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Agenda for Strategic Planning Committee Tuesday, 4th February, 2025, 10.00 am

Members of Strategic Planning Committee
Councillors: B Bailey, J Bailey, K Blakey, C Brown, B Collins, O Davey, P Fernley, P Hayward, M Howe (Vice-Chair), B Ingham, G Jung, D Ledger, Y Levine, T Olive (Chair) and H Parr

Venue: Council Chamber, Blackdown House, Honiton

Contact: Wendy Harris;

01395 517542; email wharris@eastdevon.gov.uk

(or group number 01395 517546)
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East Devon District Council
Blackdown House
Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ

DX 48808 HONITON

Tel: 01404 515616

www.eastdevon.gov.uk

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 - 33)

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 Changes arising from the new National Planning Policy Framework (NPPF) (Pages 34 - 38)

8 East Devon Local Plan - approval for Regulation 19 Consultation 2025 (Pages 39 - 602)

9 Exeter Local Plan - Regulation 19 Consultation - proposed response from East Devon District Council (Pages 603 - 611)

10 Self-build and custom housebuilding update and monitoring report 2023-2024 (Pages 612 - 649)

11 New Planning Policy - Local Development Scheme (Pages 650 - 660)

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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 29 October 2024

Attendance list at end of document
The meeting started at 9.10 am and ended at 7.45 pm

216 Minutes of the previous meeting

The minutes of the previous meetings held on 20 September and 9 October 2024 were confirmed as true records.

217 Declarations of interest

Minute 221. Cranbrook Town Centre.
Councillor Paul Hayward, Affects Non-registerable Interest, Close relations live in Cranbrook.

Minute 223. East Devon Local Plan - allocation site selections.
In accordance with the Code of Good Practice for Councillors and Officers dealing with planning matters as set out in the constitution the Chair, on behalf of Committee Members, advised lobbying in respect of numerous site selections

Minute 223. East Devon Local Plan - allocation site selections.
Councillor Bethany Collins, Affects and prejudicial Non-registerable Interest, Relation owns adjoining land to Honi_18 - Land at Kings Road, Hale Close, Honiton.

Minute 223. East Devon Local Plan - allocation site selections.
Councillor Paul Hayward, Affects Non-registerable Interest, In relation to all the Axminster site allocations employed as Town Clerk by Axminster Town Council.

218 Public speaking

Henry Gent spoke about Exeter Airport addressing the airports decline over the years and its poor future, suggesting that Royal Mail would be withdrawing their services from March 2025. He suggested that it would be a great place to put houses as it was close to Exeter and would benefit from existing connectivity.

Colin Danks referred to the Council's current shortfall of 2,278 dwellings detailed in paragraph 3.4 of the report highlighting the difficult situation the Council was facing. He referred to the most challenging sites that committee had previously 'moved on' from which were now back for committee's consideration and suggested to help alleviate this issue that committee could bring forward the sites on the western side of the district that could accommodate smaller sized new settlements. He referred to 'land between Crealy and Greendale' in particular, which could accommodate around 1,500 dwellings as detailed on pages 356 – 357.

Councillor Roy Collins reiterated his concerns about the loss of agricultural land that he previously spoke about at the Strategic Planning Committee meeting on 20 September 2024.

219 Matters of urgency

There were no matters of urgency.

220 Confidential/exempt item(s)

There were no confidential or exempt items.

221 Cranbrook Town Centre

The New Community Manager outlined the current plans for inclusion in the Cranbrook Town Centre Masterplan. The plans identified buildings including key civic buildings and the order they were likely to be delivered which was critically important to support the residents.

The key civic buildings included:

- Cranbrook Town Council's building
- Leisure Centre and Health and Wellbeing Centre
- Till House multi-purpose building
- Cranbox

Clarification was sought about whether there would be a need for a building for a Fire Station. The New Community Manager explained that following discussions with the Devon & Cornwall Fire Service they had advised that although there would be a presence it would co-locate in another building so a separate building would not be needed.

Ward Member, Councillor Kim Bloxham welcomed the report and the masterplan advising that Cranbrook needed facilities and this would be an opportunity to move forward the delivery of the town centre that had been anticipated for too long.

Councillor Bloxham expressed the importance of a leisure centre and decent health provision as the Younghayes Centre were barely coping and would be outgrown within the next year. She accepted that whilst the basic town infrastructure would be delivered by developers through the Section 106 Agreement there was an argument that the town should benefit from bidding into the current Community Infrastructure Levy pot, bearing in mind that Cranbrook is delivering approximately half of the current strategic housing need.

Councillor Bloxham welcomed the move that the delivery of the town centre was to be under the Council's control but stressed the delivery should be sooner rather than later to avoid the frustration of the community that had been shown towards the Consortium as they had been very slow to deliver key infrastructure and had failed to deliver the town centre road, pavements and crossings.

In response the New Community Manager advised that for the expansion of Cranbrook it is detailed in the Cranbrook Plan and the Development Planning Document that there is an expectation for developers to make capital contributions towards facilities including a leisure centre and a health and wellbeing centre and they will contribute £3m towards facilities for DCC to operate their services from.

Comments made by Committee Members included:

- Heartening to see so much support from the residents for the town centre as well as for green space, social space and active travel. It would be good if residents could get an opportunity to have a look at the Masterplan to envisage what their town centre would look like with an opportunity to provide any feedback. The Chair advised Committee that suitable communications could be done if Members endorsed the recommendation.
- Ward Member, Councillor Kevin Blakey advised that the proposed layout for the town centre was in line with what the Town Council and Ward Members had envisaged but reiterated the point raised by Councillor Bloxham that delivery was the key issue.

RESOLVED:
That the Cranbrook Town Centre Masterplan be endorsed as an evidence document for use by project teams looking to develop facilities on the town centre land and by the Local Planning Authority as a material consideration of planning applications on the land subject to minor changes and corrections to be agreed in consultation with the Portfolio Holder for Strategic Planning.

222 East Devon Local Plan 2020 - 2040 Consultation Draft - Consultation feedback

The Assistant Director – Planning Strategy and Development Management presented the report drawing attention to the appended feedback report summarising the 1300 responses received via the Commonplace software and 250 separate emails to the Regulation 18 consultation that ran from May 2024 to June 2024. Members noted that relevant feedback would continue to be provided to committee through reports relating to relevant redrafting of Local Plan chapters.

RESOLVED:
The proposed draft revised chapters in the Local Plan be endorsed, noting that they will need to be refined in readiness for the proposed Regulation 19 draft of the Plan.

223 East Devon Local Plan - allocation site selections

The Assistant Director – Planning Strategy and Development Management set out his report to the Committee.

Throughout September and early November, the Committee had previously discussed and agreed a number of sites for allocation in the district along with a number of sites that Committee agreed to 'move on' from for potential further consideration at a later date. The Assistant Director – Planning Strategy and Development Management advised Committee that it was now time to reconsider the 'moved on' sites to address the shortfall in housing allocations compared with the requirement figure.

Committee were reminded about the housing requirement set by Government and attention was drawn to paragraph 2.3 of the report that summarised the five options on how the council could achieve its overall numbers. Officers preferred Option B which meant that the 10% buffer would not apply for the whole of the Local Plan period of 2020 – 2042 but apply from 2024 – 2042 leaving a remaining housing requirement of 2,278 dwellings still needing to be allocated. It was noted that if all the 'moved on' sites detailed in the report were allocated the total allocation of dwellings would be 2,485 which would meet the shortfall and also give a small additional surplus of 177 dwellings.

The criteria applied by officers in respect of the 'moved on' sites for Committee's reconsideration were detailed in paragraph 5.2. Members noted that legal advice had been sought on a small number of new sites including some additional land in Honiton and the advice received was that if these sites were agreed for allocation they could be included in the Regulation 19 consultation which would give the public an opportunity to comment on them before it is submitted for examination.

The Assistant Director – Planning Strategy and Development Management invited Committee to consider Recommendation 1 before they started considering the 'moved on' sites as this would give Committee a clear picture on the number of dwellings needed to be allocated at this meeting.

Questions raised by Committee Members to Recommendation 1 and to the options set out in paragraph 2.3 of the report included:

- An update was sought on the likely publication of Government's new guidance on the National Planning Policy Framework. The Assistant Director – Planning Strategy and Development Management could not give a definitive answer but advised that it was expected by the end of this year.
- Several members sought clarification on the outcome for Option D and queried whether this option should be explored further so Committee were clear on whether this option could be ruled out. It was advised that although Option D would result in slightly less houses it would entail considerable risks including the need for a new start date which could be challenged at examination. Members noted that for Option D 18,731 dwellings were to be allocated compared with 20,182 for Option B. However Members were advised that this difference was misleading and arises because of the reduced plan period proposed in Option D whereas the annualised figure is only slightly lower.

Committee acknowledged the challenges ahead and sought guidance on a likely outcome if the Local Plan were to be found unsound at examination. The Assistant Director – Planning Strategy and Development Management advised they would need to start again at the Regulation 18 stage to reconsider options which could lead to the council having to deliver an extra 200 homes a year on top of the current figure due to proposed changes to the housing requirement figure arising from recent government consultation on changes to the planning system.

RESOLVED:
Members considered the options set out in paragraph 2.3 of the report for calculating future housing needs and noted the risks identified with each option. Members agreed that the housing needs be calculated based on Option B as set out in the report.

The Committee considered the proposed 'moved on' allocations for the district.

Lymp_07 Land at Courtlands Cross, Exeter Road, Lympstone
Proposed use: Housing
Number of dwellings: 100
Recommendation: Allocate

Thomas Shillitoe spoke in support of the allocation as it was situated on the north western side of Lympstone which was closer to the A376 and the town centre which he deemed a 'least worst' site.

Tracey Compton spoke on behalf of the residents of Exmouth and Lympstone who were opposed to the allocation and questioned why officers had recommended allocation of this unpopular site which local people had tried to protect and preserve to avoid coalescence.

Andrew McAusland, a resident of Courtlands Lane objected to the site as it was in a Coastal Protection Area saying it would be a blot on the landscape and have a negative impact on the wildlife as it was in close proximity to the estuary.

Councillor Susie Culhane, representing Lympstone Parish Council also objected to the site on heritage and landscape concerns and advised that flooding and water pollution were a critical issue in Lympstone.

Stuart Houlet, representing Waddington Park Limited advised committee that the development would be built on the less sensitive part of the site with an enhanced hedgerow on the northern side with access on the A376 via Thorn Farm to minimise the traffic impact on Courtland Lane.

Members considered residents concerns about the Green Wedge and it being in a Coastal Protection Area and acknowledged the difficult position as officers had recommended the site for allocation.

Inclusion of allocation was proposed by Councillor Kevin Blakey, seconded by Councillor Mike Howe.

Committee **endorsed to include Lymp_07 in the site allocation.**

Lymp_08 Land off Summer Lane, Exmouth
Proposed use: Housing
Number of dwellings: 14
Recommendation: Allocate

Officers advised that following Committee's concerns about the access to the site Devon County Highways had confirmed they had no concerns.

Thomas Shillitoe spoke in support of the allocation as it was a 'least worst' site, closer to the town centre than other sites and was not near the Pebblebed Heath.

Sophie Minter objected to the site and referred to the many empty homes in East Devon that could be renovated and used. She spoke about urban creep and that Lympstone and Exmouth need to be kept separated.

Susie Culhane representing Lympstone Parish Council objected to the site and read out the Council's Green Wedge policy. The Parish Council's concerns focused on wildlife and heritage impacts, loss of countryside and access onto the busy A376.

Councillor Ben Ingham proposed to move on to the next allocation, seconded by Councillor Colin Brown.

Committee **agreed to move on to the next site allocation.**

Exmo_04 Land at Marley Drive, Lympstone
Proposed use: Housing
Number of dwellings: 50

Recommendation: Allocate (southern parts of the site only)
(Exmo_04a allocated)

Thomas Shillitoe spoke in support reiterating his comments to the previous site.

Andrew Roberts objected to the site as it was unsustainable as the site would be too far away from the nearest facilities in Pines Road which would require car usage. He also raised access concerns onto Higher Marley Road. He referred to its ecological importance and that part of the site incorporates ancient woodland which should be protected.

Phil Morgan objected to the site advising that Marley Woods contained ancient woodland. He referred to a Government statement dated 14 January 2020 that advised that planning permission should be refused unless there were wholly exceptional reasons.

Committee considered advice about the distance from the site which showed the distance from the site through access from the bottom of Higher Marley Road was 0.6 miles to the nearest supermarket.

Following a request for an update on the current housing numbers the Committee was shown a spreadsheet of the total numbers agreed for each town and parish which was being updated as each site was agreed. Committee were advised that the current shortfall was 2,178 dwellings.

A proposal to move on to the next site allocation failed.

Inclusion of allocation was proposed by the Chair.

Committee **endorsed to include Exmo_04 in the site allocation.**

Lymp_09 Land fronting Hulham Road, Lympstone
Proposed use: Housing
Number of dwellings: 54
Recommendation: Allocate

Thomas Shillitoe spoke in support of the allocation as it was a ‘least worst’ site.

Sophie Minter objected to the site on unsustainability reasons and inadequate roads for the increase in traffic.

Helen Dimond objected to sites Lymp_09 and Lymp_10 raising concerns about the flood risk advising that any surface water runoff for both sites drains into the brook.

Andrew Minter speaking on behalf of Lympstone Parish Council, objected to the site advising that Hulham Road was too narrow and without pavements and also raised concerns about school capacity.

Stuart Houlet spoke on behalf of the landowner advising it would be an attractive development with increased landscape and no loss of trees, within close proximity to local amenities. He acknowledged the comments about Hulham Road and suggested that calming measures along Hulham Road could be introduced to increase footfall.

Committee discussed the unsuitability of Hulham Road.

Councillor Geoff Jung proposed to move on, seconded by Councillor Ben Ingham.

Committee **agreed to move on to the next site allocation**.

Lymp_10a and Lymp_10b Land off Hulham Road, Lympstone
Proposed use: Housing
Number of dwellings: 100
Recommendation: Allocate (southern part of the site labelled 10a on the map); Not to allocate 10b

Thomas Shillitoe spoke in support of the allocation as it was a 'least worst' site.

Andrew Roberts spoke against this site advising it should be excluded because of the access issues onto the fast-moving Hulham Road and which had no pedestrian footpaths.

Andrew Minter representing Lympstone Parish Council did not support the site allocation due to access issues, lack of services and infrastructure.

Stuart Houlet, on behalf of the landowner, spoke in support of the site allocation but acknowledged the direction of debate was not in support.

The Chair proposed to move on for Lymp_10a and Lymp_10b.

Committee **agreed to move on to the next site allocation.**

Lymp_17 Land at Marley House, Lympstone
Proposed use: Housing
Number of dwellings: 80
Recommendation: Not to allocate

Andrew Roberts did not support the site allocation due to concerns about access and the site being located in an unsustainable location.

Lympstone Parish Council supported officers recommendation not to allocate.

The Chair proposed to move on.

Committee **agreed to move on to the next site allocation.**

Exmo_47 Land to the west of Hulham Road, Exmouth
Proposed use: Housing
Number of dwellings: 15
Recommendation: Allocate

Thomas Shillitoe supported the site allocation.

Helen Dimond objected to the site allocation as it abuts the historic estate, A La Ronde Grade, a Grade II Listed Estate and close to two Grade I Listed Buildings, which will seriously harm the historic assets of these buildings.

David Matthews, who spoke on behalf of 3West advised this site would be an opportunity for small scale high quality development which was promoted by the NPPF.

A proposal to move on to the next site allocation failed.

Inclusion of allocation was proposed by Councillor Geoff Jung, seconded by Councillor Olly Davey.

Committee **endorsed to include Exmo_47 in the site allocation.**

Axmi_24 Land west of Prestalier Farm, Beavor Lane, Axminster
Proposed use: Housing
Number of dwellings: 29
Recommendation: Allocate

The Strategic Lead – Planning Strategy and Development Management updated Committee on the current number of dwellings allocated for Axminster advising that 727 houses had been allocated with a further 354 for consideration in the report.

