A lot of pitches are not mentioned in the report which makes this a misleading document.
- Indoor sports pitches were not covered in the report.
- There is an opportunity for a shared service for many different clubs so that clubs can stay in the same community.
- How is the Strategy going to make a difference to villages? West Hill residents cannot share access with the school. The Assistant Director – Planning Strategy and Development Management advised that villages had not been forgotten and would be included in the final document.
- Cranbrook needs to be included in the list to help understand what will be delivered. In response it was advised Cranbrook would be included in the list.
- The list detailed in paragraph 1.5 is not exhaustive and there is a need to provide pitches for sports that are not that well known.

Councillor Dan Ledger proposed Recommendation 1 and 3 and proposed the following resolution for Recommendation 2.

‘Request that Cabinet at their meeting on 27 March 2024 bring forward costings for dedicated officer resource to fully work up the project to see the delivery of both Strategies.’

Councillor Ledger advised it was a key amenity which the council needs to start delivering for all East Devon residents.

The recommendations were seconded by Councillor Mike Howe.

In response the Assistant Director – Planning Strategy and Development Management advised that as the report to Cabinet on 27 March would not have those specific details. Members could make a recommendation to Cabinet along the lines that they wish to see a resource put into this area of work to help support the delivery and enhance the additional sports pitch provision in the district.

Councillor Ledger said he was happy with the Assistant Director – Planning Strategy and Development Management’s suggestion but emphasised the need for a timeframe to be included.



**RESOLVED:**

1. That the ongoing work on production of the Playing Pitch Strategy be noted and that in principle support be provided for the work to date and direction of travel.
1. To note that following resolution of 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 to be brought back to Committee as a final draft of the Strategy in the summer.

**RECOMMENDED TO CABINET:**

That Strategic Planning Committee recommend to Cabinet that the Council should play a role in the delivery and enhancement of the playing pitch provision within the district and that resources should be put in place to enable this work.

**Attendance List**

**Councillors present:**

J Bailey  
K Blakey  
B Collins  
O Davey (Chair)  
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  
C Brown  
J Brown  
R Collins  
P Faithfull  
R Jefferies  
G Jung  
M Rixson

**Officers in attendance:**

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

**Councillor apologies:**

B Bailey  
P Fernley  
C Fitzgerald  
M Hartnell

Chairman .....

Date: .....

## **EAST DEVON DISTRICT COUNCIL**

### **Minutes of the meeting of Strategic Planning Committee held at Clyst & Otter Rooms, Blackdown House, Honiton on 12 March 2024**

#### **Attendance list at end of document**

The meeting started at 10.00 am and ended at 12.50 pm. An adjournment took place at 11.28 am and reconvened at 11.40 am.

#### **78 Declarations of interest**

Members advised receiving lobbying communication from Mr Paul James who spoke during the public speaking section.

#### **79 Public speaking**

Paul James spoke on item 7 – Proposed Employment Sites for Consultation and addressed the Committee on site reference Wood\_38 land adjoining Greendale Business Park to give his reflection on what businesses were facing due to current unavailability of employment land in East Devon.

Members were advised that the owners of Greendale Business Park who currently employs over 2,000 people and deliver vital services to East Devon had been approached by an applicant who wanted to consolidate three businesses and to operate from the business park as there were no other large suitable sites available. Unfortunately, Greendale were unable to accommodate this request due to being at full capacity and not being able to expand beyond its current boundary. Mr James advised that if the owners of the business park were permitted, they could expand the site sustainably and quickly and without the need to purchase any land which in turn would accelerate business rates contributions each year and increase job opportunities. Mr James urged Members to support the expansion of the business park to help local businesses to stay in East Devon which in turn would keep skilled jobs in East Devon and help maintain economic growth.

#### **80 Matters of urgency**

There were no matters of urgency.

#### **81 Confidential/exempt item(s)**

There were no confidential or exempt items.

#### **82 Creation of Local Plan Member Working Group**

The Committee considered the Director of Governance and Licensing's report that sought Members agreement to the setting up of an informal working group to oversee the development of the East Devon Local Plan. The working group would be made up of the Leader of the Council, Chair and Vice Chair of the Strategic Planning Committee and four other members of the Committee.

The Director of Governance and Licensing reassured Members that the working group, which would meet on a regular basis every 2-3 weeks during the day, would simply be to

oversee the progress to ensure it keeps to the timetable and that it would not make any decisions in respect of the process of the Local Plan.

Discussion covered:

- Need to be flexible on the time on the meeting to accommodate Members who work during the day.
- What is the purpose of the working group if it will not be making decisions. It was advised that its purpose was to make sure the progress of the Local Plan was going in the right direction.
- Need to involve more Members to help set the direction.
- Some Members supported the need for the working group as it would help steer direction.
- Need to agree the principles of the working group.
- Some Members did not support the need for a working group expressing their concerns about it being done behind closed doors which could be perceived by members of the public that the direction of the Local Plan was being influenced which could damage the council's reputation.
- It was questioned whether there was capacity for regular meetings.
- Members were in support of the suggestion to invite specific ward members to discuss specific areas with the working group.

The Assistant Director – Planning Strategy and Development Management acknowledged Members concerns and advised that the working group would help to keep the Local Plan progress on track and would also help to join up all the different elements of the Local Plan as they were all interconnected.

Following discussions, the Planning Solicitor emphasised that if Members agreed to the Working Group it should proceed without delay and requested a show of hands of Members who would be interested in joining the group.

#### **RESOLVED:**

The Committee agreed to set up an informal Local Plan Working Group to oversee the development of the East Devon Local Plan and agreed that the Working Group should be made up of the Leader of the Council, Chair and Vice Chair of Strategic Planning Committee, Councillor Brian Bailey (Exmouth Ward Member), Councillor Jess Bailey (West Hill Ward Member), Councillor Todd Olive (Whimple and Rockbeare Ward Member) and Councillor Dan Ledger (Seaton Ward Member).

### **83 Proposed Employment Sites for Consultation**

The report presented to Members provided an update on the proposed 'new' employment sites that had been assessed following a clear steer from the Greater Exeter Economic Development Needs Assessment on employment needs across the area.

It identified 80 hectares of additional employment land with an accompanying assessment of around 50 hectares based on the needs-based market made through enquiries. Members noted that the figure for current and future employment needs would be in the region of between 80 – 130 hectares.

The existing and proposed employment site allocations for Members consideration were outlined in appendix 1 which totalled 119.48 hectares of employment land which did not include an additional 35.9 hectares of land at Cranbrook and the second new community that could be allocated in the new Local Plan.

Members were also asked to consider whether the employment sites assessed in appendix 2 should be included in the Regulation 18 Addendum Consultation including some proposed draft wording on policy.

The Assistant Director – Planning Strategy and Development Management updated Members on GH-ED-43 and asked for delegated authority to make some minor amendments and corrections to the site assessment following recent works completed to Long Lane and the amendments to the bus routes in that area.