Committee Ward Member referred to all the sites in Axminster. He did not support the allocation of site GH/ED/80 as it would need to go through another allocation for access, the topography and flooding issues were also addressed. He raised concerns about the number of houses Axminster had already been allocated and asked Committee to consider whether Axminster had already taken its fair share.

Councillor Ben Ingham proposed to allocate this site as it was not in a Coastal Preservation Area or National Landscape and officers had recommended allocation. Councillor Kevin Blakey seconded.

Committee **endorsed to include Axmi_24 in the site allocation.**

Axmi_11d Land on the south east side of Axminster
Proposed use: Housing
Number of dwellings: 331
Recommendation: Not to allocate

Councillor Paul Hayward proposed to move on, seconded by the Chair.

Committee **agreed to move on to the next site allocation.**

GH/ED/80 Prestaller Farm, Beavor Lane, Axminster
Proposed use: Housing
Number of dwellings: 225
Recommendation: Allocate

Councillor Ben Ingham proposed to allocate this site as it was not in a Coastal Preservation Area, Green Wedge or National Landscape and officers had recommended allocation. Councillor Olly Davey seconded.

Committee **endorsed to include GH/ED/80 in the site allocation.**

Axmi_22 Land east side of Axminster
Proposed use: Housing
Number of dwellings: 100
Recommendation: Allocate

Committee were reminded that at the previous meeting it had been endorsed for 55 dwellings and there is an opportunity for a higher density of 100 dwellings.

Councillor Ben Ingham proposed to allocate this site, seconded by Councillor Kevin Blakey.

Committee **endorsed to include Axmi_22 in the site allocation.**

Gitti_05a & Gitti_05b Land to the west of Hayne Lane, Honiton
Proposed use: Housing
Number of dwellings: 310
Recommendation: Allocate

Committee were reminded that the discussions from the last meeting was that a more comprehensive masterplan across the whole site could be a more sustainable development.

David Valentine representing Gittisham Parish Council did not support the allocation of Gitti_05b as it was in the National Landscape and he considered it unsustainable as it was a distance from schools which would require car usage.

Justin Lascelles representing Coombe Estate advised it was a good opportunity to deliver housing using the existing highway network and reassured Committee it would not be overbearing.

A statement was read out on behalf of Ward Member, Councillor Alasdair Bruce who had grave concerns over the involvement of the Coombe Estate, as the proposed masterplan had not been consulted on with affected parties and urged Committee to move on.

Councillor Mike Howe proposed to allocate this site, seconded by Councillor Ben Ingham.

Committee **endorsed to include Gitti_05a and Gitti_05b in the site allocation.**

Honi_12 Land to the south east of Cuckoo Down Lane, Honiton
Proposed use: Housing
Number of dwellings: 71
Recommendation: Allocate

Honiton Town Council and Ward Members, Councillor Jenny Brown and Councillor Roy Collins all supported the allocation.

The Chair proposed to allocate this site.

Committee **endorsed to include Honi_12 in the site allocation.**

GH/ED/39b Land south of Northcote Hill, Honiton
Proposed use: Housing
Number of dwellings: 100
Recommendation: Not to allocate

Councillor Serena Sexton representing Honiton Town Council advised that the site was suitable for development as it was not in a Green Wedge or National Landscape.

Councillor Ben Ingham proposed to allocate this site, seconded by Councillor Kevin Blakey

Concerns were raised about the landscape impact. Committee were reminded that as the site abutted the National Landscape regard to the setting of the National Landscape was required as land boundaries do not necessarily follow the topography referring to page 67 in appendix 1.

Committee **endorsed to includeGH/ED/39b in the site allocation.**

Honi_15 Land at Heathfield, Honiton
Proposed use: Housing
Number of dwellings: 140
Recommendation: Allocate

Committee were reminded that at the previous meeting there had been confusion to the site as two adjoining fields to the east and west had been put forward which was not made clear. Committee were advised that legal advice had been sought and it was confirmed that the whole site would be considered for allocation which would allow public consultation during the Regulation 19 stage.

Ray Levy objected to the site allocation advising that the site had received more objections than all of the Honiton and Gittisham sites combined and, if allowed to go ahead, would set a precedent for further development. This protected site should not be allocated as it is the main gateway to the National Landscape to and from Sidmouth.

Robert Fowles objected to the site allocation on visibility concerns as the site rises steeply and would be highly visible from the edge of the existing estate and from the gateway to Honiton and surrounding area referring to the NPPF policy 77.

Councillor Valentine representing Gittisham Parish Council referred to a previous planning application that was refused in 2015 in which the reasons for refusal were that development should only be granted in exceptional circumstances where there is public benefit. Nothing has changed since then apart from the council having to battle with housing numbers.

Councillor Serena Sexton advised that Honiton Town Council did not support the site allocation.

Ward Member, Councillor Jenny Brown did not support the allocation as it would constitute major development and would have an adverse impact to the town's motto 'town in the countryside'.

Ward Member, Councillor Roy Collins objected to the site allocation.

Councillor Geoff Jung proposed to move on, seconded by Councillor Paul Hayward.

Committee **agreed to move on to the next site allocation.**

Councillor Bethany Collins left the chamber for the next site allocation and did not take part in discussions or vote.

Honi_18 Land at Kings Road, Hale Close, Honiton
Proposed use: Housing

Number of dwellings: 136
Recommendation: Not to allocate

Committee were reminded that this was a new site that had come in through the Regulation 18 consultation and officers recommended not to allocate due to issues with access.

Simon Coles spoke on behalf of Carney Sweeny and asked Committee to allow more time to address the access issues advising that the scheme had not been assessed against the correct National Highways safety standards and if it had it would have produced a different result which would create a betterment compared to the existing junction arrangements. In response officers advised that National Highways had been contacted about whether a safe access could be obtained into the site but a response has not been received yet and, on that basis, officers cannot recommend allocation.

Clarification was sought about whether delegated authority could be given if a satisfactory response was received from National Highways. In response Committee were advised if Members were happy to allocate it delegated authority could be given to the Assistant Director – Planning Strategy and Development Management in consultation with the Chair to remove the site if National Highways maintain their objection.

Clarification was sought about whether the site was in the National Landscape as detailed in the presentation. Officers apologised for the incorrect information and confirmed the site was adjacent to the National Landscape.

Councillor Kevin Blakey proposed to allocate the site, seconded by Councillor Geoff Jung.

Committee **endorsed to include Honi_18 in the site allocation with delegated authority to the Assistant Director- Planning Strategy and Development Management in consultation with the Chair of Strategic Planning to remove the site if National Highways maintained their objections about the access.**

Honi_05 Land to the north and south of King Street, including former Foundry Yard, Honiton
Proposed use: Housing
Number of dwellings: 40
Recommendation: Not to allocate

Honiton Town Council did not agree with the officer recommendation not to allocate as they considered the site was suitable for development.

Ward Member, Councillor Roy Collins, was disappointed with the officer recommendation as it was a brownfield site and would be suitable for flats or apartments. He advised that the site had not flooded since 1968.

Officers advised that the site was in the highest risk flood zones which would not be easy to overcome.

Councillor Mike Howe proposed to move on, seconded by Councillor Paul Hayward.

Committee **agreed to move on to the next site allocation.**

Otry_10 Land to north and south of Salston Barton, Ottery St Mary

Proposed use: Housing
Number of dwellings: 20
Recommendation: Allocate (northern part outside of floodplain)

Ward Member, Councillor Peter Faithfull preferred this site as it was outside of the 'Built up Area Boundary' and the 'Green Wedge' with no visual impact on the surrounding area. He raised concerns about the poor access onto Strawberry Lane and the impact on surrounding residents.

A statement was read out on behalf of Ward Member, Councillor Vicky Johns, who did not support the site allocation on a number of issues, which included the inadequate road network, the distinct lack of pavements and accessibility.

Some Committee Members were conflicted with this site due to the proposed access.

Councillor Bethany Collins proposed to allocate the site, seconded by Councillor Ben Ingham.

Committee **endorsed to include Otry_10 in the site allocation.**

GH/ED/27 Land south of Strawberry Lane, Ottery St Mary
Proposed use: Housing
Number of dwellings: 60
Recommendation: Allocate

James Culshaw spoke on behalf of KCS Development supporting the allocation which could deliver affordable and local housing with a CIL contribution, contributions to healthcare projects and improved pedestrian crossings onto Strawberry Lane.

Ward Member, Councillor Peter Faithfull, suggested that if the site was proposed for allocation he would like to see improvements to Strawberry Lane as some of the road is single vehicle width.

A statement was read out on behalf of Ward Member, Councillor Vicky Johns, who objected to the site allocation due to the loss of grade 3 agricultural land and the lack of a safe access from the site to the town.

Councillor Mike Howe proposed to allocate the site, seconded by Councillor Yehudi Levine.

Committee **endorsed to include GH/ED/27 in the site allocation.**

Otry_01a Barrack Farm, Ottery St Mary
Proposed use: Housing
Number of dwellings: 75
Recommendation: Allocate

Committee were reminded that the site had been brought back to committee due to concerns about the distance from the town and the landscape impact. Members were also reminded that at a previous meeting the site Otry_09 had been allocated which extended further to the west than this site.

Ward Member, Councillor Peter Faithfull, objected to the site allocation as it was in a Green Wedge and would be visible from the town.

A statement was read out on behalf of Ward Member, Councillor Vicky Johns, who objected to the site allocation due to the loss of grade 3 agricultural land and because it lies within the Green Wedge, which should be protected.

Councillor Jess Bailey supported the objections raised about the site being too far for residents to access services and proposed to move on, seconded by Councillor Bethany Collins.

Committee **agreed to move on to the next site allocation.**

GH/ED/26 Land west of Cadhay Lane, Ottery St Mary
Proposed use: Housing
Number of dwellings: 200
Recommendation: Not to allocate

Ward Member, Councillor Peter Faithfull, strongly objected to the site allocation as it would protrude a long distance into the Green Wedge and would be visible from many directions.

A statement was read out on behalf of Ward Member, Councillor Vicky Johns, who objected due to the lack of safe walking or cycling access to the town, lack of infrastructure and the site sits within the Green Wedge.

In view of the comments made to the previous site the Chair proposed to move on.

Committee **agreed to move on to the next site allocation.**

Seat_15 White Cross, Colyford Road, Seaton
Proposed use: Housing
Number of dwellings: 36
Recommendation: Not to allocate

Councillor Geoff Jung proposed to move on, seconded by Councillor Bethany Collins.

Committee **agreed to move on to the next site allocation.**

Beer_03 Land at Quarry Lane, Beer
Proposed use: Housing
Number of dwellings: 15
Recommendation: Not to allocate

Ward Member, Councillor John Heath objected to the site allocation as it was less than 600m from the Beer Quarry Caves which housed protected bats as well as other wildlife living in the hedgerows which would need to be removed to accommodate building.

The Chair proposed to move on.

Committee **agreed to move on to the next site allocation.**

Brcl_12a and Brcl_12b Land west of Whimple Road, Broadclyst
Proposed use: Housing
Number of dwellings: 100
Recommendation: Allocate

A statement was read out on behalf of Broadclyst Parish Council opposing to the site allocation stating that the large scale proposed failed to respect the established vision for Broadclyst's future and that it risked creating an unsustainable precedent for future allocations. It further stated that should the Committee be mindful to allocate, the parish council request:

1. Separate access to the employment area
2. Connecting foot/cycle links to the village
3. Improvements to existing footpath
4. Strong local connections for affordable units
5. Protection of land allocated for self-build plots to meet local demand.

Alex Bullock on behalf of the landowner spoke in support of the site allocation which would provide 100 dwellings and a site for employment space which would create jobs for local people. In addition a children's play area and areas of public open space will be included as well an informal and semi-natural green space.

Concerns were raised about the size of the allocation as it was felt it would swamp Broadclyst village. In response officers presented an indicative layout of the site to demonstrate the appropriate scale of growth.

The Chair proposed to allocate the site.

Committee **endorsed to include Brcl_12a and Brcl_12b in the site allocation.**

Budl_01 Land adjacent to Clyst Hayes Farmhouse, Budleigh Salterton
Proposed use: Housing
Number of dwellings: 50
Recommendation: Not to allocate

Helen Dimond spoke in support of the allocation as it had a good range of facilities and services that could accommodate more dwellings and emphasised the need to find more suitable sites in Budleigh Salterton. It was questioned why officers recommended not to allocate when the site was surrounded by houses.

Iestyn John spoke on behalf of the landowner advising that the location of the site to deliver 50 houses could be achieved in a satisfactory manner which would protect the character of the Natural Landscape and the area around it.

Ward Member, Councillor Melanie Martin did not support the site allocation as the site was Grade 1 agricultural land on a steep slope which would have an overbearing and intrusive effect on the existing houses.

Following concerns about the sites proximity to services officers reminded members that the recommendation was not to allocate due to large parts of the site being in the National Landscape and that access could only be achieved in a sensitive part of the site.

Clarification was sought on whether the site was within the National Landscape as the table in the presentation had identified it was not. Members were advised that all Budleigh Salterton was in the National Landscape

A proposal to move on to the next site allocation failed.

Inclusion of allocation was proposed by Councillor Geoff Jung, seconded by Councillor Olly Davey.

Committee **endorsed to include Budl_01 in the site allocation for 50 homes with delegated authority to the Assistant Director – Planning Strategy and Development Management in consultation with the Chair to determine its location and extent.**

Budl_02 Land at Barn Lane, Knowle, Budleigh Salterton
Proposed use: Housing
Number of dwellings: 35
Recommendation: Allocate

The Chair proposed to allocate the site.

Committee **endorsed to include Budl_02 in the site allocation.**

Budl_03 Land at Barn Lane, Knowle, Budleigh Salterton
Proposed use: Housing
Number of dwellings: 44
Recommendation: Not to allocate

Helen Diamond supported the site if it was developed alongside Budl_02 which would provide better access to the school and town

Iestyn John supported the site that would work better with Budl_02 to provide a connecting footpath to the existing built-up area to make a very sustainable site which could provide affordable housing.

Ward Member, Councillor Melanie Martin did not agree with officers views to allocate as she had concerns with the access and it would be highly visible.

A proposal to endorse the site for allocation failed.

The Chair proposed to move on.

Committee **agreed to move on to the next site allocation.**

Coly_02b Land at Hillhead, Colyton
Proposed use: Housing
Number of dwellings: 24
Recommendation: Allocate

Sim Blight on behalf of Acorn Property Group supported the site allocation which would be adjacent to Coly_02a which Members had already agreed to allocated.

Councillor Alison Stenning spoke on behalf of Colyton Parish Council objecting to the site allocation as the field was sacred to the residents of both Colyton and Colyford for walking and tranquillity and it was also suggested that the land above Burnfield Road was used by endangered bats.

Councillor Ben Ingham proposed the site for allocation as the adjacent site had already been proposed for allocation. This was seconded by Councillor Mike Howe.

Committee **endorsed to include Coly_02b in the site allocation.**

Coly_06a Land to the south and east of Colyton (adjacent to Peace Memorial Playing Fields, Coly Road), Colyton
Proposed use: Housing
Number of dwellings: 12
Recommendation: Allocate

Members were reminded that the site allocation had been brought back to Committee following a request made by Members that sought confirmation from Devon County Council about the requirement for a school. Officers referred to the response detailed in the report that advised DCC had no current plans to build an additional school.

Councillor Alison Stenning spoke on behalf of Colyton Parish Council objecting to the site allocation advising that the site was the only site remaining that could accommodate a school if it was required in the future.

Following discussions a proposal to move on failed.

Councillor Mike Howe proposed to endorse the site allocation, seconded by Councillor Bethany Collins.

Committee **endorsed to include Coly_06a in the site allocation.**

GH/ED/72 Land at Meeting Lane, Lympstone
Proposed use: Housing
Number of dwellings: 42
Recommendation: Allocate

James Moffatt objected to the site allocation raising concerns about poor access to local facilities which would require the need to travel by car and that it was in the Coastal Protection Area which needed to be preserved and protected.

Helen Dimond objected to the site allocation as it had 7 Grade II Listed Buildings within the site and referred to the ancient Devon Banks and hedgerows that would be destroyed if the development was to go ahead.

Woodbury Parish Council supported the site allocation.

Oliver Keates speaking on behalf of the landowner supported the allocation as the site was not in a National Landscape nor a Green Wedge. He advised that although it was in a Coastal Protection Area referring to Strategy 44 it was important for Members to note that the site has not visual connection to the sea or Exe Estuary and that it would be a discreet development.

A proposal to move on failed.

Councillor Kevin Blakey proposed to endorse the site allocation, seconded by Councillor Paul Hayward.

Committee **endorsed to include GH/ED/72 in the site allocation.**

GH/ED/74 Land at Strawberry Hill, Lympstone
Proposed use: Housing

Number of dwellings: 141
Recommendation: Not to allocate

Helen Dimond objected to the site allocate on flooding concerns advising any development on this site would be disastrous.

Andrew Minter, representing Lympstone Parish Council did not support the site allocation as it was within a flood zone and therefore would be unsuitable for development.

The Chair proposed to move on.

Committee **agreed to move on to the next site allocation.**

Wood_10 Land at Gilbrook, Woodbury
Proposed use: Housing
Number of dwellings: 60
Recommendation: Allocate

A statement was read out on behalf of Andy Douglas objecting to the site allocation.

Cheryl McGauley could not support the current site allocation on the flooding issues but advised Members that she had met with the developer who had discussed what could be changed to make it a suitable development.

Woodbury Parish Council did not support the allocation due to the poor road layout which required a comprehensive strategic traffic plan and that part of the site was within flood zone 3.

David Matthews spoke on behalf of the landowners and developers supporting the site allocation highlighting its potential including social and economic benefits, highway network improvements and public open space.

The Chair proposed to endorse the site allocation.

Committee **endorsed to include Wood_10 in the site allocation.**

Wood_04 Land off Globe Hill, Woodbury
Proposed use: Housing
Number of dwellings: 28
Recommendation: Not to allocate

Woodbury Parish Council did not support the site allocation highlighting to Members that the site was situated in a high-pressure gas pipeline zone and raised safety concerns with the access.

Councillor Geoff Jung proposed to move on, seconded by Councillor Todd Olive.

Committee **agreed to move on to the next site allocation.**

Wood_11 Land at the rear of Escot Cottages, Broadway, Woodbury
Proposed use: Housing
Number of dwellings: 5
Recommendation: Not to allocate

Woodbury Parish Council did not support the site allocation raising concerns about the safety of the access onto the A3179 due to its narrow entrance and its visibility issues.

The Chair proposed to move on.

Committee **agreed to move on to the next site allocation.**

Wood_12 Land to the east of Higher Venmore Farm, Woodbury
Proposed use: Housing
Number of dwellings: 141
Recommendation: Not to allocate

Richard House, the landowner supported the site allocation due to its location to the centre of Woodbury and that it would abut sites that had already been allocated. He advised that in light of the feedback received there could be potential that the northernmost part of the site could be allocated for a smaller development which could contribute to the housing shortfall.

Woodbury Parish Council did not support the site allocation and advised if Members were in mind to allocate part of the land for a smaller development they insisted that the remaining site be given as a SANGS area.

The Chair proposed to move on.

Committee **agreed to move on to the next site allocation.**

Wood_37 Cricket Field off Town Lane, Woodbury
Proposed use: Housing
Number of dwellings: 81
Recommendation: Not to allocate

Woodbury Parish Council did not support the site allocation as the land was better used as a valuable amenity space featuring a dedicated community orchard which would impact the wellbeing of residents. Access to the primary school would be dangerous due to its narrow road and no pavements.

The Chair proposed to move on.

Committee **agreed to move on to the next site allocation.**

Wood_20 Land at Town Lane, Woodbury
Proposed use: Housing
Number of dwellings: 28
Recommendation: Allocate

Woodbury Parish Council did not support the site allocation due to the lack of pavements and narrow lane which included pinch points adding to the lack of visibility.

Iestyn John spoke on behalf of the landowner advising that the site had potential to be developed out without any harm to the cricket pitch which would be protected. The parish council's concerns about pedestrian access were acknowledged with an observation that there were pavements a short distance away in both directions.

The Chair proposed to endorse the site allocation.

Committee **endorsed to include Wood_20 in the site allocation which included a casting vote from the Chair.**

Wood_23 Ford Farm, Woodbury
Proposed use: Housing
Number of dwellings: 18
Recommendation: Not to allocate

Woodbury Parish Council did not support the site allocation as its location would pose significant danger to pedestrians as it was in a isolated location some distance from the village.

Councillor Geoff Jung proposed to move on, seconded by Councillor Kevin Blakey.

Committee **agreed to move on to the next site allocation.**

Wood_24 Land north east of Webbers' Meadow, Castle Lane, Woodbury
Proposed use: Housing
Number of dwellings: 35
Recommendation: Not to allocate

Helen Gottschalk objected to the site allocation as it was outside the village area boundary and had concerns about the sewage network with the increased number of houses proposed. She also raised concerns about Castle Lane not being able to cope with the extra vehicles.

Councillor Steve Parks, speaking on behalf of Woodbury Parish Council objected to the site allocation raising concerns about the high level of sensitivity of the site.

Councillor Geoff Jung proposed to move on, seconded by Councillor Ben Ingham.

Committee **agreed to move on to the next site allocation.**

Wood_47 Land at Pound Lane, Woodbury
Proposed use: Housing
Number of dwellings: 59
Recommendation: Not to allocate

Woodbury Parish Council did not support the site allocation as the development would have a negative impact on the landscape and would result in the loss of Grade II agricultural land.

The Chair proposed to move on.

Committee **agreed to move on to the next site allocation.**

Char_04b Land off Green Lane, Chardstock
Proposed use: Housing
Number of dwellings: 15
Recommendation: Allocate

Ward Member, Councillor Duncan Mackinder did not support the site allocation advising that Chardstock was not a sustainable community and not suitable to larger scale developments referring to the already endorsed allocation of Char_04a.

Councillor Paul Hayward proposed to move on, seconded by Councillor Ben Ingham.

Committee **agreed to move on to the next site allocation.**

Char_07 Land at North west edge of Chardstock
Proposed use: Housing
Number of dwellings: 9
Recommendation: Not to allocate

Ward Member, Councillor Duncan Mackinder sought clarification on the officer recommendation as the presentation showed it was recommended for allocation. Officers confirmed the site was not recommended for allocation. Councillor Mackinder supported the officer recommendation not to allocate.

Councillor Paul Hayward proposed to move on, seconded by Councillor Ben Ingham.

Committee **agreed to move on to the next site allocation.**

Attendance List

Councillors present:
B Bailey
J Bailey
K Blakey
C Brown
B Collins
O Davey
P Fernley
P Hayward
M Howe (Vice-Chair)
B Ingham
G Jung
Y Levine
T Olive (Chair)
H Parr

Councillors also present (for some or all the meeting)
A Bailey
I Barlow
J Brown
C Burhop
R Collins
P Faithfull
J Heath
J Loudoun
D Mackinder
M Martin
K Bloxham

Officers in attendance:
Ed Freeman, Assistant Director Planning Strategy and Development Management
Damian Hunter, Planning Solicitor
Wendy Harris, Democratic Services Officer
Matthew Dickins, Planning Policy Manager
Thea Billeter, Cranbrook New Community Manager

Chair ..... Date: .....

EAST DEVON DISTRICT COUNCIL

Minutes of the meeting of Strategic Planning Committee held at Council Chamber, Blackdown House, Honiton on 11 December 2024

Attendance list at end of document
The meeting started at 9.03 am and ended at 3.55 pm

245 Minutes of the previous meetings

The minutes of the previous meetings held on 1 November, 5 November, 22 November and 29 November 2024 were confirmed as true records.

246 Declarations of interest

Minute 249. East Devon Local Plan - approval for Regulation 19 consultation.
Councillor Eleanor Rylance, Affects Non-registerable Interest, Broadclyst Parish Councillor and a resident of Broadclyst.

Minute 249. East Devon Local Plan - approval for Regulation 19 consultation.
Councillor Mike Howe, Affects Non-registerable Interest, Village shop owner.

Minute 249. East Devon Local Plan – approval for Regulation 19 Consultation
In accordance with the Code of Good Practice for Councillors and Officers dealing with planning matters as set out in the constitution Councillors Kevin Blakey, Bethany Collins, Paula Fernley, Geoff Jung and Eleanor Rylance advised lobbying in respect of Strategic Policy SD07: Development at Broadclyst.

247 Matters of urgency

There were no matters of urgency.

248 Confidential/exempt item(s)

There were no confidential or exempt items.

249 East Devon Local Plan - approval for Regulation 19 consultation

The Chair welcomed everyone to the meeting and invited the public that had registered to speak on chapters 1 to 5 to address the Committee.

Councillor Martin Smith on behalf of Feniton Parish Council referred to the inconsistences between the Local Plan's vision and Strategy Policy SP01: Spatial Strategy paragraph (e) referring to the removal of any reference to 'meeting local needs' which the parish council believed was to overcome the need for more housing in the tier 4 settlements advising that Feniton had the highest number of housing allocations of any tier 4 settlement and 4.6 hectares of employment use which was unsustainable development.

John Hamill spoke about chapter 4 referring to a specific site allocation in the Ting Tong area which Committee had proposed for site allocation. He explained the reason there had not been any resident representation at the meeting on 3 September was because

the site had been recommended 'not for allocation' and highlighted that now that the site had been allocated it now had the potential for development of over 1,000 houses. Mr Hamill asked the Committee to think carefully about the site allocation as the infrastructure would not be able to cope.

Barbara Whetter spoke about chapter 5 and questioned why there had been so much development proposed in Feniton especially as it was a small rural village, dependent on car usage on unfit and congested roads.

Lesley Oates spoke about chapter 5 and advised that although she acknowledged the need for more affordable housing and more employment opportunities, she felt dismayed about the disproportionately large level of development suggested in certain rural areas as these villages did not have the infrastructure to support this. She referred to Richard Foord MP's speech in the House of Commons on 9 December where he advised that 57% of East Devon was National Landscape which had an unfair burden on the council to achieve housing targets on the remaining 43%. Lesley Oates suggested that the council should be fighting back at government rather than shoehorning developments into ridiculous spaces.

Dr Lorna Mason, speaking on behalf of Jill Murdoch and Bill Martin raised concerns that the amount of development proposed for the area would destroy the village's unique character which local people did not want. Dr Mason questioned the lack of transparency from the closed-door Member Working Group meetings and questioned who would profit from the sale of land in East Devon and whether Committee Members were being influenced by developers with financial incentives.

Dr Mason mentioned for public record that 370 people had commented in the previous consultation that they were unhappy or dissatisfied with development in Broadclyst. She urged Members to pay attention to what Broadclyst residents were saying and pointed out that the Committee had voted to include the most objected to site and now have increased the allocation above what officers and the parish council considered would be detrimental.

The Chair responded to the accusations and advised Dr Mason that all Members were accountable and responsible by law for declaring their own financial interests and if there was evidence that this was not the case it should be brought forward.

Councillor Richard Grainger, representing Ottery St Mary Town Council read out a letter that had been sent to East Devon District Council on 11 November that addressed the town council's concerns about the process of identifying sites for development under the East Devon Local Plan and that the town council fully supported the views expressed by Lympstone Parish Council as they reflected their own concerns about the undue pressure this process has placed on local councils including Ottery St Mary as well as the negative impact it has had on their communities. It also addressed concerns about the poorly managed process and the lack of communications between EDDC and local councils which displayed a lack of empathy, leadership and understanding from EDDC leading to a feeling of frustration and betrayal in smaller communities where the view of residents appear to have been ignored or dismissed.

Thomas Shillitoe raised concerns about the time it has taken East Devon District Council to keep up the administration of the Local Plan with emails not being answered and an out-of-date website that has created confusion and a feeling of being completely in the dark about what is going on. He suggested that the rushed information about the Exmouth sites had contained errors and omissions that had resulted in Members making

a decision based on incorrect information and referred to an incorrect map that did not detail the European Designations of SAC and SPA that had resulted in Members supporting site Exmo_20, a development of 700 homes and questioned how Members could make informed decisions without this important information.

Duncan Cherrett, spoke about chapter 5 and a contradiction between our towns and villages and the Council's aspirations about climate change of protecting the well-being of existing residents. He questioned some decisions made by Members for sites that were close to heritage sites or that did not have sufficient infrastructure highlighting the lack of detail and facts centred on these decisions. He referred to an allocation of 142 houses in a historic village near to Grade I National Trust Listed Buildings and highlighted there was not any factual information about the impact of flood risk or drainage issues and advised that members of the public need to see evidence that this Council has pressed hard to ensure developers present evidence to mitigate these harms.

The Chair reassured members of the public that had spoken this morning that the Council was unquestionably concerned with everything that had been raised and clarified that all these concerns would be looked at through detailed evidence during the planning application stage and gave reassurance that additional steps would also be taken with any planning applications within specific designations around critical flood risk areas or flood zone areas.

The Chair of the Council, Councillor Eleanor Rylance, firstly paid tribute to Members of the Strategic Planning Committee for their attendance and contribution during the very long meetings over the past six months in order to achieve the new government's housing targets. She highlighted that development was needed for our natural population growth with a need to focus on delivering genuine affordable housing in our towns and villages so that the younger population can afford to move out and start their adult life close to their families and without them being 'ghettoized' into certain areas giving Cranbrook as an example. She drew Committee's attention to the infrastructure and asked that Members recognise that this has historically been slow in coming forward and should be delivered contemporaneously with any development.

The Committee considered the report that sought approval of the Regulation 19 consultation of the Local Plan. The Assistant Director – Planning Strategy and Development Management advised it was hoped that 'stage 1' of the consultation would start in January 2025, but this was dependent on the government's imminent changes to the National Planning Policy Framework and its impact on planning policy and housing numbers. The 'stage 2' consultation to consider the new town masterplan would start in May 2025 and both collated consultations would be submitted to the Planning Inspector in the Autumn 2025, followed by the Inspector's Public Hearings in late 2025/early 2026 with the adoption in late 2026/early 2027.

The Committee's attention was drawn to the housing numbers and trajectory graph which helped Members to understand how the Council would get to a five-year housing land supply at the point of the adoption of the Plan.

The Committee's attention was also drawn to the changes that had been made to some local plan chapters as detailed in the report. This was to ensure greater consistency of approach throughout the document and to address matters on potential development allocation sites that had been agreed by Committee at previous meetings.

These sites included:

- Budl_01 – land south of Bedlands Lane and west of Dark Lane, Budleigh Salterton.
- Honi_18 – land at Kings Road, Honiton.
- Otto_02 – land adjacent to the North Star, Otterton

The Chair invited Members to comment on each chapter.

Chapter 1 Introduction

- Update the map to change East Devon AONB to National Landscapes.

Chapter 2 The Vision

- Clarification was sought on the description 'modest sensitivity' in paragraph 1.6.

Chapter 3 The Spatial Strategy

- Page 25 – West Hill total housing requirement numbers are incorrect and should be less than 60.
- Page 25 – Feniton numbers are incorrect.
- The Assistant Director – Planning Strategy and Development Management advised that the numbers would be revisited to ensure they were correct.
- The wording for Strategic Policy SP01 (b) does not follow East Devon's vision. In response the Assistant Director – Planning Strategy and Development Management advised that additional wording could be inserted to make it clearer that it refers to 'existing settlements'.
- Strategic Policy SP07 – the wording needs to be amended to address how are we going to engage with infrastructure providers to deliver in a timelier manner to avoid the same mistakes as at Cranbrook.

Members attention was drawn to a proposed new policy on phased developments and the Chair invited comments:

- There is a need to be specific about cycleways and multi-use trails with an agreement from Highways about what they should be named.
- Reference was made about ransom strips, and it was questioned whether the wording of the policy would deliver the outcomes the council sought.
- The policy should direct developers from the outset and should hold developers to account. The policy needs to be broken down and reformatted to make it easier to read.
- Clarification was sought about whether the Committee would be able to see the revised wording before it went out for consultation. In response the Committee were advised that it would depend on the government's publication of the new NPPF and if there was time the revised new policy would be brought back to Committee in the new year before the Regulation 19 went out for consultation.