Discussion covered:

- A concern was raised that a lot of development was being proposed on green spaces.
- A concern was raised that a lot of employment sites were being proposed close to Exeter which closes the gap between Exeter and East Devon. The Assistant Director – Planning Strategy and Development Management advised that land in the eastern side of the district had been put forward during the first consultation so there was a good spread across the whole of the district.
- On behalf of Woodbury residents, the Portfolio Holder for Coast advised that the suggestion of Greendale Business Park being expanded further would not be beneficial and was not supported.
- Where is the economic opportunity for the eastern side of the district.
- Clarification was sought on Polt\_04 and Polt\_05 detailed on pages 54 – 58 and whether these two sites would be considered as one site. It was advised the two parcels of land had been put forward separately and therefore would be considered as separate.
- Need to consider potential pressures from other districts.

**RESOLVED:**

That the employment sites detailed in this report were to be consulted on as part of the Regulation 18 Addendum consultation planned to start at the beginning of April and that delegated authority be given to the Assistant Director – Planning Strategy and Development Management to make any necessary minor changes prior to the consultation.

84 **Designated Neighbourhood Area Housing Requirement in the new Local Plan**

The Committee considered a full detailed technical report that set out two options for calculating the housing requirement figures for each designated neighbourhood area based on whether to include a windfall allowance or to not include a windfall allowance.

The Assistant Director – Planning Strategy and Development Management referred to the summary table in Appendix 1 Figure 2 that gave an indication of the likely figures for each area but advised Members this would require updating before the publication of the draft Local Plan.

He also referred to Appendix 2 which was a technical report that set out the context for the work which provided information on the policy position, lessons learned from other Local Plans which apply to East Devon and the assessments of each option. This was accompanied by Appendix G a summary table of Designated Neighbourhood Area Housing Requirement areas that set out how the figures had been calculated and which sites had been included.

Discussion covered:

- Members welcomed the detailed and informative report.
- Clarification was sought on some sites that were very close to different towns and how this would determine which town these sites would fall under. It was advised that the report had stated that the Designated Neighbourhood Areas would coincide with parish boundaries.
- It is important to be clear in Appendix 1 that the figures proposed will not require any more sites to be designated within neighbourhood areas.
- Clarification was sought whether the figures would change if planning permission was granted.
- There is a need to consider Coastal Preservation Areas and only development in these areas if there is a specific reason.
- Concerns were raised about some housing requirement figures in towns and villages.
- Clarification was sought on whether Members would be required to make decisions about what areas would have housing. The Assistant Director – Planning Strategy and Development Management advised that Members were only required to agree the methodology today and the figures presented were merely illustrative figures to help understand how the methodology works.
- Some concerns were raised that some communities will be swamped with houses.

Councillor Paul Hayward and Councillor Bethany Collins left the meeting during discussions.

**RESOLVED:**

1. That the technical report (Appendix 2 of this report) be endorsed as evidence setting out the rationale for the selection of the reasonable alternatives and as the basis for the calculation of Designated Neighbourhood Area Housing Requirement figures in the emerging Local Plan.
2. To note the calculations for Designated Neighbourhood Area housing requirement (Appendices F and G of the technical report), prepared in accordance with the methodology set out in the technical report.
3. That the method selection for the calculation of Designated Neighbourhood Area housing requirement be agreed and can now be subject to public consultation.
4. That the non-technical summary information (Appendix 1 of this report), including the summary table of housing requirements be agreed as the basis for the Spring 2024 public consultation, alongside the publication of the full detailed technical report with appendices as supporting information.
5. Delegated authority be given to the Assistant Director – Planning Strategy and Development Management in consultation with the Chair of Strategic Planning Committee for any minor/non-material amendments for the final release.

85 **Coastal Preservation Area Policy Boundaries in the new Local Plan**

The report before Committee outlined the process to review the coastal preservation area policy boundaries to ensure they were up to date before their inclusion in the new Local Plan.

The Assistant Director – Planning Strategy and Development Management introduced Chris Hariades, the Landscape Architect who was happy to answer any questions.

The Assistant Director – Planning Strategy and Development Management provided a brief overview of their purpose which was to protect the undeveloped coast visible from cliff top, beach, sea or estuary or form part of the view from significant lengths of an access road, public footpath or bridleway leading to the coast. He referred to paragraphs 2.9 to 2.10 that detailed five distinct sections defined in the assessment.

Members noted that there were a few changes proposed at this stage which were:

- To correct anomalies in the previous boundaries.
- To include areas that were now considered important to protect.
- To omit areas where recent development had taken place and no longer appropriate to be included.

Members also noted that there were 10 potential allocations within the draft Local Plan that were within the proposed Coastal Preservation Areas and would subsequently be removed in the event that they were to be allocated but at this stage it was proposed for them to remain in the consultation until a decision had been made about their allocations. The Assistant Director – Planning Strategy and Development Management highlighted that this equated to 882 homes which would need to be found elsewhere in potentially more sensitive locations to help meet housing need.

Discussion covered:

- The Portfolio Holder for Coast commented that over the last few years it would seem we used the Green Wedge designation more to determine if a planning application was acceptable in coastal locations than Coastal Protection Areas and suggested a more strengthened version than the one proposed as follows:

#### **Coastal Preservation Areas**

Coastal Preservation Areas Land around the coast and estuaries of East Devon, as identified on the Policies Map, is designated as a Coastal Preservation Area. The Coastal Preservation Area is defined on the basis of visual openness and views to and from the sea.

Development or any change of use will not be allowed if it would damage the undeveloped/open status of the designated area or where visually connected to any adjoining areas.

Only appropriate proposals which would increase biodiversity or habitat mitigation or provide improved public footpath or multi use trail within these areas will be supported.

This rewording would permit woodland creation, SANGS areas, country parks and multi-use or footpath trails that would benefit the coastal areas for nature and for increased public access. However, prior to any final decision the council may need to review Teignbridge Council's Policy EN2 – Undeveloped Coast. As we face them and benefit their coast on the opposite bank of the Exe it may be appropriate to mirror

their policies in this regard and prior to the next consultation compare the two strategies and possibly combine the two district strategies.

- How do National Landscapes compare with Coastal Preservations Areas.
- Reference made to page 326 and clarification was sought about the land not included in the Coastal Preservation Area. The Landscape Architect advised the area was above the normal tidal limit and not within the Coastal Preservation Area.

Councillor Jess Bailey left the meeting during discussions.

**RESOLVED:**

1. That the assessment supporting the Coastal Preservation Area policy of the Local Plan, set out in Appendix 1 of this report be endorsed.
2. That the draft Coastal Preservation Areas, drawn in accordance with the methodology set out in the appendix be subject to public consultation.