Chapter 4 Development at the West End

- Strategic Policy WS01 – clarification was sought about why the policy did not detail the different types of affordable housing for the new town. The Assistant Director – Planning Strategy and Development Management advised the mix of tenure types of housing was set out in the policies in the housing chapter.
- It was suggested to set a high target of 70% mixed tenure to achieve our affordable housing needs earlier.
- It was suggested that as the new town may have a different requirement of affordable housing it would be better to change the figure to XX as it is still to be determined. The Assistant Director – Planning Strategy and Development

Management advised he was happy to change to XX and that it would be determined through the second phase of the Regulation 19 consultation.

- Strategic Policy WS02 – clarification was sought about whether the Committee were happy with the proposed density of the new town. In response it was advised the masterplan would set out specific areas of density which would be followed by the planning applications to determine the natural flow of density.
- Population figures are missing from the report.
- A suggestion was proposed to produce a map of the West End to define the area. Committee were advised that clarity of the West End had been provided via text instead of a map as this would create challenges to try and define the boundaries.

Members attention was drawn to a proposed further amendment to Policy WS01, and the Chair invited comments:

- Mistakes have been learned from the experience from Cranbrook. This is a good step moving forward with the new town.
- Although the Stewardship Statement is well worded it does not however go far enough to explain what it will control. Stronger words are needed to ensure that East Devon District Council will control what is built and when it will be built.
- It was suggested that the wording for b) was too restrictive and narrow and should be broadened to include commercial spaces etc. In response the Assistant Director – Planning Strategy and Development Management explained that it was left deliberately broad to include community spaces such as town centre spaces and employment spaces and questioned whether being too precise in the wording would start to exclude these types of spaces but advised that he was happy to look at the wording if the Committee wished.
- Reference was made to the Stewardship Statement and the need to ensure that there is suitable wording to make sure it remains in public ownership and should be managed by the newly formed town council. The Assistant Director – Planning Strategy and Development Management advised that suitable wording could be added to the explanatory text that would explain about the council's aspirations about what model it would like to see.

<u>Chapter 5 Development in the towns and villages</u>
Members considered the following two allocations that officers had raised concerns about:

Budl_01 Land south of Bedlands Land and west of Dark Lane
Committee were reminded that as Budleigh Salterton had taken a disproportionately low number of houses Committee had resolved to allocate up to 50 houses on the north eastern corner of this site with delegated authority to the Assistant Director – Planning Strategy and Development Management in consultation with the Chair to determine the boundary. Following discussions with the developers it has now been proposed for development of 53 houses across 3 portions of the site which officers feel has a disproportionately high landscape impact and would impact the National Landscape and Green Wedge and therefore does not justify development and the recommendation is to not proceed with the site allocation.

RESOLVED:
To not allocate land at Budl_01 for the reasons set out in the report, notwithstanding the previous resolution to make an allocation with the details delegated to the Assistant Director – Planning Strategy and Development Management and the Chair of Strategic Planning Committee.

Otto_02 Land adjacent to the North Star
Committee were reminded that as the site was within a flood zone it would need to go through a stage 2 strategic flood risk assessment which would cost over £10,000 and delay the Local Plan process so the recommendation is to not proceed with the site allocation. Committee were advised that in principle as the site was within the settlement boundary of Otterton it could still come forward as a planning application.

RESOLVED:
To not allocate Otto_02 in light of the need for additional work to demonstrate the nature and extend of flood risk at the site noting that it has already been agreed for inclusion within the settlement boundary.

Comments on chapter 5 included:

- The wording about the location of the school in Strategic Policy SD27 Development at Tipton St John is incorrect. Officers advised the wording would be amended.
- The plan for Strategic Policy SD04 Ottery St Mary and its future development – Otry_09 Land at Thorne Farm is incorrect as still shows shading for just housing development. The plan should show a mixed-use site (education and housing).
- The wording for Strategic Policy SD01 Exmouth and its future development – Exmo_20 Land at St Johns does not mention the Pebblebed Heaths or the 400m exclusion zone which needs to be included. Officers agreed that a sentence would be added so that any allocation would need to comply.
- 0.1 hectare of employment land in Brcl_09 has been removed from Strategy Policy SD07 Development in Broadclyst. Officers advised this was an error and that it would be included.

The Chair welcomed everyone to the afternoon session and invited the public that had registered to speak on chapters 6 to 15 to address the Committee.

Thomas Shillitoe addressed the Committee about the proposed development immediately adjacent to the Pebblebed Heaths which was a SAC and SPA referring to chapter 13 Our Outstanding Biodiversity and Geodiversity. He referred to Policies PB01 Habitats Regulations Assessments Protection of Internationally and Nationally important wildlife sites, PB03 Protection of irreplaceable habitats and important features and PB04 Habitats Regulations Assessment raising concerns that recreational impacts were already having a detrimental impact on ground nesting birds and there was a need to demonstrate that the development proposed cannot be located on alternative sites that would cause less harm or that suitable compensation strategies were put in place.

Councillor Chris Burhop, Ward Member for Newton Poppleford & Harpford reminded Committee of the Strategic Planning Committee meeting on 22 November 2024 where the Newton Poppleford settlement boundary was considered and Committee had resolved to delegate authority to the Assistant Director – Planning Strategy and Development Management and the Chair of Strategic Planning to incorporate more of the western side. Councillor Burhop explained that the village centre and village facilities were all on the eastern side of the village and by incorporating land on the western side he explained that this would not be accessible to the centre of the village as it did not have any safe footpaths. He addressed the possibility of a footpath being created for the proposed allocations Newt_04 and Newt_05 did not have a footpath but emphasised this may or may not happen. Although he concurred with officers' recommendations for the two site allocations, he raised concerns that for any reason these two developments did not go ahead these development sites on this side of the village would be inaccessible

and therefore asked Committee to repropose the original submission to go forward into the Regulation 19 consultation.

During discussions some Members concurred that unless the footpath was installed the western side of the village would be unsafe and there was nothing to confirm at this stage that the footpath would happen. It was suggested that a condition could be imposed to ensure that no development could take place until there was a suitable footpath.

Following legal advice from the Planning Solicitor the Chair explained that the Constitution on page 118, Part 4, paragraph 13.1 states that 'A motion or amendment to rescind a previous decision made at a meeting of the council within the past six months cannot be moved unless the notice of motion is signed by at least 15 Members'.

During discussion it was then questioned whether Part 4, paragraph 13.1 of the Constitution related to Full Council decisions, rather than Strategic Planning Committee. The Planning Solicitor advised that the Rules of Procedure apply to all meetings of Committees as set out at the beginning of Part 4 of the Constitution on page 109 which states that 'Rules 4 to 26 (except where clearly inappropriate – for example Standing Order 18.1) shall apply to meetings of Committees. The word 'Committee' includes Cabinet, the Overview and Scrutiny Committees and all the bodies referred to in Article 8 of this Constitution' which includes Strategic Planning Committee.

The Planning Solicitor also advised in relation to Article 15 of the Constitution that a motion to suspend the Rules of Procedure could not be moved without notice unless at least one half of the whole number of Councillors entitled to attend the Committee were in attendance. As more than half of Committee were present, the Planning Solicitor advised that it would be possible to suspend the Constitution but questioned whether such a suspension would be proportionate taking account of the purposes of the Constitution set out in Article 1.

Having considered the legal advice Councillor Jess Bailey proposed to suspend the constitution, seconded by Councillor Dan Ledger and proposed a motion to rescind the previous resolution and to include the original boundary as proposed by officers to not include Newt_04 and Newt_05 due to road safety issues.

A vote took place and the proposal was not approved by the Committee.

Chapter 6 Mitigating Climate Change

- Why will there not be solar panels on all the roofs of new houses. In response Committee were notified that it was due to viability and following advice from SWEEG it was advised to follow the route of being PV ready which would achieve the best outcomes and help achieve zero carbon.

Chapter 7 Adapting to Climate Change

No comments.

Chapter 8 Meeting Housing Needs

- The Council should be much stricter on developers providing affordable housing and to include a mixed tenure.
- 70% of mixed tenure is possible.
- There is a need to increase the number of council owned properties to improve our own housing stock.

- Need to address specific housing needs and the number of bedrooms. It was advised that the local housing needs assessment had shown that 75% of the district was in need of 3-4 bedrooms and therefore the Committee had agreed it was better to have a policy that referred to an appropriate mix of housing based on evidence.
- Why is there a suggestion for less affordable housing in Axminster? It was advised that the viability work had shown that the development values were lower and therefore it would not be viable.

Chapter 9 Supporting the Economy and Town Centres

- Policy SE08 Local shops and services is not a strong policy and does not make sense. It was suggested that the current Local Plan policy E14 was a stronger policy and a positive statement as it protected our villages shops which should be protected.
- Clarification was sought on Policy SE02 Employment development in the countryside and whether this applies to new employment sites. Committee were advised this would not be encouraged as they would be unsustainable.
- Clarification was sought about whether Policy SE02 would want to encourage intensive farming. Committee were advised the policy was aimed at other small businesses in the countryside and not agricultural businesses.
- Clarification was sought about the expansion of an existing rural business and when does it become too big?

Chapter 10 High Quality Design
No comments

Chapter 11 Sustainable Transport and Communications
No comments

Chapter 12 Our Outstanding Landscape

- Policy OL11 Development on High Quality Agricultural Land – this policy is weaker than the current policy and needs to be better.

Councillor Ben Ingham proposed, and Councillor Geoff Jung seconded to extend the Green Wedge for Exmouth to Lympstone Green Wedge down south of Summer Lane towards the Exmouth Estuary which will enable the National Trust land to be in a Green Wedge and up Hulham Road towards the Pebblebed Heaths. Councillor Geoff Jung also proposed to include the playing fields at Courtlands.

A vote took place and the proposal was not approved by the Committee.

Chapter 13 Our Outstanding Biodiversity and Geodiversity
No comments.

Chapter 14 Open Space and Sports and Recreation
No comments

Chapter 15 Our Outstanding Historic Environment
No comments

Chapter 16 Community Facilities
No comments.

RESOLVED:

1. That the publication draft of the Local Plan as appended to this report with the addition of the proposed text to cover stewardship arrangements as part of the Strategic Policy WS01 and the proposed additional policy on phased development be approved with delegated authority for the Assistant Director – Planning Strategy and Development Management in consultation with the Chair of Strategic Planning, to make adjustments to tidy up and refine local plan text wording to ensure consistency of approach through the plan, edit down overlong text and correct typographical errors.
2. That delegated authority be given to the Assistant Director – Planning Strategy and Development Management in consultation with the Chair of Strategic Planning to produce and finalise the Policies Map in accordance with Members resolutions on allocations and designated area boundaries, that will also form part of the consultation, noting policy boundary matters and changes referenced in this report.
3. To consult on the Regulation 19 version of the Local Plan as appended (subjected to amendments agreed under Resolution 1 above) with delegated authority to the Assistant Director – Planning Strategy and Development Management in consultation with the Chair of Strategic Planning to agree when consultation starts having regard to the requirements of the newly published NPPF.

Attendance List

Councillors present:

B Bailey
J Bailey
K Blakey
C Brown
B Collins
P Fernley
M Howe (Vice-Chair)
B Ingham
G Jung
D Ledger
Y Levine
T Olive (Chair)

Councillors also present (for some or all the meeting)

C Burhop
R Collins
P Faithfull
E Rylance

Officers in attendance:

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

Councillor apologies:

O Davey
P Hayward

H Parr

Chairman ..... Date: .....

Report to: Strategic Planning Committee

Date of Meeting 4th February 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

Changes arising from the new National Planning Policy Framework (NPPF)

Report summary

On the 12th December 2024 the government published the new National Planning Policy Framework (NPPF), following a consultation on changes that Members considered at their meetings on the 6th August and 11th September 2024. The key changes from a strategic planning perspective are:

- The housing need figure for East Devon under the new government standard method has increased to 1,188 homes per year. This is slightly higher than they previously consulted on earlier in the year.
- We have recalculated our 5-year housing land supply position based on the new requirement figure and the need for a 5% buffer and concluded that we have a 2.97 year housing land supply.
- The 4-year housing land requirement introduced by the previous government at the end of last year has gone and a 5-year housing land supply requirement is now in effect.
- The timescales for the proposed transitional arrangements that were set out within the consultation have changed and we now in effect have until the 12th March 2025 to publish our regulation 19 version of the plan for consultation.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

That Strategic Planning Committee:

1. Note the changes made in the new NPPF and the implications for the Council and production of the new Local Plan;
2. Note the updated 5-year housing land supply position and agree that the revised summary tables be published on the Council's website and used to inform decision making on planning applications.

Reason for recommendation:

To ensure that Members are aware of the changes arising from publication of the new NPPF and understand the current housing land supply position.

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

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 National Planning Policy Framework (publishing.service.gov.uk), Government response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation - GOV.UK (www.gov.uk).

Link to Council Plan

Priorities (check which apply)

☒ A supported and engaged community
☒ Carbon neutrality and ecological recovery
☒ Resilient economy that supports local business
☒ Financially secure and improving quality of services

Background

The government published the new National Planning Policy Framework (publishing.service.gov.uk) on the 12th December 2024 as well as a response to the consultation that they had undertaken in the preceding summer available at: Government response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation - GOV.UK (www.gov.uk).

This report seeks to summarise the key changes for strategic planning and their implications.

Housing Numbers and Transitional Arrangements

The NPPF consultation from earlier this year proposed transitional arrangements for plan making that would have given us 1 month from the publication of the NPPF to publish a regulation 19 version of the plan that met a housing need that was no more than 200 homes less than the figure derived from the newly proposed standard method figure (1,146 homes per year). This meant that

we could proceed under the transitional arrangements since we were already planning for 946 homes per year (i.e. 1,146 – 200).

The new NPPF as published gives us a slightly higher housing need figure of (1,188 homes per year). They have also changed the threshold for compliance with the transitional arrangements to 80% of the standard method figure which is 950 homes per year. On the face of it this means we would fall outside of the transitional arrangements by 4 homes per year or 96 homes across the plan period. However, since we built in a 10% buffer we believe that we can simply make up the shortfall from the buffer and present the plan as having met the 950 homes per year requirement figure but with a slightly reduced buffer.

In order to take advantage of these transitional arrangements we need to publish the Reg 19 version of the plan for consultation on or before the 12 March 2025 and submit for examination within 18 months of the 12th December 2024. This has given us more time than envisaged when the draft Regulation 19 version of the plan was agreed by Members at their meeting of the 11th December and as a result we have not progressed to consultation under that resolution. The changes mean that there is time to bring a final version of the plan for consultation to the committee and this is presented elsewhere on this agenda.

5 Year Housing Land Supply

As stated in the consultation the government have removed the requirement for only a 4-year housing land supply to be demonstrated in certain circumstances as introduced by the previous government in the December 2023 version of the NPPF. As a result, the requirement for a 5-year housing land supply is restored for East Devon for decision making purposes and also at the point of adoption of the Local Plan.

We also need to be mindful that as well as needing to demonstrate a 5-year housing land supply at the point of adoption for the local plan to be found sound the new NPPF also requires that from 1st July 2026 we will need to demonstrate a 6-year housing land supply for decision making purposes because our adopted plan is out of date. This requirement will also apply once the new Local Plan is adopted as it will have progressed under the transitional arrangements.

The changes also have more immediate consequences for our 5-year housing land supply position as this needs to be recalculated with the new standard method figure of 1,188 homes per year used as the requirement figure and a 5% buffer included as well. This means that the summary tables included in the annual Housing Monitoring Report presented to Members on the 29th November 2024 need to be updated and agreed by Members for publication. These tables which are presented on the following page show that the Council now has a 2.97 years housing land supply against a requirement of 5 years. This is clearly a significant shortfall that means that the so called ‘tilted balance’ has to be applied such that significant weight has to be given to the housing land supply position when considering housing developments.