**Attendance List**

**Councillors present:**

B Bailey  
J Bailey  
B Collins  
O Davey (Chair)  
P Fernley  
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  
C Brown  
R Collins  
P Faithfull  
G Jung  
M Rixson

**Officers in attendance:**

Ed Freeman, Assistant Director Planning Strategy and Development Management  
Damian Hunter, Planning Solicitor  
Melanie Wellman, Director of Governance & Licensing (Monitoring Officer)  
Chris Hariades, Landscape Architect, Development Management  
Wendy Harris, Democratic Services Officer

**Councillor apologies:**

K Blakey  
C Fitzgerald

Chairman .....

Date: .....



Report to: **Strategic Planning Committee**

Date of Meeting: 2 April 2024

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



## **Potential for designation of a Green Belt in the West End of East Devon**

### **Report summary:**

On the 13 February 2024 this committee resolved 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. This report provides commentary around such a proposition highlighting that, from officer review, it would be inappropriate to seek to pursue the option of Green Belt designation. There would be very significant tests to meet to secure designation and that designation itself (if successful) could lead to wider potential adverse impacts.

### **Is the proposed decision in accordance with:**

Budget Yes  No

Policy Framework Yes  No

### **Recommendation:**

That committee does not endorse the proposal to seek to designate a Green Belt in East Devon.

### **Reason for recommendation:**

To ensure Members of committee are aware of the challenges and risks involved in seeking a Green Belt designation and to provide clarity that this is not regarded as an appropriate policy option to pursue.

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### **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)

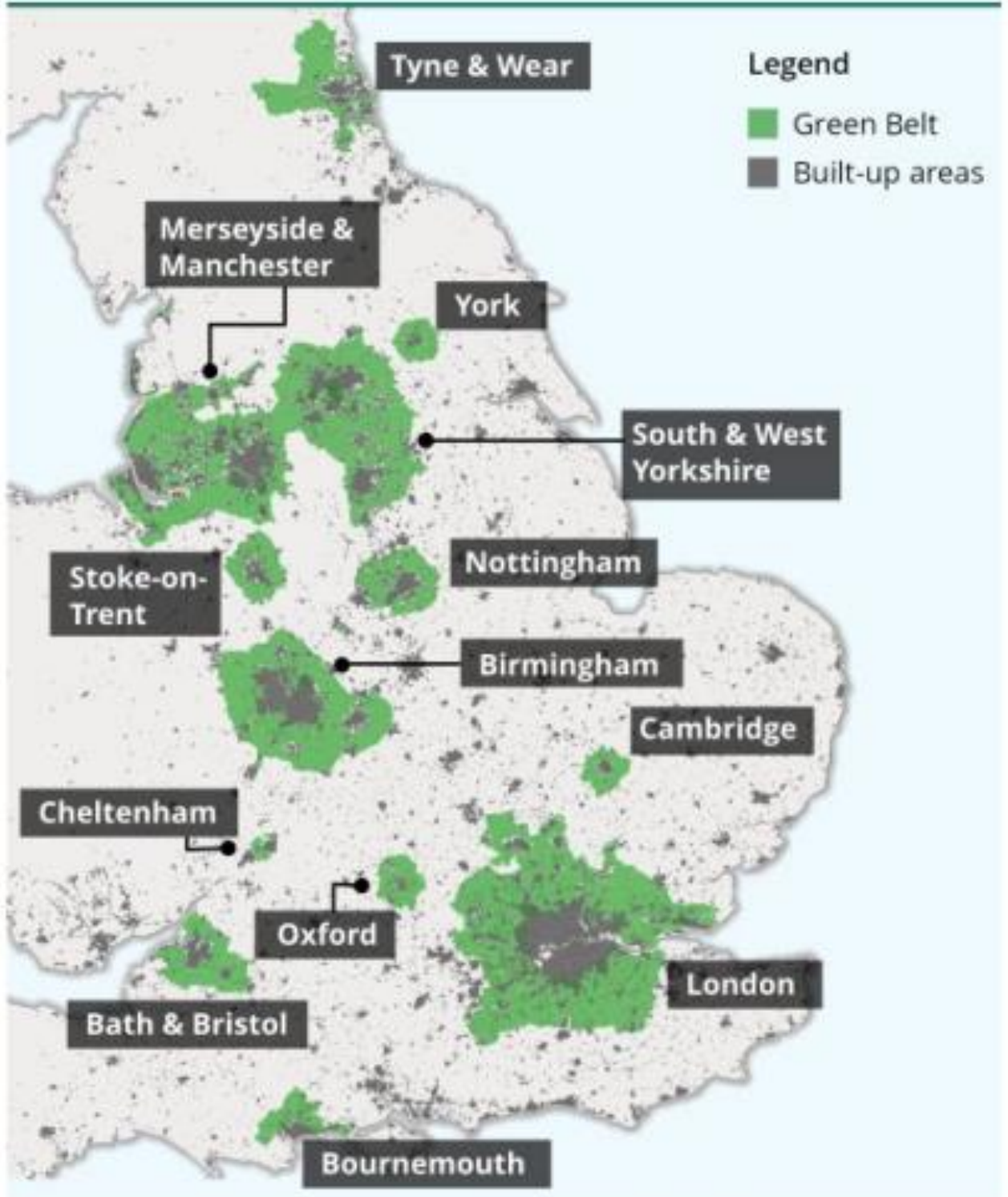
- Better homes and communities for all
  - A greener East Devon
  - A resilient economy
- 

## **1. Historical background and Green Belts in England**

- 1.1 Green Belts are a formal planning designation that place very considerable constraints on the potential for development in the designated area. Conceptual thinking around ideas and relevance of green belts can be traced back to the 19<sup>th</sup> century (if not before) but specific legislation providing for designation first arrived in 1938.
- 1.2 The first Green Belt designated in England was around London and this was followed in the 20<sup>th</sup> century by a number of subsequent designations. Whilst existing Green Belt boundaries are subject to period changes and amendments, and this can be a very challenging exercise – even where minor changes are proposed, it is many years since any brand new Green Belts have been designated in England.
- 1.3 The map below/over the page shows the areas and extents of Green Belts in England with the one around London outlined in red. Typically, and by clear design, Green Belts have (for the most part) been drawn and defined to run around the full outer edges of major urban areas extending some way into adjoining countryside. They are typically large (some extremely large) though there are some outliers that are smaller. The smallest at around 700 hectares being the Green Belt between the towns of Burton on Trent and Swadlincote (at the Staffordshire/ Leicestershire border). The nearest Green Belts to East Devon are found around the major conurbations of Bristol/Bath and Bournemouth/Poole.

# Where is England's Green Belt land?

Green Belt boundaries as at March 2023



Source: DLUHC, [English local authority Green Belt dataset, 2020/21 boundaries](#) [Accessed 4 December 2023]

## 2. Government policy for Green belts

2.1 The role and function of Green Belts, as set out in Government policy and guidance, has evolved and changed over the years, but the NPPF, as at December 2023 states:

*“142. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*

*143. Green Belt serves five purposes:*

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

*144. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. Any proposals for new Green Belts should be set out in strategic policies, which should:*

- a) demonstrate why normal planning and development management policies would not be adequate;*
- b) set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;*
- c) show what the consequences of the proposal would be for sustainable development;*
- d) demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and*
- e) show how the Green Belt would meet the other objectives of the Framework.”*

2.2 Any proposal for seeking the establishment of a new Green Belt in East Devon would need to be considered against and within the context of the above considerations. We would stress, however, that the following considerations are fundamental in respect of achievement of a Green Belt.

- i. It would be fraught with challenges;
- ii. It would be time consuming to establish a case and evidence;
- iii. It would be a complex exercise to justify a case;
- iv. It could prove to be very expensive to amass relevant evidence;
- v. there are very serious concerns around whether it would be successful; and even if successful there may be unexpected negative impacts arising.

2.3 Further to the above, we would highlight that any proposal for designation could be expected to be very rigorously assessed by a Planning Inspector at Examination. Seeking a new Green Belt designation would be a very unusual local plan aspiration and as such could be expected to be very carefully scrutinised.

- 2.4 But even before getting to plan Examination there is a very real possibility that any proposal for designation, or the local plan itself, could be ‘called-in’ by the relevant Minister who may veto the proposal. Whilst Paragraph 142 of the NPPF indicates that the Government attaches great importance to the designation of Green Belts, it is suggested that this perhaps relates to those already established as opposed to new proposals coming forward. There are many critics of the worth and value of Green Belts and their relevance for today.

### **3. Key issue for consideration in respect of possible Green Belt designation**

- 3.1 This section of this report returns to the five considerations for designation set out in paragraph 143 of the NPPF (a to e) – see sub-headings and commentary below. But we would also highlight that the NPPF does set out in paragraph 143 that “*The general extent of Green Belts across the country is already established*”. It might be inferred, though it’s recognised that it is not stated, that the expectation is that new ones should not really be defined. With respect to meeting the criteria (setting out in policy) the NPPF does not specify whether at least one should be met, or more than one or all of them. Though it is suggested that the more that can be demonstrated the stronger any case may be expected to be.

#### **NPPF Para 114 – Criterion a) - demonstrate why normal planning and development management policies would not be adequate**

- 3.2 As Members will be aware there are draft local plan policies at the West End that provide for development. There are also, already, significant policy tools and constraints that apply in the adopted local plan, and that have been proposed in the emerging local plan, that cover the West End of the District. These include settlement boundary and countryside protection policies, Green Wedges, an enlarged Clyst Valley Regional Park, floodplains and environmental and heritage designations. Plus there are substantive tracts of National Trust owned land that is not readily developable (much understood to be inalienable), notwithstanding planning policy limitations.
- 3.3 Bearing in mind the existing planning policies and those proposed in the new plan, there would be a need for a very strong case to justify why Green Belt designation is required and why existing and new emerging local plan policies are not appropriate or adequate. We would suggest that providing such a case would be very challenging.

#### **NPPF Para 114 – Criterion b) - set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary**

- 3.4 We note that the new draft local plan does propose substantial new development in the vicinity of Exeter and as such there are some changes in circumstance and characteristics for this part of East Devon. Such changes can also be read in recognition that Paragraph 144 itself refers to potential justification being where new settlements or major urban extensions are proposed. As such, against such concerns, there may be a case for Green Belt designation in East Devon. This is particularly so in respect of the new town, but with respect to urban extensions we would question

whether such proposals in the new draft local plan could really be described as major in the context of this NPPF reference. We would highlight that the urban extensions that already are being built are being successfully accommodated without a Green Belt in place. Furthermore, Cranbrook includes substantive open green space and parkland within the built form areas and also large green areas to the town edges.

**NPPF Para 114 – Criterion c) - show what the consequences of the proposal would be for sustainable development**

- 3.5 In the absence of a complete and comprehensive assessment it would be very challenging to provide anything approaching a full rigorous critique of what is an open ended criterion of ‘sustainable development’. If assessment is deemed appropriate it may sit most logically within the on-going local plan sustainability assessment work. However, at this stage, we would highlight ‘Sustainability Objectives’ set out in the Sustainability Appraisal for the draft local plan - [sa-of-pos-consultation-draft-lp\\_2022.pdf \(eastdevon.gov.uk\)](#)
- 3.6 In the table below/over the page we set out some commentary around some of the possible impacts of Green Belt designation when measured against Sustainability Appraisal objectives. We do so in the specific context of the constraining impacts on development that Green Belt designation could be expected to have, though we do also seek to comment more widely. We would stress the commentary does not aim to be comprehensive and full in coverage of every matter – but it does give a flavour of some key considerations.

<b>Sustainability objective</b>	<b>Commentary around Green Belt impacts – especially in the context of limiting development potential</b>
<p><b>1. Biodiversity</b></p> <p>To conserve and enhance the habitat and wildlife of our natural environment</p>	<p>The non development of Green Belt designated land might be expected to have positive impacts (or more precisely resist some negative impacts) though with Biodiversity net gain coming into force this may not hold true. Of more concern, however, is the possible impact that not building on any designated Green Belt land (with much of the land close to Exeter not being of high wildlife value) places an extra burden on development of land elsewhere in East Devon, much of which is of higher wildlife value.</p>
<p><b>2. Landscape</b></p> <p>To conserve and enhance the special qualities and distinctive character of our landscapes, undeveloped coast and seascape</p>	<p>By displacing development to other parts of East Devon a Green Belt designation would place extra development pressure on parts of the District that are of high landscape value. This specifically includes National Landscape areas and also undeveloped coastal areas.</p>
<p><b>3. Historic and built environment</b></p> <p>To conserve and enhance our heritage assets and promote high quality design and accessibility in new development</p>	<p>The parts of the district that are close to Exeter have features of built environment importance. Whilst Green Belt designation may have some general positive benefits on resisting adverse impacts on designated features and buildings such assets do already benefit from particular protection, so real net impacts of designation assets may be limited.</p>
<p><b>4. Climate change and carbon emissions</b></p> <p>To minimise greenhouse gas emissions</p>	<p>One of the researched concerns in England is development ‘jumping the Green Belt’ - i.e. being built in locations that are away from major urban areas (in our case specifically Exeter but also such attractors as employment sites in the West End of East Devon). Any development that is displaced away from Exeter may lead to longer distance travelling for jobs and other purposes with less attractive public transport options. One impact (and research has shown this elsewhere in England where Green Belts exist) could be greater carbon emission levels from extra travel, and there are concerns around associated increased congestion.</p>
<p><b>5. Climate change adaptation</b></p> <p>To adapt to the possible effects of climate change</p>	<p>Green Belt land could provide scope for climate change adaption measures, such measures may not be restricted under plan policy.</p>