Table A – Five year requirement calculations

	Revised East Devon housing requirement for 01 April 2024 to 31 March 2029		
	Calculation	**Description**	**Number of dwellings**
A		Basic annual requirement using the revised district Local Housing Need figure (LHN) as of 1/4/2024	1,188
B	A x 5	Five-year requirement target (i.e. 5 years x LHN)	5,940
C	B x 1.05	Five-year target with buffer added (i.e. 5 year LHN + 5% buffer)	6,237
D	C ÷ 5	Annualised five-year target with buffer	1,247.40

Table B – Five year supply calculations

	Supply sources as of 31 March 2024 with realistic prospects of delivering dwellings 01 April 2024 to 31 March 2029		
	Calculation	**Supply source**	**Number of dwellings**
E		Extant permissions	2,720
F		Cranbrook Plan DPD expansion zones *	600
G		Future windfalls	386
H	E+F+G	Total five year deliverable supply	3,706
I	C-H	Five year supply (surplus / shortfall)	2,531 **SHORTFALL**
	Revised five year housing land supply position as of 2024 Monitoring Point		
J	H ÷ D	Years of land supply	**2.97 years**

* Consents issued since the end of the monitoring period but previously included due to resolutions to grant

These tables have already been verbally presented to Planning Committee as an update to the annual monitoring report which was presented to them on the 17th December.

Local Character and Design Coding

The government have made some changes to the policies on local character and design including deleting reference to local character being taken into account when Councils consider their ability to meet their housing needs.

All references to 'beauty' and 'beautiful' in relation to well-designed development have been removed . It was acknowledged in the consultation that this term is too subjective.

Affordable Housing

The government has removed the requirement for at least 10% of the total number of homes on major sites to be delivered as affordable home ownership products and that 25% be delivered as First Homes. Although the option to deliver First Homes remains this is not a popular product in the construction industry. These changes also give greater local flexibility and should enable the delivery of types of affordable housing that better meet locally identified needs including social rent housing.

Planning Application Fees

The fee for most householder developments is to be increased from £258 to £528 with exceptions including small scale operations such as gates and fences etc. The government intends to bring forward regulations to make this change at the earliest opportunity and it is likely to materially increase fee income to the authority which will enable a greater level of cost recovery for this area of the service.

The government have also announced an intention to bring forward measures in the Planning and Infrastructure Bill to enable local fee setting for planning applications on a cost recovery basis for those that wish to pursue this. There would also be a base line new set of national fees based on a new assessment of costs which would be the default where local fee setting has not been implemented. More guidance will follow but the intention is the local fees are fully consulted upon and that they would only be able to recover the costs of the development management part of the service and not the costs of wider service delivery such as plan making.

Financial implications:

There are no direct financial implications identified in the report.

Legal implications:

The legal implications are set out within the report (002533/4 February 2025/DH).

Report to: Strategic Planning Committee

Date of Meeting: 4 February 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

East Devon Local Plan – approval for Regulation 19 consultation 2025

Report summary:

This report seeks approval for consultation on (a slightly amended from previous drafts) Regulation 19 local plan. On the 12 December 2024 a new National Planning Policy Framework was published, it allows for a period of three months from the date of its publication for local plans to start the Regulation 19 stage of public consultation. A resolution at Strategic Planning Committee on 11 December 2024 provided delegated authority for minor changes to be made to the plan before consultation started. However, given that we now have the flexibility to come back to committee with a final proposed consultation plan it was seen as prudent to do so to ensure that committee can see, and we trust endorse, the final plan for consultation. Subject to committee approval (with no additional committee changes being of a substantial scale) consultation will commence in the week starting 10 February 2025 and run for six weeks.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

1 That Strategic Planning Committee approve the Publication draft of the plan as appended to this report with delegated authority for the Assistant Director Planning Strategy and Development Management, in consultation with the Chair, to make final minor adjustments to tidy up and refine local plan text wording to ensure consistency of approach through the plan, align formatting and correct typographical errors.

2 That Strategic Planning Committee agree to consult on the Regulation 19 version of the Local Plan as appended (subject to amendments agreed under recommendation 1) to run for six weeks, to commence in the week starting 10 February 2025.

Reason for recommendation:

To ensure the Council can undertake consultation under Regulation 19 of the plan making regulations in a timely manner.

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: High Risk; There are significant risks, and more strictly speaking challenges, associated with producing a local plan, these relate (amongst other matters) to technical robustness and justification of content and uncertainties over timing. There are, however, greater risks associated with not having a plan, either through choice or through failure at Examination.

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. Introduction

1.1 This committee report should be seen and read as an addition to the report 'East Devon Local Plan – approval for Regulation 19 consultation' that was considered by Strategic Planning Committee on 11 December 2024 - 1. Reg 19 approval for consultation report Final.pdf (eastdevon.gov.uk). We do not seek to replicate issues in that report, rather we update and highlight matters going forward that will allow for consultation, under Regulation 19 of the plan making regulations, to commence in the week starting 10 February 2025 and to run for six weeks. That is subject to committee not wanting to make any significant changes to the plan that will take time to complete and/or require coming back to committee.

1.2 In the report of the 11 December 2024, we advised that we did not know when the new National Planning Policy Framework (NPPF) would be published. Specifically noting the unknowns around how much time, when published, it would allow for plans to progress to Regulation 19 stage of plan making, under transitional arrangements, noting that the Government have advised that a new plan making regime is coming into place. Given the uncertainty over timings, and the potential need to move swiftly to start the Regulation 19 consultation, resolution in December 2024 was sought and gained for delegated authority to be granted to allow for final plan changes to made prior to consultation starting. However, one day after committee, on the 12 December 2024, the NPPF was published. It provides for a three-month period for consultation to start from the date of its publication. We do, therefore, have leeway to bring a report back to committee with final plan changes. We need to submit the plan for Examination before the end of 2025.

1.3 Officers have been reviewing and refining the plan since the last committee meeting and the full local plan text is attached as Appendix 1 (this a clean version). Appendix 2 to this committee report is a tracked changes version so that Members can note the specific changes with notes explain why they have been made.

1.4 The local plan text is accompanied by the Policies Map which is on an online interactive map that can be viewed (in current draft) at: https://maps.strata.solutions/portal/apps/webappviewer/index.html?appid=8da794a146d94df680ee37c7589e9a1e

1.5 It should be noted that the policies map is subject to refinement and tidying up, but not boundary changes (unless committee resolve to make changes) ahead of consultation starting. PDF versions of maps of the towns and villages within the settlement hierarchy will also be available here: https://eastdevon.gov.uk/local-plan

2 Changes made to the 11 December 2024 draft of the plan

2.1 The plan text at Appendix 1 forms a redraft of that endorsed (noting resolutions and agreed changes) at Strategic Planning Committee on 11 December 2024 and some mostly minor additional changes that seek to provide further clarification and address anomalies.

2.2 In the tracked change background version, where very minor changes are made (that is in most cases) those changes are not highlighted with supporting/justifying comment (and some very minor ones are not shown as tracked changes). For example, in the draft plan there were references to 'new community', 'new town' and 'new settlement'. We have standardised text to now refer to 'new community' only (unless alternative wording is specifically used in a qualified manner by explicit design).

2.3 Changes in the background version of the plan text that are seen as slightly more than minor have accompanying commentary to explain why the change is made.

2.4 Changes made to the plan, from the 11 December 2024 version' take account of:

a) general tidying up and removal of spurious detail and a more general attempts to make wording as succinct as reasonably possible.

b) Seeking to make policy and the plan precise in terms of application and meaning.

c) ensuring that changes agreed by committee on 11 December are incorporated.

d) updating to reflect the 12 December 2024 NPPF, though noting that the plan text is written to align with, and will be examined under, the December 2023 NPPF, but we do need to be aware of the new version and what it is seeking to achieve.

e) Other minor matters that have been noted and general points of clarity that are deemed helpful to include, specifically including about the proposed 2nd round of Regulation 19 consultation for Spring 2025.

f) There are also some minor matters, for example in respect of consultation start date, that are in highlighted text that will need to be resolved in final editing.

2.5 We will need to undertake re-formatting and make inconsequential final amendments to the draft plan to ensure that there will be an attractive finished plan to consult on.

3 An attractive and an accessible version of the plan and a plain accessible version

3.1 The plan, attached as Appendix 1, has been designed to be visually attractive, appealing and accessible. It will go on to the Council web site and will be the draft of the plan that we will primarily publicise and expect most people to use. However, to achieve very highest reasonable possible levels of accessibility we will also seek to produce a plain text version that is stripped back to black and white, limited formatting, text only.

4 Housing provision in the local plan

4.1 We would highlight that there was a change made in the new, December 2024 NPPF, that amended the housing numbers that plans need to provide for under transitional arrangements. Prior to publication of the new NPPF we were working to Government guidance that resulted in needing to plan for at least 946 new homes per year. The NPPF change, paragraph 236 - National Planning Policy Framework (publishing.service.gov.uk) establishes an approach that results in needing to plan for at least 950.4 homes per year. The annual change is very small but it does add up to an extra figure of 97 over the 22-year life of the plan.

4.2 Committee will be aware that in previous assessment work we had built an additional buffer into our housing number calculations, we were aiming for a 10% headroom allowance. The additional houses we need to plan for will ‘eat’ a small way into the

buffer provision. Taking the plan as a whole, for 2020 to 2042 (i.e. over 22 years) the sources of housing supply are:

- houses built to date;
- planning permissions not yet implemented;
- projected future windfall developments; and
- local plan allocations).

4.3 There is a projected delivery, if all of the above are built, of 22,614 new homes. This is set against a need of 20,908.8 homes (22 years multiplied by 950.4 per year). There is, therefore, a 'surplus', an amount by which we exceed need, of 1,705.2 new homes. This surplus, expressed as a percentage equals 8.16% and is an overarching headroom figure, it gives flexibility around the fact that some of the sources of supply may not in practice be built.

4.4 Though a refinement that can be applied to the above is based on the fact that 3,514 of the houses have already been built and as such there is not a concern that they will not be built. We can, therefore, deduct 3,514 from the gross supply of 22,614 to give a net supply, for the years 2024 to 2042, of 19,100. Across the 18 years running from 2024 to 2042, there is a need to accommodate a net figure of 17,398.4 new homes (this is based on a gross 22 year need of 20,908 minus the 3,514 that have already been built). Deducting this projected supply from a need for 17,398.4 gives a 'surplus' of 1,705,2 This surplus figure, expressed as a percentage of the need for 17,394.4, gives a refined headroom of 9.80%.

4.5 We need to be aware that figures are based on housing monitoring records to the year end of 31 March 2024. We will need to recalculate these figures to reflect data for future monitoring years and also Government Standard Method housing numbers are revised over time so in future years the need to accommodate numbers may change.

4.6 Given complexities of bringing sites forward for development in East Devon we have also previously highlighted the need for a stepped delivery trajectory of housing in East Devon. The work we have undertaken adopts more conservative and realistic delivery assumptions across existing settlements, resulting in a more measured trajectory compared to that previously presented to members in the first version of the publication plan in late 2024. Key refinements include adjusting the timing of more complex development sites (those over 300 units, sites within National Landscapes, and brownfield sites) to commence beyond the first five years following plan adoption. Additionally, we have taken a more cautious approach to early-year delivery rates, acknowledging the uncertainties around when allocated sites may come forward. This conservative approach provides some resilience against potential delays in site delivery during the crucial early plan period.

4.7 In recognition of the complexities inherent in delivering major development sites, particularly the proposed new community, we are proposing a stepped housing target approach for the plan period. This would set an annual target of 850 dwellings from 2020/21 to 2031/32 (incorporating the first five years post-adoption, estimated for

2027), stepping up to 1,070 dwellings per year from 2032/33 until the end of the plan period. This stepped approach should enable the Council to demonstrate a robust 6.59% five-year housing land supply upon adoption, which is a critical requirement for plan soundness.

4.8 The new NPPF paragraph 78(c) also requires a 20% buffer for decision-making purposes post-adoption. Our trajectory planning has therefore incorporated sufficient headroom to maintain a five-year housing land supply even with this additional requirement.

4.9 Achievement of these trajectories relies on the continued and timely issuing of consents for new residential development so that sites that are projected for delivery can actually be delivered in the anticipated timescales. As a result, while a compliant position is achievable based on our current expectations it is important that the Council continue to give significant weight to the current housing land supply deficit in decision making.

5 The second, new community specific, Regulation 19 consultation in spring 2025

5.1 The draft local plan (Appendix 1) is written with the clear expectation that a second round of Regulation 19 consultation will take place in Spring 2025. This second round of consultation is explicitly concerned with the second proposed new community and detailed matters relating to it. However, there are interactions between the second new community and spatially surrounding areas and there are also wider district wide policy matters that have an inter-relationship.

5.2 It is very much a draft timetable at this stage but we would envisage that following the first round of consultation:

- A report will come to committee in early May 2025 with recommendation for a second round of Regulation 19 consultation.
- The consultation will start in early/mid-May 2025.
- Consultation will conclude in late June 2025.
- The local plan, the product of the 1st and 2nd round of consultation, will be submitted for Examination in Autumn 2025 (likely to be October 2025).

5.3 Based on the above and plan Examination lasting one year (or slightly over one year) plan adoption would be envisaged in late 2026/early 2027.

5.4 Whilst we do in the draft plan (Appendix 1) include policy for the new community (and land allocation on the Policies Map) the 2nd round of plan consultation needs to be specifically seen within the context of the following:

- There is ongoing evidence work that needs to inform policy for the new community and therefore the 2nd round of plan consultation – specifically around transport assessment, new community viability and new community master planning.

- The council has submitted a bid under the Government new town programme - any feedback from that bid (ideally a 'green-light' endorsement), will help inform policy refinement.
- There is further wider assessment that is needed to inform the plan and submission for examination that will arise from and be related to the new community consultation, though potentially with wider local plan relationships and impacts.

5.5 Having the second round of consultation provides some but limited scope to also consider possible changes and refinement of the plan for matters outside of and beyond the 2nd new community where we receive feedback from the first round of consultation. These maybe in respect of new matters or considerations that arise and that warrant possible plan changes. Having a gap (though noting it is short – around one month) between the first consultation finishing and approval being gained at committee for the second round to start provides scope to look at potential wider plan changes and consulting on these as well before plan submission.

6 Local plan evidence

6.1 Committee will be aware that a substantial body of evidence has been produced to support the local plan and much is referenced in the plan itself (we are finalising some documents as well that will support the plan when consultation starts). But we would wish to draw to committee attention some key evidence documents, as listed below.

a) **Infrastructure Delivery Plan** – this plan is specifically concerned with infrastructure that is identified as needed by or required to deliver local plan policy. At this stage it does not apply to the second new community which will have its own plan to be published at a future date.

b) **Greater Exeter Transport Study** – this study, which is ongoing with final outputs to inform the new community consultation later in the year, will assess options and potential for promoting non-car based/car reduced travel patterns and use thereby placing greater emphasis on such matters as public transport use and walking and cycling rather than building more roads, with more concrete to accommodate more vehicles.

c) **Habitat Regulations Assessment** – plans need to be supported by assessment under the Habitat Regulations. We should have an initial assessment available and published at the time plan consultation starts. There will be further ongoing work, in particular in respect of the second new community, and we will also need to commission a mitigation strategy arising from concerns around vehicle emissions adversely impacting on the Pebblebed Heaths and increases in vehicle flows that will occur on account of new development.

d) **Viability Assessment** – initial outputs from this commission have informed plan policy and a final report should be available at/before plan consultation starts. The new community will be subject to separate assessment work.

e) **Flooding studies** – consultants have produced Strategic Flood Risk Assessment work for the council that will be published.

f) **Equalities Impact Assessment** – An assessment of the plan has been completed. This shows how equality considerations have been taken into account and addressed in the plan.

g) **Site Selection reports** – site allocations for development, and committee consideration of these, has been informed by site selection reports. These will be published, though updated to note committee consideration/decisions.

h) **Sustainability Appraisal** – this work sets out assessment of the plan overall and policies within (and alternative options), in respect of potential sustainability impacts.

i) **Water Cycle Study** – this work is ongoing and whilst having local plan relevance it is also of wider corporate relevance to the Council and our communities.

j) **Sites within National Landscapes** – the National Planning Policy Framework includes specific refence around development of sites in National Landscapes and this assessment work references assessment work we are undertaking.