<p><b>6. Land resources</b></p> <p>To utilise our land resources efficiently and minimise their loss or degradation</p>	<p>Much of what could be Green Belt designated land is high quality agricultural land and as such designation may protect such land from loss and could see real net benefits therefore occurring.</p>
<p><b>7. Water resources</b></p> <p>To utilise our water resources efficiently and minimise their loss or degradation</p>	<p>The River Clyst, leading to the Exe Estuary, is of water quality concern and significance. Resisting development may have net benefits in this catchment. However, other rivers and catchments in East Devon are also of importance and any displaced development could adversely impact on them.</p>
<p><b>8. Homes</b></p> <p>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure to meet East Devon's needs.</p>	<p>Green Belt designation could place significant constraints on potential for development, in particular close to Exeter where there is strong market demand. As such designation may have adverse impacts.</p>
<p><b>9. Health and well-being</b></p> <p>To support healthy and active communities where people have access to attractive and functional recreation spaces</p>	<p>Green Belt land is not specifically designated on account of being attractive and of recreational value. There is, however, specific local plan policy, in the form of the Clyst Valley Regional Park that is explicitly geared towards securing outputs around this objective. So whilst a Green Belt designation would not be expected to directly lead to health benefits other pro-active policy initiatives should.</p>
<p><b>10. Access to services</b></p> <p>To provide accessible and attractive services and community facilities for all ages and interests.</p>	<p>One of the attractions of developing close to Exeter, in land that could be Green Belt, is that it is close to very good services and facilities. Unless displaced development were to go to (some) East Devon towns new dwellings may well end up in locations that are more remote from services and thus in locations with lower levels of access.</p>
<p><b>11. Jobs and employment</b></p> <p>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity.</p>	<p>The West End of East Devon has been a focal point for new high-quality jobs. Restrictions on development could prejudice further economic growth potential in this part of the District and as such have net adverse economic impacts.</p>



<p><b>12. Town centres</b></p> <p>To safeguard and strengthen the vitality and viability of town centres.</p>	<p>Displacement of development from a possible Green Belt designated area, if that displacement went to our existing towns, could lead to net positive benefits. Though it would depend on where any displacement was to go.</p>
<p><b>13. Connectivity and transport</b></p> <p>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within and beyond East Devon.</p>	<p>One of the attractions of development in the West End is that connections, by East Devon standards, are very good. Green Belt designation, leading to displaced development, could go to locations that are not so good.</p>

3.7 The above table highlights some possible sustainable development benefits that may arise from Green Belt. However, the overall concern is one of there potentially being greater net negative impacts. One of the real issues is where any future development, displaced by Green Belt designation, would be located. The highly challenging issue is whether such locations, especially given the assets and constraints across much of East Devon, would be better locations for development – the real concern is that they would not and, as such, net negative sustainable development impacts would occur.

**NPPF Para 114 – Criterion d) - demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas;**

3.8 Notwithstanding that there are some (though generally limited) existing Green Belt designations that do not wholly or largely wrap around major urban areas any Green Belt that was just in the West End of East Devon would be an outlier in respect of the typical national use of the designation. If a case for a Green Belt were to be more fully robust it would be likely to be most credible if it wrapped around most or all of the City of Exeter (or at the very least assessment of potential boundaries, if not finally designated, included all land around the City). In this respect it would be an Exeter Green Belt that extended into adjoining local authority areas. We are not aware of the City Council (or of Teignbridge or Mid Devon councils) pursuing the option of seeking a designation.

3.9 Any proposal to designate a Green Belt, specifically if it were pursued just for land in East Devon, would generate significant Duty to Cooperate concerns and discussions. More explicitly it could also generate objections from neighbouring authorities if they saw unreasonable constraints coming into play. A Planning Inspector at plan

Examination could be expected to very carefully scrutinise Green Belt proposals in the light of any objections from neighbouring authorities.

**NPPF Para 114 – Criterion e) - show how the Green Belt would meet the other objectives of the Framework.**

3.10 At this stage we have not sought to address this consideration. Not the least because it is not immediately clear how it would be undertaken without a paragraph-by-paragraph critique of the NPPF. Notwithstanding this fact, however, text above and elsewhere in this report is relevant to many aspects of the NPPF.

**4. Other planning considerations relevant to possible Green Belt designation**

4.1 We would also highlight, in addition to the above, other considerations that would be relevant to potential Green Belt designation.

4.2 There is a permanency to Green Belts, they must be looked upon as designations that run way beyond the life of a local plan – perhaps 30, 40 or 50 years or more into the future. Whilst this permanency may have attractions for some it does raise questions around meeting longer term development needs and challenges. In this context any assessment for designation would need to consider long term development needs, for example potentially into the 2040s, 2050s or beyond and consider how any boundary definition might provide for this longer-term growth. In this respect drawing a Green Belt might not be expected to be a simple ‘blanket-coverage’ policy area. It could well be expected that holes or gaps could be left within it around its edges to accommodate or at least allow for future development. It almost implies a case of needing to plan now for development over the next 30 or 40 or more years, or at least have a clear expectation of where it would go and as such to not put the Green Belt in those locations. This in its own right could cause concern for those in areas that are not proposed to be designated.

4.3 We would also highlight that it would inevitably take a long time to amass relevant evidence to support a designation. We do not consider, given the time involved in respect of the work needed, that it would be possible to progress a local plan to a Regulation 19 stage of plan making this year (or early next). As such we would suggest that it would not be possible to get an adopted local plan by the end of December 2026 – the deadline the Government has advised of before a new local plan making system comes into operation and old-style plans must be adopted.

4.4 One of the reasons the work on designation would take so long is that it would involve, and require, very detailed and careful analysis work to determine the position of boundary lines. This report by reference and inference highlights some of the matters that would be relevant in line definition. But boundary considerations would need to drill into far more and greater detail than that used for other ‘more regular’ policy boundaries. There would be the need for very precise assessment work with explicitly worked up, tested and reviewed criteria established to determine how boundaries would be defined – this alone could take a long time and be complex. There may also be the need to consult on the criteria and then there would be the lengthier job of actually applying the criteria in practice.

4.5 'Inner' Green Belt boundaries would fall around built-up and urban areas and villages, these might be simpler to establish, though still not without significant challenges. 'Outer' boundaries, however, are likely to be far more challenging as they could be expected to run through large areas of open countryside. It could be very challenging to establish which fields, for example, may be worthy or appropriate for inclusion in a Green Belt, through the assessment process, and which, potentially adjoining, are not.

## **5. Conclusions**

5.1 From officer assessment we would see very substantive challenges in respect of any attempt to secure a Green Belt in East Devon. We would raise significant challenges in terms of gaining Government support and we would highlight major challenges in reaching and exceeding the very high thresholds that need to be satisfied to secure a designation.