6.2 We are building up a full evidence library, that will be expanded on over time, to support the local plan and to which local plan referenced evidence will refer. When available this will include the documents listed above and many others - Evidence Base and Supporting Documents - East Devon

7 The format for consultation

7.1 The Regulation 19 consultation will be hosted using Commonplace, the council's citizen engagement platform, which all respondents are encouraged to use when submitting comments. It is important to note that the Regulation 19 consultation is to ascertain whether or not the draft Local Plan has met all the necessary legal requirements, rather than having the more general 'have your say' approach the Regulation 18 consultation had. It is a formal, technical consultation, and this will be reflected in the standardised response form. However, all comments will be reviewed, summarised and presented in a consultation feedback report and made available for the planning inspector appointed to undertake the Examination.

7.2 The consultation should be presented as this is the local plan that the council has produced and intends to submit for examination following the extensive engagement process that we have been through and the many changes to the plan that have happened as a result. Now it is for those that formally wish to object to make their views known rather than for there to be further discussion and amendments. To reflect this it is not proposed to hold public meetings or exhibitions, in respect of this consultation.

8 Implications for neighbourhood planning

8.1 The implications for neighbourhood plans, whether 'made', emerging, or future, vary across the district, depending on the nature and application of the policies and proposals in the new Local Plan in each area.

8.2 The transition period from one adopted Local Plan to another is a particularly challenging time for neighbourhood plan making, related to the uncertainty of the final content of the emerging Plan and the legal requirement for neighbourhood plans to continue to demonstrate general conformity with the adopted Local Plan.

8.3 The timely publication of the Regulation 19 Local Plan will mark a significant milestone by giving communities a somewhat firmer basis for considering the relationship, and appraising the need for / focus of a new or updated neighbourhood plan going forward.

8.4 It should be stressed that all made neighbourhood plans remain part of the statutory development plan, until such time and extent to which they are superseded by the new Local Plan. Decisions on planning applications will therefore continue to be made with reference to and in accordance with them, in line with the full weight that can be afforded to them in all the circumstances by national planning policy and guidance.

8.5 The adoption of the new Local Plan is a logical trigger for a review of a neighbourhood plan although this is not a mandatory requirement, and likewise, a neighbourhood plan can be progressed at any time in response to particular local needs/circumstances.

8.6 Dedicated Officer support is available to communities in considering, preparing and reviewing neighbourhood plans and understanding the relationship with the local plan.

8.7 As part of this role, Officers propose holding the next in a series of webinars to support town and parish councils (whether engaged in neighbourhood plans or not) to hear more about the Regulation 19 stage and the onward stages and ask questions of Officers to help with considering implications for their communities, any formal response they may wish to make, and whether and when work on a new or updated NP may be appropriate. As previously, the session would be open to all EDDC Members.

8.8 Dedicated Officer support is available to communities in considering, preparing and reviewing neighbourhood plans and understanding the relationship with the local plan.

Financial implications:

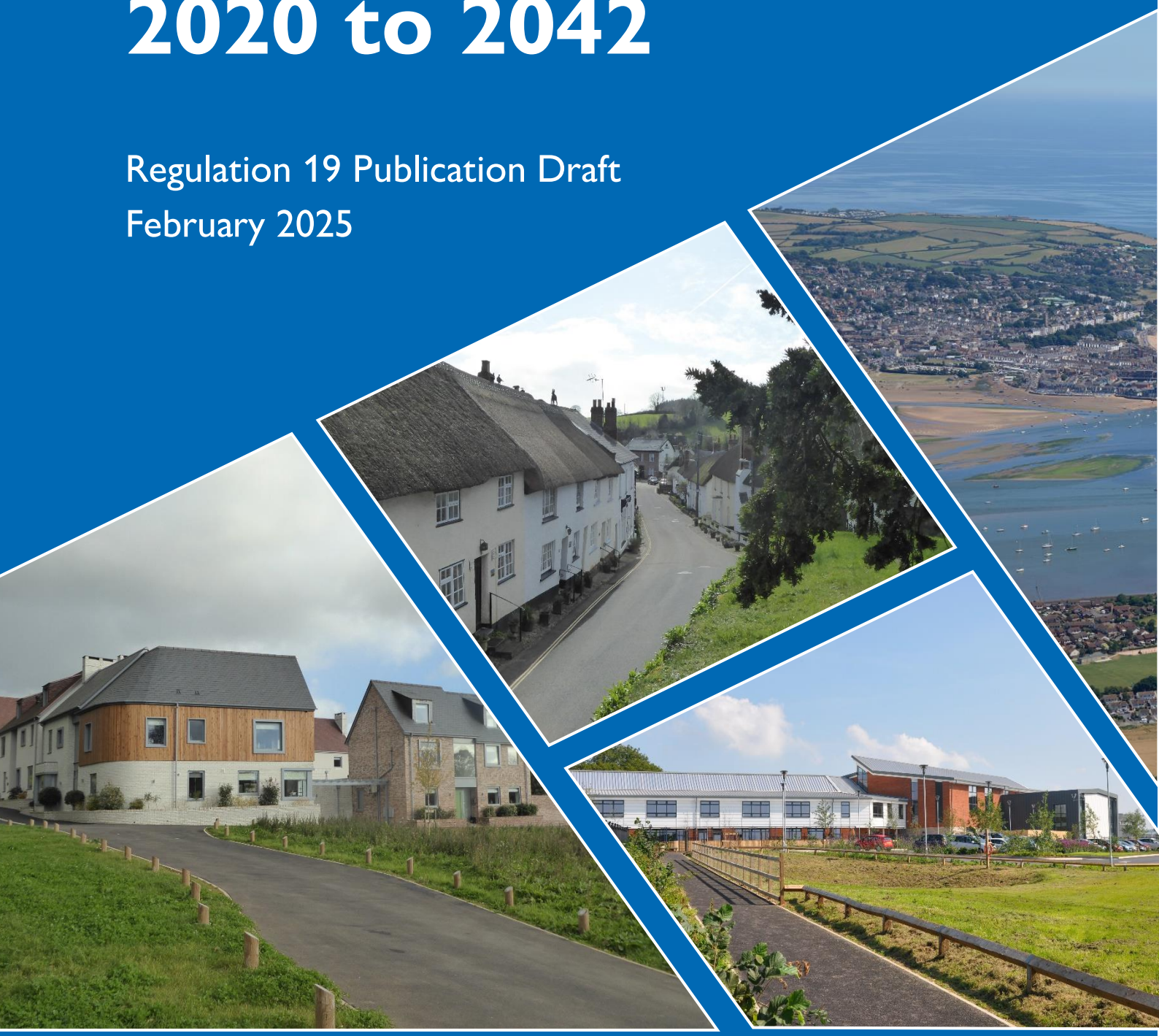
There are no direct financial implications identified in this report.

Legal implications:

The legal implications are set out within the report (002533/4 February 2025/DH).

East Devon Local Plan 2020 to 2042

Regulation 19 Publication Draft
February 2025



East Devon District Council

Draft document

Foreword

East Devon is an outstanding place.

From the rugged beauty of our Jurassic Coast to the peace and tranquillity of our National Landscapes, we are surrounded by a glorious, thriving natural environment; between the quiet vitality of our towns and the gentle warmth of our historic villages, we share in a proud and welcoming community - and whether in the fierce determination of our farmers, rural workers, and small business owners, the passion and resilience of our tourist industry, or the drive, creativity, and innovation of our high- and green-tech industries in the West End and Enterprise Zone, we benefit from a diverse, resilient, and growing rural economy.

This Local Plan, guiding development in East Devon through to 2042, aims to preserve and enhance these distinctive qualities. While government policy necessitates the allocation of land for housing and employment, our focus remains firmly on ensuring development is balanced, sustainable, and beneficial to our communities. This Plan is underpinned by principles that seek to protect our outstanding landscapes and wildlife while fostering vibrant, inclusive communities.

Key to this vision is our commitment to delivering genuinely affordable housing and implementing strong measures to reduce carbon emissions both during construction and throughout the operational lifespan of new developments. We also aim to exceed government requirements for biodiversity enhancement and set out a comprehensive strategy to support thriving town centres, robust community facilities, and opportunities for local businesses to flourish. By creating spaces that enable residents to live and work close to home, we aspire to make East Devon even more attractive to the industries of the future. We hope this vision delivers as far as we can on what our community has told us is important, and we're grateful to everyone that has participated in the process of developing them – whether through our online consultations, town hall meetings, or by coming in-person to join in discussions.

The creation of a new community between the A30 and A3052—a significant part of this Plan—exemplifies this approach. By consolidating a substantial portion of East Devon's housing needs in this new community, we can deliver the infrastructure and affordable housing that our area urgently requires. This development represents an opportunity to apply the lessons learned from Cranbrook, ensuring the new community is thoughtfully designed, sustainably developed, and well-integrated into the natural environment, with essential services and facilities in place from the outset.

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We recognise there will be challenges in delivering the vision set out by this Local Plan, and that the evolving nature of government policy and the national planning framework may sometimes limit what can be achieved. However, this Plan reflects our steadfast commitment to work within these constraints to deliver the best outcomes for East Devon.

Above all, this Local Plan represents more than a framework for development; it is a pledge to the people of East Devon. It is a commitment to safeguard the exceptional qualities of our district while moving towards a sustainable, inclusive, and prosperous future for all who live, work, and visit here: to make East Devon an even more outstanding place.

Councillor Todd Olive
Portfolio Holder for Strategic Planning



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About this consultation

The local plan has reached the Regulation 19 stage of production and consultation, this is a formal legally prescribed stage of plan making. Consultation starts on insert date February 2025. This will be the first planned phase of Regulation 19 consultation. A second phases of Regulation 19 consultation is planned to run from Spring 2025 through to the early summer (dates to be confirmed). Thereafter the plan will be submitted for examination in Autumn 2025. The submission process involves sending the plan and supporting documents, including comments and representations received, to the Planning Inspectorate who will undertake a plan examination.

The plan in current draft form covers all local plan matters with the exception of full policy details on the new community proposals. Evidence work, as at early 2025, is ongoing in respect of the new community (see specifically Strategic Policy WS01 in this plan) as well as on other inter-related local plan matters. Once this evidence work is completed, and policy gaps in the plan can be filled in, and further policy refinement undertaken, the second phase of consultation will take place.

This second phase of consultation is envisaged to introduce limited new material into the plan, though does provide scope for refinement of new community policy and some minor more general amendments.

A new National Planning Policy Framework (the Government's overarching policy on planning matters) was issued in December 2024. This set out transitional arrangements for local plans to progress under the current plan making regime ahead of legislative changes, a new plan making system, announced for 2025. The new (December 2024) National Planning Policy Framework also allows for local plans to progress and be examined under the National Planning Policy Framework dated December 2023, subject to meeting defined deadlines. This plan, and policies within it, are drafted to accord with the December 2023 National Planning Policy Framework and all references in the plan are to this document, unless specifically stated otherwise. In drafting the plan we have, however, been mindful of the new national guidance and the direction of travel of Government policy.

Comments on all concerns identified should be made at this stage of consultation, this includes in respect of policy WS01, notwithstanding that any such comments, specifically on new community matters, can be elaborated on at the second stage of consultation when more policy detail and supporting evidence will be available

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Comments must be received by East Devon District Council by insert time and date.
For more details on making comments see the Council web site .... insert web address.

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Introduction



Chapter 1. Introduction

The role of the local plan

1.1. The primary role of the local plan is to guide and inform decisions on where and how development will take place in East Devon. It forms part of the Development Plan, which is the key basis for determining planning applications.

1.2. The Local Plan, and the Development Plan overall, must be read as a whole to understand complete policy coverage. We have avoided replicating matters in different plan policies where a single policy reference addresses the relevant consideration.

1.3. The East Devon Local Plan covers the period from 1 April 2020 to 31 March 2042. Upon adoption, it will supersede, in their entirety, the East Devon Local Plan adopted in 2016 and the Villages Plan adopted in 2018.

1.4. On adoption this local plan, the Cranbrook Plan, made Neighbourhood Plans and waste and mineral plans produced by Devon County Council will make up the Development Plan for East Devon. This local plan provides planning policy coverage for selected matters within the Cranbrook Plan area. The adopted Cranbrook Plan remains part of the Development Plan[1] and is the primary plan for determining planning applications at Cranbrook. However many policies in this new local plan will also apply within the Cranbrook Plan area and should be applied alongside Cranbrook Plan policies which will remain in place as part of the Development Plan. , . Where policies in this plan apply to parts of or the whole of the Cranbrook Plan area this is specified in policy, and with the exception of allocation policies that fall outside of the West End as are cases where any policy does not apply.

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[1] OTE-001 - Cranbrook Plan DPD 2013-2031, https://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/adopted-cranbrook-plan-dpd-2013-2031/#article-content

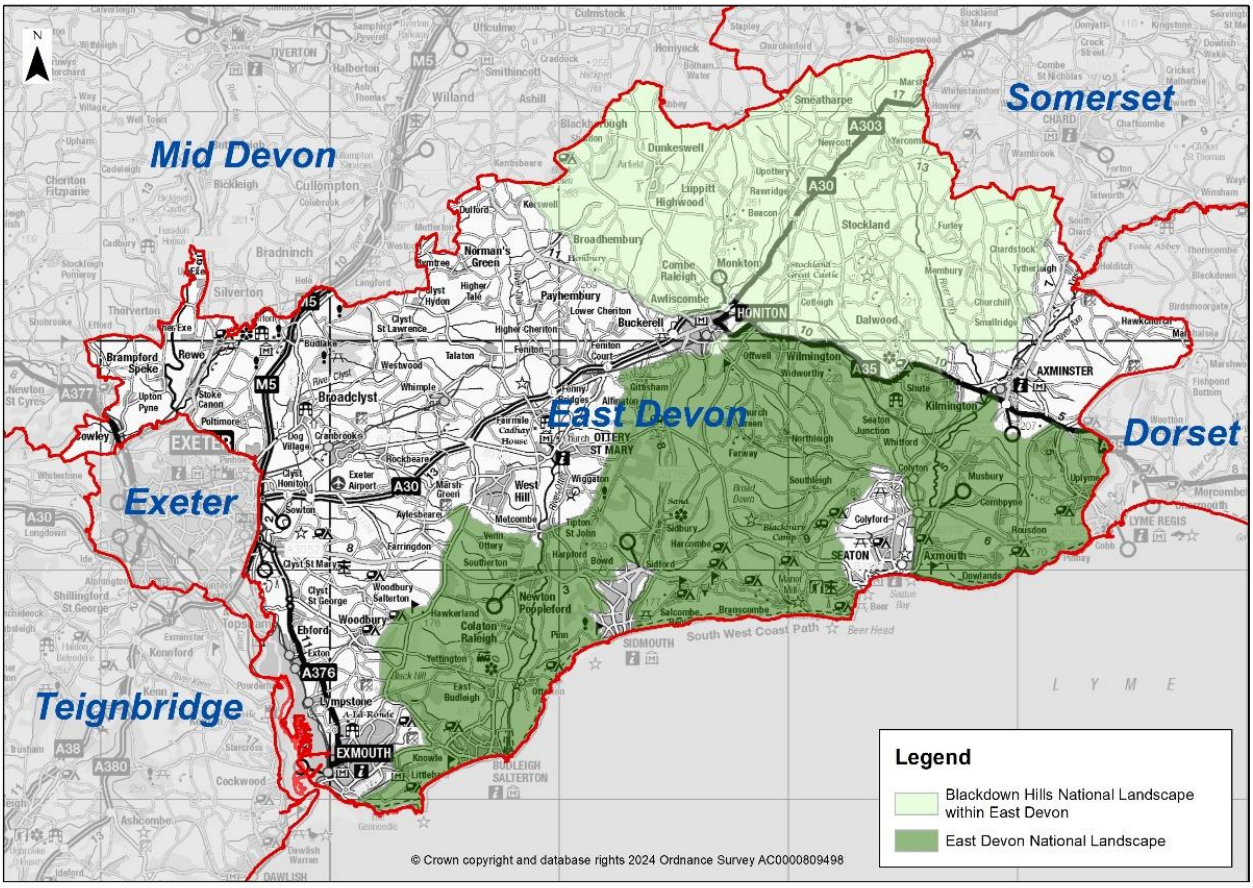


FIGURE 1 East Devon District and neighbouring authorities

Strategic and non-strategic policies and the Policies Map

1.5. The plan differentiates between strategic and non-strategic policies, as advised to do so by the National Planning Policy Framework.

1.6. Strategic Policies set out the overarching approach and deal with major subject matters fundamental to decision-making or setting a general tone.

1.7. Non-strategic policies typically add an extra layer of detail to inform decision-making.

1.8. Strategic policies are denoted with the word 'Strategic' in the title, while all other policies are non-strategic. Neighbourhood Plans and their policies can supersede non-strategic policies but not strategic policies.

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1.9. Many policies refer to specific locations or areas defined on the Local Plan Policies Map.[2]

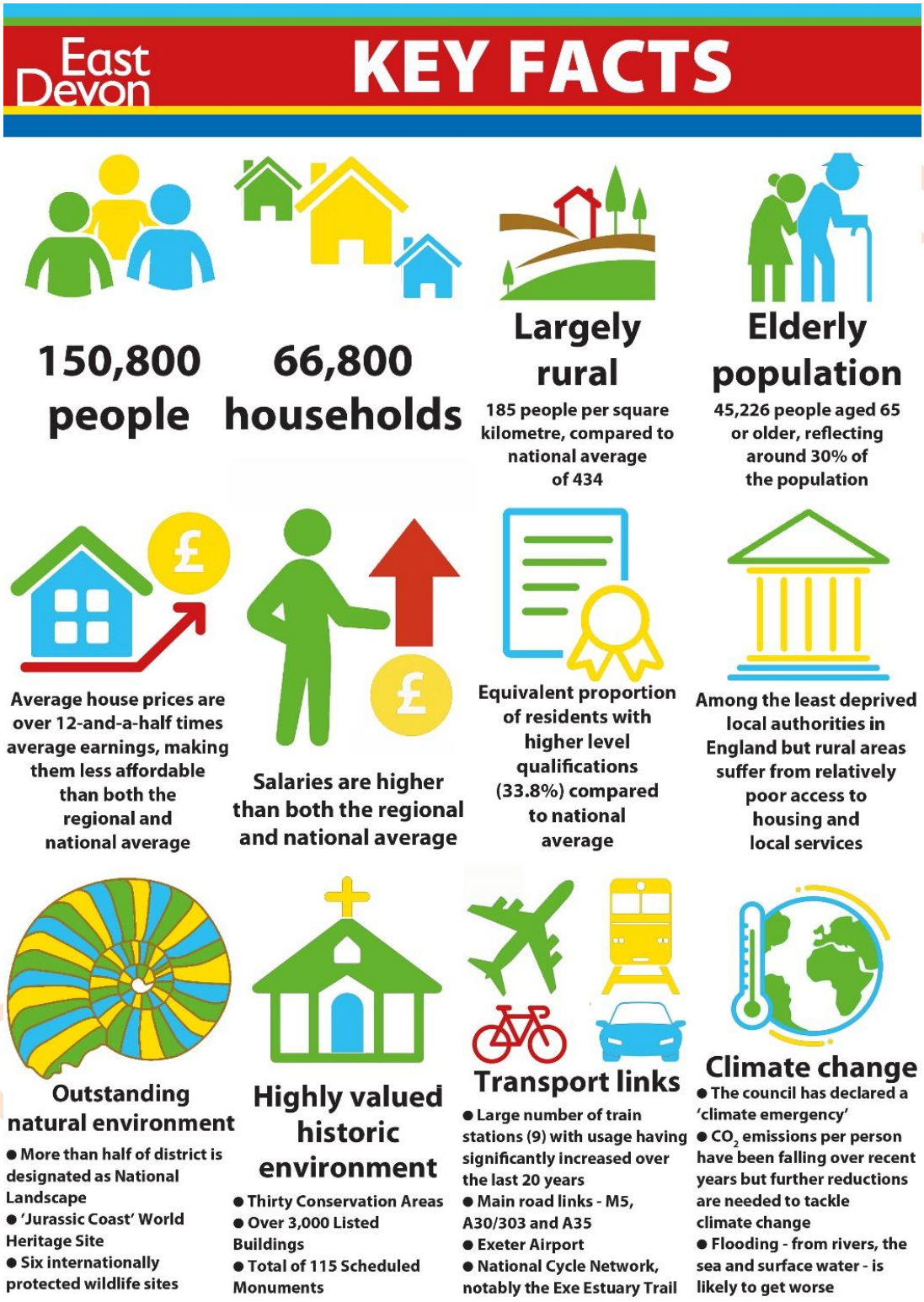


FIGURE 2 Key Facts

The role of and relationships with neighbouring planning

1.10. Neighbourhood planning is actively supported by the District Council, with 27 made plans at the time of plan Publication. Activity to prepare and review plans is expected to increase with the adoption of the new Local Plan.

1.11. After adoption, neighbourhood plans will be tested for conformity with local plan strategic policies and can add local specificity or supersede non-strategic policies if needed. Once made, they become part of the statutory Development Plan, and development decisions should align with them.

1.12. We encourage developers to consider the aims and policies of relevant neighbourhood plans and engage with local communities at an early stage when preparing planning applications. The new Local Plan will supersede conflicting neighbourhood plan policies but otherwise, existing plans and their policies will remain in effect until replaced.

1.13. Information about neighbourhood plans in East Devon is available on the Council's website.[3]

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[3] OTE-002 - Neighbourhood Plans in East Devon, https://eastdevon.gov.uk/planning/planning-policy/neighbourhood-and-community-plans/neighbourhood-plans/

The Vision



Chapter 2. The Vision

Our local plan vision

2.1. By 2042 and beyond East Devon will be a diverse, inclusive and thriving place to live and work and a pleasure to visit and enjoy.

2.2. In responding to the climate emergency we will continue to play our part in what will be an increasingly net zero carbon world. At a local level we will be operating at net zero carbon, minimising energy consumption and maximising renewable energy generation. Communities in East Devon will be adapting to a changing climate.

2.3. We will ensure our urban areas and towns and villages, as they grow to meet future needs, continue to be great places to live and have better access to the surrounding countryside for all. Looking beyond our boundaries we will need to maintain strong relationships with the adjacent city of Exeter and our other neighbours.

2.4. The western side of East Devon will remain a focal point for growth with Cranbrook now well established and thriving. Our second new community will be a council and corporate led development meeting the needs of a growing population. Alongside additional housing, new high-technology and green businesses will continue to invest in the western side of the district securing high quality jobs and training. This development will come forward in an outstanding environment with the expanded and expansive Clyst Valley Regional Park wrapping around new developments.

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

2.6. Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development to meet the needs of local communities. Farming and rural activities will still dominate the use of land. Where possible we will retain high quality land in agricultural production as we move towards more environmentally sustainable farming practices into the middle decades of the 21st century.

2.7. Across East Devon new development will draw on our outstanding heritage legacy but will also be innovative in design and forward looking to incorporate net zero carbon technologies in new buildings and built spaces. Working with partner bodies we will

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strive to secure better facilities, especially where there may be current deficits in provision, including for schools and medical services. This will include in locations where past housing development has occurred without adequate services.

2.8. New, expanded and improved physical, social and community facilities and infrastructure will be delivered alongside development. This will ensure that people live healthier and happier lives with greater access to services and facilities in a cleaner and greener setting. Sustainable transport links, active travel provision and infrastructure connecting communities will be enhanced and provided alongside development. High quality urban spaces, and our existing towns and built development, will link in with enhanced Green Infrastructure, open space and recreational facilities.

2.9. Our beautiful and diverse countryside, National Landscapes, world class Jurassic coast, nature reserves and built heritage assets will be protected and enhanced. We will ensure that alongside new development there is greater care of the natural world with biodiversity improvements and a far richer and more nature friendly tapestry of green spaces in the future. These will support both nature recovery and the health and well-being of our communities.

2.10. The plan objectives set a framework for the chapters and specifically the plan policies that follow. The objectives are not in a priority order or ranking and no one carries any more or less weight than any other.

TABLE I. Plan Objectives

Designing for health and well-being	Objective 1	To encourage healthy lifestyles and living environments for all East Devon residents.
Tackling the climate emergency	Objective 2	To ensure all new development moves the district towards delivering net-zero carbon emissions by 2040 and that we adapt to the impacts of climate change.
Meeting future housing needs	Objective 3	To provide high quality new homes to meet people's needs.
Supporting jobs and the economy	Objective 4	To support business investment and job creation opportunities within East Devon and support a resilient economy.
Promoting vibrant town centres	Objective 5	To promote the vitality of our town centres, encourage investment, greater flexibility and a wider range of activities to increase footfall and spend.

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Designing beautiful and healthy spaces and buildings	Objective 6	To promote high quality beautiful development that is designed and constructed to meet 21st century needs.
Our outstanding built heritage	Objective 7	To conserve and enhance our outstanding built heritage.
Our outstanding natural environment	Objective 8	To protect and enhance our outstanding natural environment and support an increase in biodiversity.
Promoting sustainable transport	Objective 9	To prioritise walking, cycling and public transport and make provision for charging electric vehicles
Connections and infrastructure	Objective 10	To secure infrastructure needs at an appropriate time to support new development
Supporting sustainable and thriving villages	Objective 11	To help support villages and protect and enhance facilities and services they offer.

2.11. The vision and objectives of the plan, as set out in policies to follow, are captured in the local plan key diagram below.

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East Devon Local Plan 2020-2042: Key Diagram

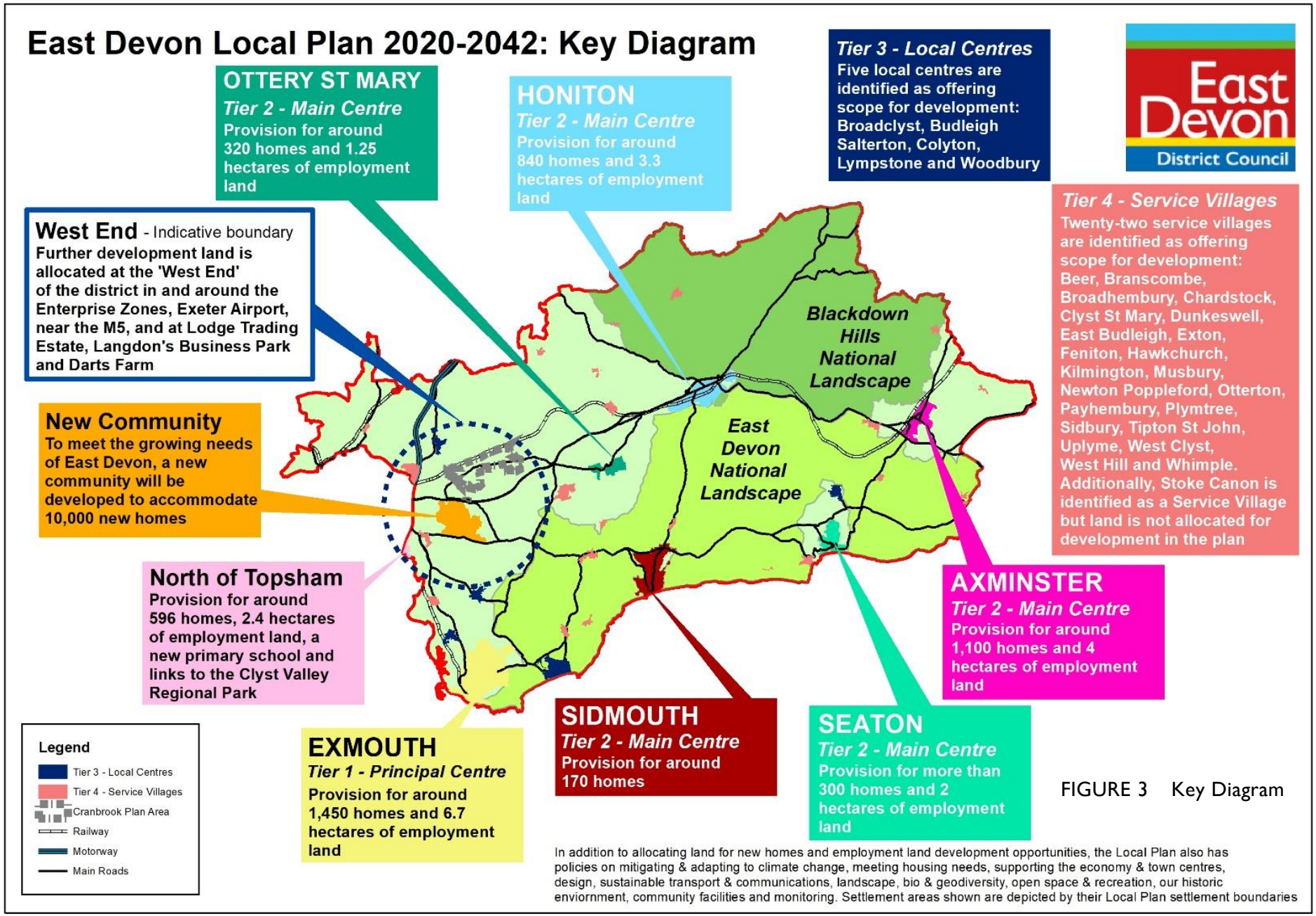


FIGURE 3 Key Diagram

In addition to allocating land for new homes and employment land development opportunities, the Local Plan also has policies on mitigating & adapting to climate change, meeting housing needs, supporting the economy & town centres, design, sustainable transport & communications, landscape, bio & geodiversity, open space & recreation, our historic enviornment, community facilities and monitoring. Settlement areas shown are depicted by their Local Plan settlement boundaries

The Spatial Strategy



Chapter 3. The Spatial Strategy

Introduction

3.1. The spatial strategy of the local plan is concerned with establishing an overarching picture of the amounts, types and distribution of future development that will be accommodated in East Devon. We set out an overarching strategic policy that addresses these matters.

Strategic Policy SP01: Spatial strategy

New development will be directed towards the most sustainable locations in East Devon, by:

A. Focusing new development at the West End of the district, including a further new community, on-going development of Cranbrook and other major strategic developments close to Exeter. The West End is not a spatially defined policy area with a line on the Policies map, rather it is a term that applies to development proposals and site allocations referred to in this Chapter of the plan.

B. Promoting the most significant development levels, other than at the West End where the highest levels of growth are proposed, at the Principal Centre of Exmouth.

C. Promoting significant development at the Main Centres of Axminster, Honiton, Ottery St Mary, Seaton, and Sidmouth to serve their own needs and that of the wider surrounding areas;

D. Supporting development at the Local Centres of Broadclyst, Budleigh Salterton, Colyton, Lympstone, and Woodbury that meets local needs and those in the immediate surroundings;

E. Allowing limited development at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill and Whimple.

Settlements not listed above, with the exception of Broadclyst Station which is addressed through the Cranbrook Plan, are defined as in 'open countryside' for the purposes of the Local Plan. The open countryside definition also excludes any location

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that falls in a defined settlement boundary or any site or area of land that is explicitly allocated or identified in the Development Plan for built development. In the open countryside more restrictive planning policies apply.

This policy applies to all of the Cranbrook Plan area.

Justification for policy

3.2. The Local Plan promotes a sustainable development pattern that aligns growth with infrastructure. The NPPF (paragraph 20) requires strategic policies to set out an overall strategy for place-making, focusing significant development on sustainable locations that reduce travel needs and offer transport choices.[4]

3.3. The NPPF states that in rural areas, housing should enhance or maintain the vitality of rural communities, with policies identifying opportunities for villages to grow and thrive.