5.2 We would also highlight that as work on the Clyst Valley Regional Park expansion continues, and specifically master planning on the new community progresses, there may be very real opportunities to address some of the development pressure concerns that members may feel exist. Furthermore, these other work streams provide the opportunity to undertake and plan for positive and proactive outcomes in a way that the development restrictive nature of Green Belts does not actively provide for (noting NPPF references to Green Belt purpose).

5.3 Should a Green Belt ultimately be sought we would suggest that the matter be researched over a longer time period and outside of and beyond the work of the local plan that is currently being progressed. Further work on seeking Green Belt designation would require extra staffing resources and would have additional cost implications.

5.4 In conclusion, should Committee wish to pursue a Green Belt option, we would suggest it should fall to another later local plan and that required work should be properly planned out and budgeted for. It may be that specialist consultants would need to be engaged, noting that, even for just existing Green Belt reviews, many planning authorities will employ consultants to undertake work.

### **Financial implications:**

There are no direct financial implication resulting from the proposed recommendation. However, with any further work additional costs are likely and therefore new budget requirements will need approval and financing.

### **Legal implications:**

The legal implications are covered in the report.

Report to: Strategic Planning Committee

Date of Meeting 2 April 2024

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



## Clyst Valley & New Communities LCWIP Consultation

### Report summary:

Devon County Council are undertaking a consultation on a draft Local Cycling and Walking Infrastructure Plan (LCWIP) for an area of East Devon stretching from the Killerton estate in the north, down to Woodbury and east to Whimble and Aylesbeare. This geographic area picks up the strategic growth areas of East Devon that are located in the west of the district, including the proposed site of a second new community as proposed in the emerging Local Plan.

The draft LCWIP identifies existing and proposed routes for walking and cycling that it is considered will be necessary to provide people with the best opportunities to walk and cycle as a genuine alternative to private transport for both leisure and commuting purposes. This committee report sets out a proposed response by this council to the consultation.

### Is the proposed decision in accordance with:

Budget Yes  No

Policy Framework Yes  No

### Recommendation:

That committee endorse the proposed response to the Clyst Valley & New Communities LCWIP consultation and approves its submission to Devon County Council.

### Reason for recommendation:

To provide feedback to Devon County Council in respect of walking and cycling infrastructure in the strategic growth areas in the west of the district.

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Portfolio(s) (check which apply):

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

- Sustainable Homes and Communities
- Culture, Leisure, Sport and Tourism

**Equalities impact** Low Impact

**Climate change** Low Impact

**Risk:** Low Risk;

**Links to background information** [Clyst Valley and New Communities Local Cycling and Walking Infrastructure Plan - Have Your Say \(devon.gov.uk\)](#)

**Link to [Council Plan](#)**

Priorities (check which apply)

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

## 1. Background

- 1.1. Local Cycling and Walking Infrastructure Plans (LCWIP) were introduced by the government in 2017 and are documents that in Devon are produced by Devon County Council. The aim of an LCWIP is to identify strategic cycling and walking improvements required at a local level and planned over a 10-20 year period. They form a vital part of the Government's strategy to increase the number of trips made on foot or by cycle. Critically, going forward, LCWIPs are an important part of local authorities making the case for future active travel funding, whether through securing grants or in negotiations with developers.
- 1.2. The significant growth that has taken place in the western part of the district, around Cranbrook and abutting the administrative boundaries with Exeter has benefitted from upgrades to the local walking and cycling infrastructure, notably with the provision of the Redhays bridge crossing the M5 and shared walking and cycling provision out to Cranbrook. With further strategic developments in the West End of the district planned in both the existing development plan and the emerging Local Plan, it was considered appropriate to develop an LCWIP for this part of the district. As a stakeholder, officers from East Devon have engaged with DCC over the production of the LCWIP but it remains a County commissioned publication upon which we have been consulted.
- 1.3. The public consultation on the LCWIP is running for a 6-week period, closing on 7 April 2024. DCC have facilitated virtual briefing sessions for interested members of the public and have hosted a consultation event in Cranbrook at the end of March.

## 2. Consultation document

- 2.1. The geographical coverage of the LCWIP has been drawn to take account of key developments and future growth areas but also employment sites and visitor attractions. Accordingly, it includes Cranbrook, developments at Westclyst and Tithebarn as well as the Exeter and East Devon Enterprise Zone sites and Exeter Airport. On top of these existing development sites the major proposed allocation associated with a second new community and other smaller allocations east of Exeter are included. It should be noted that the draft LCWIP was finalised prior to SPC identifying option 1 for the new community as their

preferred option. Finally, the boundary also includes the Clyst Valley Regional Park and land associated with the Killerton estate as well as outlying villages such as Broadclyst, Whimble, and Woodbury. Figure 1 overleaf shows the boundary.

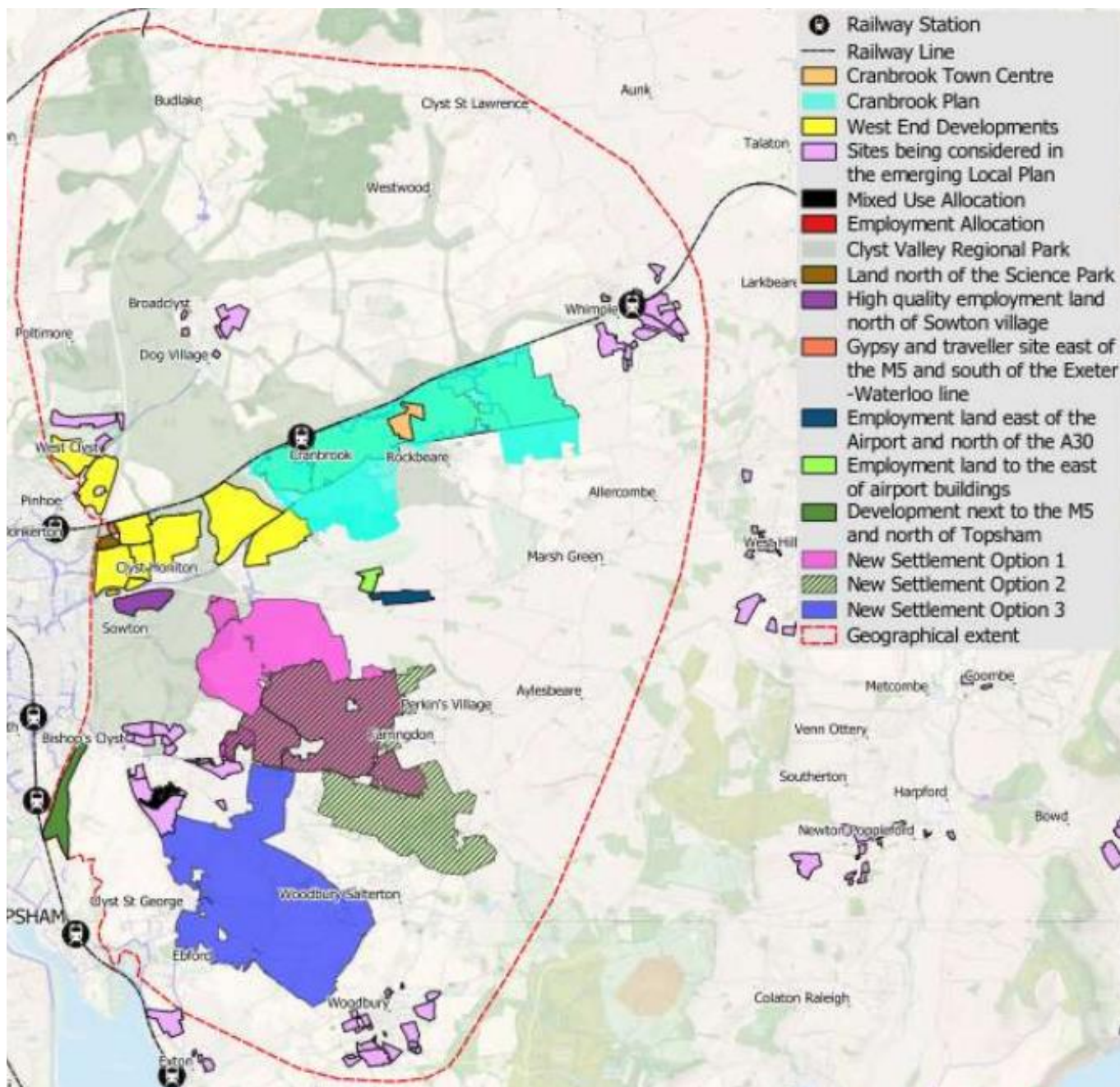
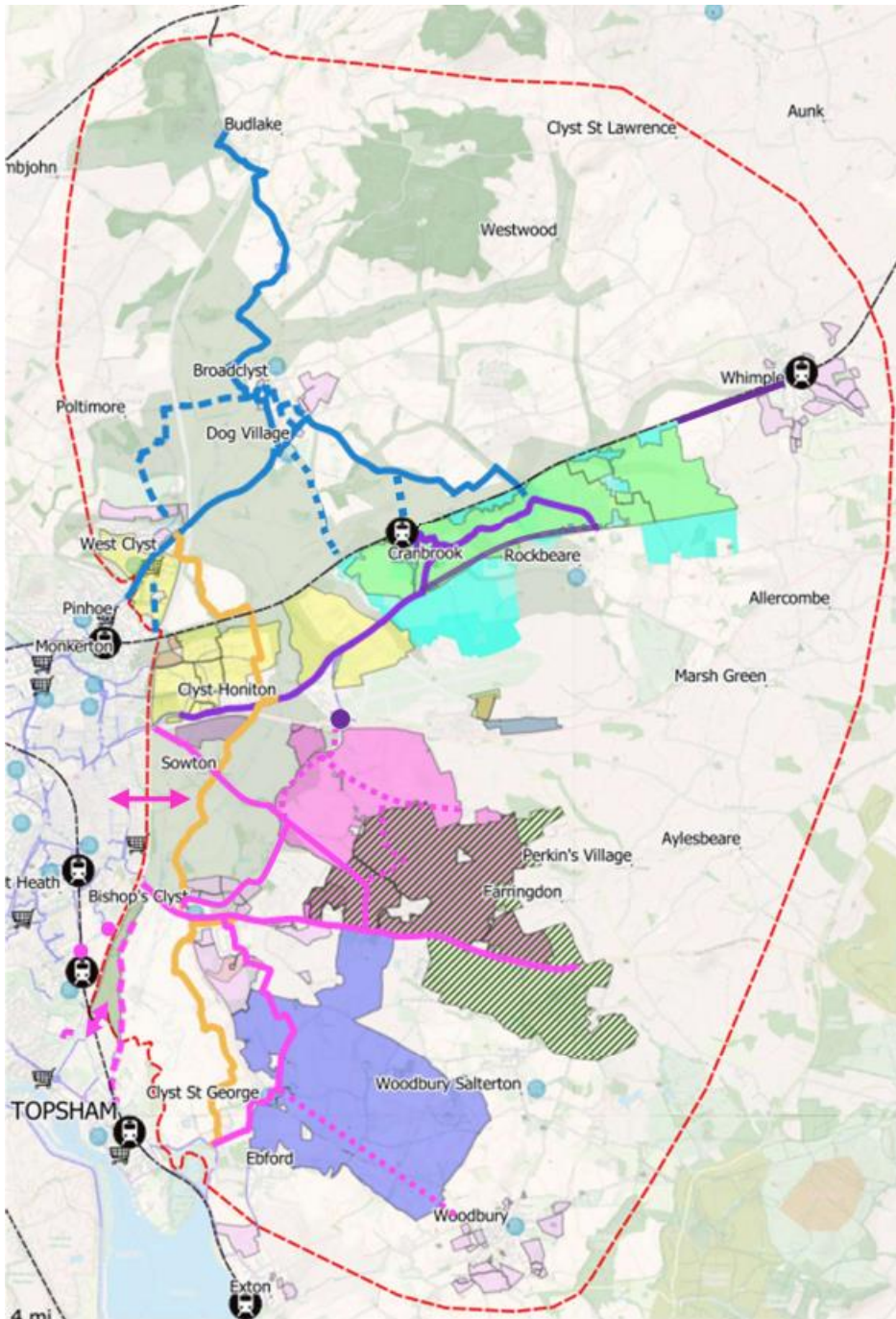


Figure 1 – Map showing the geographical extent of the proposed LCWIP

2.2. There are currently low levels of cycling in the study area, particularly when compared to urban areas in England. This may be influenced by the rural, unlit nature of many routes that make them less attractive to use. In addition, hills in some areas are a significant barrier to increased cycling for some people. There is currently a fairly fragmented existing cycle network in the area, with inconsistent provision of dedicated cycle routes.

2.3. The LCWIP identifies a series of cycle route recommendations. This includes different options for cycle route provision for a second new community that were based upon the three original options. We will need to include details of the council's preferred option in our consultation response so that changes can be made to the proposals accordingly.



1. Clyst Valley Trail
2. Killerton & Broadclyst
3. Cranbrook
4. Local Plan 2020-2040 new settlement options

Figure 2 – Overview of cycle route recommendations

2.4. An Exeter LCWIP was adopted by Devon County Council's Cabinet in January 2024 and includes within it a number of cycle routes that in part fall within the East Devon boundaries. There is therefore overlap between the two areas, however what hasn't been carried over to the Clyst Villages and New Communities LCWIP are the cycle routes that are in East Devon's administrative areas identified in the Exeter LCWIP. It is felt that for consistency these should be carried over and the two LCWIP's need to be fully integrated with one another to support connected journeys.

- 2.5. The LCWIP guidance recommends that Core Walking Zones (CWZ) are identified. These normally consist of places that are close together with high levels of footfall, such as town centres. However, this LCWIP area does not lend itself to a CWZ because it is currently predominantly rural with small villages, and because larger settlements such as Cranbrook, are recent or do not exist yet and are therefore built to the latest design standards.
- 2.6. In terms of walking, the LCWIP is quite light in detail and focuses on the route from Westclyst to Broadclyst as the two places are only 1 mile apart and a large number of school children travel between the villages, but infrastructure does not meet current design standards. It recognises that for Cranbrook to have improved walking rates it needs to be more self-contained, with increased provision of local employment and amenities. A recommendation of a Cranbrook walking 'bugbears' project is also made in order to address smaller scale issues for people walking, using wheelchairs and mobility scooters in the town. In addition to these recommendations the LCWIP looks to incorporate walking improvements across all routes identified for cycling infrastructure, for example the Clyst Valley Trail which is a proposed multi-use trail associated with the Clyst Valley Regional Park. The walking plan that is included within the document shows the same routes as for the cycling plan included at figure 2.

### **3. Proposed council response to the consultation**

- 3.1. In the box below is set out a proposed response to the Clyst Valley & New Communities LCWIP consultation by East Devon District Council. Subject to Strategic Planning Committee approval, this response will be submitted to Devon County Council.



We are encouraged to see the development of this LCWIP, which is an important document to support the strategic growth that is taking place in this part of East Devon or is proposed for allocation in the emerging Local Plan. We support the principle of the document, and the case for investment in walking and cycling in the Clyst Valley and the new communities being developed in the locality, particularly in relation to climate change, delivering growth in the economy, equality and social inclusion and the health and wellbeing of our residents and visitors.

#### Relationship with Exeter LCWIP

The Exeter LCWIP was adopted by Devon County Council in January 2024. The document focuses on the city boundaries but identifies two cycle routes where improvements are proposed within East Devon. It is important to recognise the relationship between Exeter and the new developments in East Devon and we understand the rationale for the overlap between the two LCWIPs. However, we do believe that there needs to be a consistency and integration between the two, whereby the routes that are in East Devon in the Exeter LCWIP are also shown in the Clyst Villages and New Communities LCWIP; this will support connected journeys. To replicate the routes will not undermine the Exeter LCWIP but will serve to demonstrate the importance of their delivery should an opportunity for securing funding arise.

The E3 (City Centre to Cranbrook) route is identified in the written text of the Exeter LCWIP as proposing a new off-road cycle route from Tithebarn Lane to Cranbrook but this is not reflected in the accompanying plan, albeit it is shown on the overarching network plan. The route is ranked as the second most important cycle improvement in the Exeter LCWIP but is omitted from the current consultation LCWIP. This route is imperative to provide an attractive route for less confident commuters as well as leisure users.

The E13 route (Clyst St Mary to Topsham via Clyst Road) is entirely within East Devon's boundaries and there is a proposed residential allocation adjacent to the route in the emerging East Devon Local Plan. We support improved walking and cycling provision in this location, although any works will also need to retain vehicular access suitable for the proposed allocation.

## General comments

The growth in the LCWIP area has significantly increased employment as well as new housing and these sites are essential to the sub-regional economy. Despite improvements from Exeter to Cranbrook and the Skypark there is an overall lack of appropriate high-quality and attractive cycling and walking infrastructure to facilitate active transport uses and connections with public transport modes to and from employment sites. This is reflected in the small percentage of journeys by bike. In addition to the routes identified in the LCWIP we would like to see more included to support links between employment sites and Pinhoe and Cranbrook rail stations.

Significant destinations in the study area such as Killerton, Poltimore House, Westpoint Arena need to be supported through high quality cycle and walking infrastructure and could be better considered in the LCWIP.

There are a number of opportunities for low-cost quick wins to improve walking and cycling connectivity to the northeast of Exeter, benefitting local communities and key destinations such as Poltimore House. We would welcome the opportunity to identify costed projects in this area to enable quick delivery supported through funding bids.

We are conscious that DCC are simultaneously consulting on a LCWIP for Cullompton and Tiverton. There is the potential to identify onwards cycling connections between the two LCWIP study areas and this could include a link with the Clyst Valley Trail.

## Clyst Valley Trail

The LCWIP prioritises east – west journeys into Exeter but fails to fully recognise the importance of the Clyst Valley Trail for journeys to and from key employment sites (e.g. Skypark, Science Park, Logistics Park, Pynes Hill and Sowton) from the villages in the Clyst Valley, Cranbrook, southern parts of Exeter and the communities along the Exe Estuary. The Clyst Valley Trail also has great potential for impacting leisure trips by connecting the Exe Estuary trail with communities on the eastern side of Exeter as well as Killerton and Ashclyst Forest and Westpoint Arena.

We would like consideration to be given to incorporating wayfinding of an interim Clyst Valley Trail. This would be a positive move to encourage use of the quieter routes following the Clyst Valley and connecting key destinations.

The high prioritisation of the route is supported but without an indicative cost, the LCWIP should state that the county and district councils will work together to develop a schedule of costed route sections that can be used to secure funding and expedite delivery of the trail.

## Cranbrook

We would like to collaborate with the project team to better articulate the cycling and walking routes that are emerging through planning applications for the expansion of Cranbrook as we don't believe that they are all correctly shown at present.

Walking and cycling improvements should also recognise improvements that could benefit Broadclyst Station – e.g. linking to Cranbrook Station and the town's services and facilities.

The LCWIP recognises the current lack of employment opportunities within Cranbrook and that better self-containment should be achieved. This is something that the Council is advancing through investment in land and the development of a town centre masterplan as well as the Cranbrook Plan seeking mixed use expansion of the town. Nevertheless the LCWIP doesn't place a great deal of emphasis on what improvements can be made to improve access and create attractive and desirable routes to the closest employment areas to the town, for example at the Skypark and Exeter Airport Business Park. The area of the airport is also home to the Exeter College Future Skills Centre, the closest 16+ educational establishment to the town and so it is imperative that access improvements are identified. We feel that more could be done to articulate potential schemes to achieve these objectives.

#### Second new community

At a meeting of the Council's Strategic Planning Committee on 5 December 2023 the committee resolved that option 1 be the council's preferred approach for a new community. On this basis we recommend that the LCWIP is reviewed to reflect this and references to options 2 and 3, together with walking and cycling routes required only for those options are removed from the document.

The new community provides an opportunity for delivery of high-quality protected routes linking through the development and connecting it to surrounding villages, existing employment sites north of the A30, the Clyst Valley Trail, the Exe Estuary trail and routes into Exeter. These should be embedded into the LCWIP.

In line with the Strategic Planning Committee resolution of 5 December 2023 the council will be embarking on a master planning exercise for the second new community. This will provide greater detail of how the development will come forward and will build upon the LCWIP in terms of walking and cycling infrastructure.

#### **Financial implications:**

There are no direct financial implications resulting from the report

#### **Legal implications:**

There are no direct legal implications resulting from the report