3.4. The spatial strategy creates a carefully considered settlement hierarchy, grouping settlements together where they share similar characteristics in terms of population, employment, and community facilities and services, as outlined below: [5]

- The 'West End': A highly sustainable area that has seen significant development since 2010, with substantial residential growth, employment opportunities, and strong functional links to Exeter. This zone offers extensive infrastructure, proximity to urban services, and efficient transport connections, making it a prime location for strategic development.
- Principal Centre - Exmouth: The district's largest settlement, distinguished by its significantly higher population, diverse job market, and comprehensive range of community services and facilities that serve both local and wider regional needs.
- Main Centres - Axminster, Honiton, Ottery St Mary, Seaton, Sidmouth: Settlements with strategic and local facilities that serve both their immediate area and surrounding communities, offering a balanced mix of jobs, services, and growth potential.

[4] National Planning Policy Framework, Dec 2023, paragraph 11a, 20a: *link to NPPF on EDDC when uploaded*

[5] GEV-001 - The Role and Function of Settlements, https://democracy.eastdevon.gov.uk/documents/s13843/1a.%20Role%20and%20Function%20of%20Settlements_report_v3%20final%20draft%20for%20SPC.pdf

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- Local Centres: Settlements with reasonable population levels and a smaller but important selection of strategic and local facilities, playing a crucial role in supporting local community infrastructure.

- Service Villages: 23 settlements with good local facilities, providing essential services and infrastructure for their immediate rural areas and supporting more localised, sustainable development.

3.5. Other settlements have a more limited level of jobs and facilities and, for the purposes of the Local Plan, fall within 'open countryside' where development is restricted to certain circumstances such as rural exception sites, community-led development (for example through a neighbourhood plan), and rural workers dwellings.

3.6. The spatial strategy promotes a sustainable pattern of development that balances development needs with environmental constraints, with approximately half of new homes planned at the West End . The strategy prioritises development in sustainable locations while protecting the district's outstanding open countryside and coastal environment.

3.7. Policies in later chapters in the plan show where land is allocated for development. The Site Selection methodology explains how sites have been identified, assessed, and chosen for allocation or not.[6] Housing sites have only been considered for allocation where consistent with the spatial strategy set out in Strategic Policy SP01, with slightly more flexibility for the location of employment allocations if they are located in close proximity to existing employment sites. New residential development at Cranbrook is outside the scope of the Local Plan, as it is addressed in the Cranbrook Plan (adopted

[6] SAL-001 – Site Selection Methodology, https://eastdevon.gov.uk/media/3724949/site-selection-methodology-v2.pdf

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October 2022). Therefore, sites within or adjoining the Cranbrook Plan area are not considered for allocation in the Local Plan.

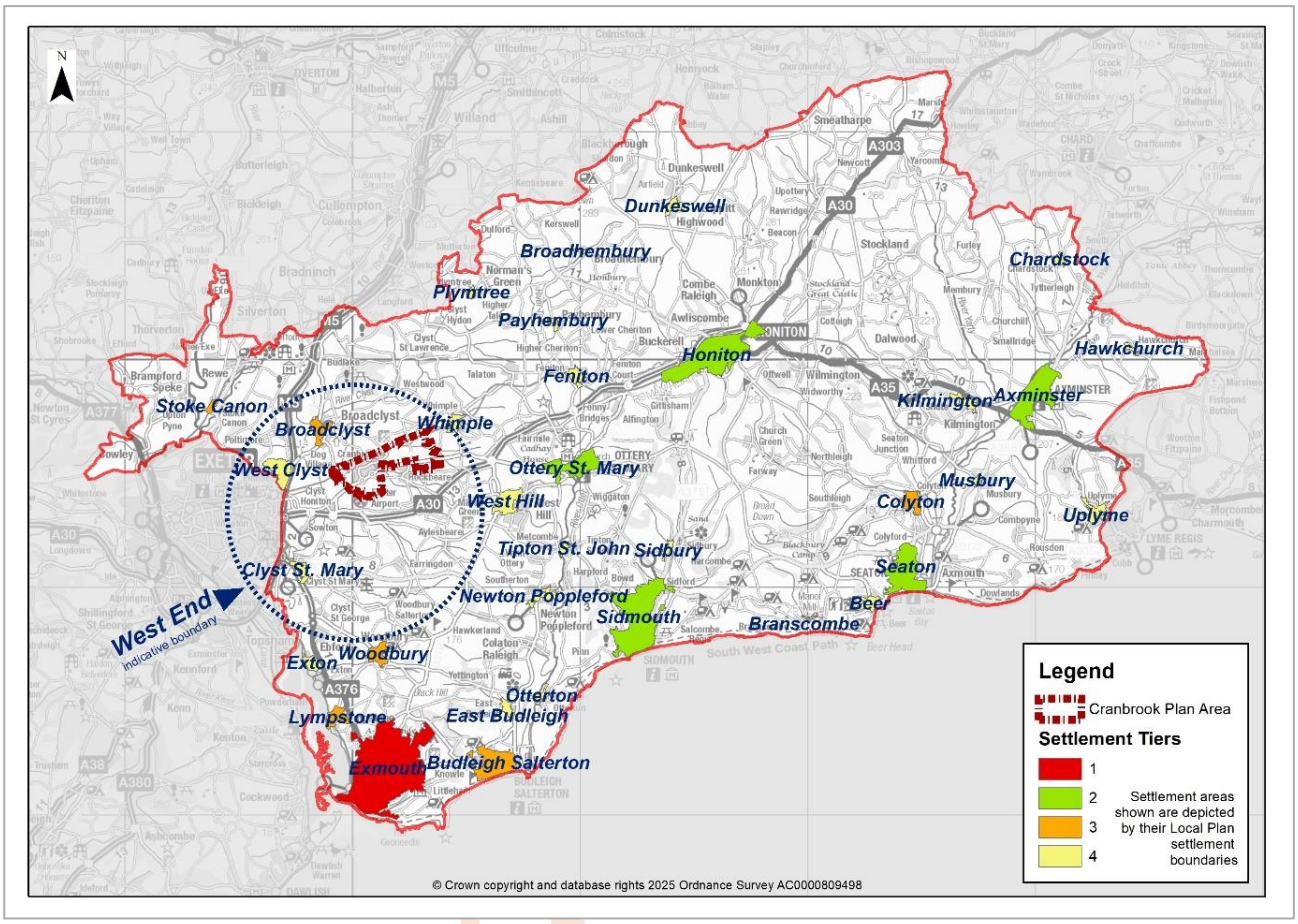


FIGURE 4 Plan showing Principal Centre of Exmouth (Tier 1), Main Centres of Axminster, Honiton, Ottery St Mary, Seaton, and Sidmouth (Tier 2), Local Centres (Tier 3) and Service Villages (Tier 4)

Levels of future housing provision

3.8. Delivering a sufficient supply of homes' is an NPPF policy theme. The NPPF requires Local Plans to identify and meet as a minimum the objectively assessed development needs for their area. The purpose of this strategic policy is to set out what the housing development requirements are for East Devon for the plan period. This is central to the council's 'plan, monitor and manage' approach to housing development.

Strategic Policy SP02: Levels of future housing development

The Local Planning Authority will plan, monitor and manage the delivery of housing development in accordance with the spatial strategy and the site allocations set out in

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this plan, and other adopted or made Development Plan Documents in the district, including Neighbourhood Plans.

Housing provision will be made for at least 20,909dwellings (net) to be delivered in the plan area between 1 April 2020 to 31 March 2042. The housing requirement will be delivered through a stepped trajectory, with an annual target of 850 homes from 2020/21 to 2031/32, increasing to 1070 homes per year from 2032/33 to 2041/42.

This policy applies to all of the Cranbrook Plan area but does not supersede any Cranbrook Plan policies.

Justification for policy

3.9. The policy responds to the Council's priority of addressing housing needs by establishing a clear housing requirement based on the Standard Method using latest ONS statistics. It provides for a minimum number of new dwellings with an added flexibility headroom, supporting the government's objective of significantly boosting housing supply and aligning with the local plan's vision and spatial strategy.

3.10. The housing requirement encompasses an annual housing provision of 950 dwellings. With a target of approximately 4,070 affordable dwellings for 2020 to 2040, we have uplifted this figure by 10% to account for the years 2040 to 2042 giving a gross total, for 2020 to 2042, of 4,477, which is justified by the latest evidence of affordable housing need[7].

3.11. The Local Plan housing provision follows transitional arrangements set out under the December 2024 redraft of the NPPF. The new standard method generates an annual average housing number (at February 2025) of 1,188 dwellings. Providing for 80% of this (para 234 of the December 2024 NPPF) generates the annual average housing level of 950.4 new homes, a 22-year plan requirement of 20,909. Projected delivery from all sources, from a monitoring base position of 1 April 2024 – those already built, those with permission, projected future windfalls and allocations in this plan provide for 22,614 homes. Of these 3,514 have been built which if deducted from gross projections leaves a net delivery of 19,100 and a net need, with the same subtraction, of 17,395. Deducting the net need from net delivery generates a 'surplus' of 1,705, this

[7] Based on the scale of affordable housing in Sensitivity Test 3 shown in Figure 57 in: HOU-002 - East Devon Local Housing Needs Assessment: https://eastdevon.gov.uk/media/3724890/east-devon-lhna-final-accessible-160922.pdf

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figure expressed as a percentage of net need gives a healthy headroom surplus of 9.8% that will account for any possible non-delivery.

3.12. In recognition of the complexities inherent in delivering major development sites, particularly the proposed new community provision of new homes will come forward under a stepped trajectory that will provide an annual average of 850 dwellings per year from 2020/21 to 2031/32 and 1,070 per year from 2032/33 to plan end at 2023/24. A housing technical assessment paper provides more detail on housing numbers and provision.[8]

3.13. The housing trajectory is illustrated in Appendix 1 as is 5-year land supply forecast at the anticipated point of plan adoption.



FIGURE 5 New homes at Clyst St George

[8] HOU-001 - Housing Delivery Technical Report Jan 2025

3.14. Detailed evidence supporting this policy can be found in the 2022 Housing Need, Supply and Requirement Interim Topic Paper[9],. The local plan housing supply will provide for a level of workers, given job growth assumptions in the plan, that aligns with the future workforce that housing will accommodate. Assessment is set out in a Jobs and Workers Balance Assessment[10] (noting there would be a surplus of workers at the sub-regional level).



FIGURE 6 Homes under construction.

Housing requirements in Designated Neighbourhood Areas

3.15. This strategic policy establishes housing requirements for the 42 currently Designated Neighbourhood Areas (DNAs) in East Devon, in line with government policy. It

[9] KSD-010 - 2022 Housing Need, Supply and Requirement Interim Topic Paper: https://eastdevon.gov.uk/media/3724865/htp-east-devon-housing-need-supply-requirement-interim-topic-paper.pdf

[10] ECN-010 - East Devon, Exeter, Mid Devon and Teignbridge Local Housing Needs Assessment: Jobs and Workers Balance Assessment – https://eastdevon.gov.uk/media/nluaf5ws/ecn-010-jobs-and-workers-balance-assessment.pdf

provides a framework for neighbourhood planningthat reflects the district's spatial strategy for housing development,.

Strategic Policy SP03: Housing requirement by Designated Neighbourhood Area

Housing requirement figures for Designated Neighbourhood Areas for the purposes of neighbourhood planning are as follows:

Designated Neighbourhood Area (as of December 2024, in alphabetical order)	Total (minimum) Housing Requirement (01/04/20 to 01/04/42) - All supply sources (completions, commitments, DPD allocations (Cranbrook, Local Plan (excluding second new community), and neighbourhood plans)	Minimum Contribution from Emerging/future Neighbourhood Plans (not Made or Recommended to Referendum at December 2024)
All Saints	2	0
Axminster	1,409	0
Axmouth	4	0
Aylesbeare	8	0
Beer	44	0
Bishops Clyst (Clyst St Mary and Sowton)	169	72
Broadclyst	2,382	0
Broadhembury	39	0
Budleigh Salterton	132	0
Chardstock	30	0
Clyst Honiton	11	0
Clyst St George	599	0

Colyton and Colyford	169	0
Cotleigh	0	0
Dalwood	2	0
Dunkeswell	72	0
East Budleigh with Bicton	30	0
Exmouth	2,311	0
Farringdon	5	0
Feniton	127	0
Hawkchurch	17	0
Honiton	839	0
Kilmington	59	0
Luppitt	2	0
Lympstone	323	0
Membury	4	0
Monkton	1	0
Newton Poppleford	76	0
Otterton	27	0
Ottery St Mary	483	0
Payhembury	38	0
Plymtree	42	0
Rockbeare	806	0
Seaton	522	0
Sidmouth (Sid Valley)	471	0
Stockland	3	0

Uplyme	44	0
Upottery	3	0
West Hill	70	0
Whimple	611	0
Woodbury	365	0
Yarcombe	6	0

These figures represent the minimum housing development in each of the Designated Neighbourhood Areas over the plan period. Proposals for additional housing, including through allocations in neighbourhood plans to meet a specific local need will be supported where they are in accordance with other strategic policies in this Plan and supported by appropriate evidence. For future new (and/or amended) Designated Neighbourhood Areas (noting some parts of East Devon are currently not designated), the Local Planning Authority will provide an indicative figure, if requested to do so by the neighbourhood planning body.

A breakdown of the total housing requirement by supply category is given in Appendix 2.

This policy applies in the Cranbrook Plan area, specifically to the parts of the Cranbrook Plan area that form parts of the above listed designated neighbourhood areas.

Justification for policy

3.16. The housing requirements included in this policy are calculated using a comprehensive methodology that accounts for housing completions, existing commitments, and site allocations from development plans to show the expected scale of housing development over the plan period. They contribute to the district's overall housing provision requirements and strategy. It gives the figures for all parts of East Devon that currently have designated Neighbourhood Areas and provides a basis for doing so on request for other areas, as required to support neighbourhood planning.

3.17. The policy is designed to provide clarity and flexibility for local communities. The housing figures are minimum requirements, not maximum limits, allowing for potential further windfall development where it accords with other policies in the plan and enabling neighbourhood plans to allocate additional sites and exceed the specified numbers. Neighbourhood planning bodies are encouraged to consider making site allocations and there may be advantages in doing so, but there is no mandatory

obligation. Similarly, there is no obligation for neighbourhood plans to address any shortfall that may arise

3.18. Housing supply figures are based on the 2024 monitoring point (to 31st March 2024) and represent net new dwellings, allowing for units lost to demolition or conversion. Housing numbers related to the second new community are not included as they are not available by individual Neighbourhood Area.

3.19. In addition to that given in Appendix 2, a more detailed breakdown of housing requirements for each Neighbourhood Area[11] is available on the East Devon District Council website. Monitoring will be undertaken annually through the Housing Monitoring Update[12]. The local planning authority will support communities in considering the need for, and scope and content of, new or reviewed neighbourhood plans in applying and monitoring this policy.

Policy for employment provision and distribution

3.20. This section outlines the local plan's economic strategy and employment policy approach, focusing on creating a resilient, sustainable, and inclusive economy for East Devon. The approach aims to support economic growth while addressing key challenges such as low wages, changing workforce dynamics, and the transition to a net-zero economy.

3.21. The strategy emphasises supporting innovation, attracting new sectors, and modernising existing industries. Key priorities include fostering transformational sectors, supporting local businesses, and creating opportunities for well-paid, productive careers. Particular attention is given to emerging technologies, green industries, and adapting to changes like increased homeworking and artificial intelligence.

3.22. The plan recognises significant economic challenges, including the loss of major employers, lower-than-average wages, and demographic shifts with an ageing population. It seeks to address these by promoting economic diversification, supporting new communities, and ensuring land and infrastructure are available to support business growth and innovation.

[11] HOU-014 – Detailed Tables of DNA Housing Requirements by DNA, *link when published*
[12] KSD-003 – Annual Monitoring Report, https://eastdevon.gov.uk/planning/planning-policy/monitoring/

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3.23. Central to the strategy is a commitment to sustainable development, balancing economic prosperity with environmental protection and social well-being, while preparing for future economic and technological transformations.

3.24. To support job opportunities and business growth, the local plan must ensure a strategic approach to employment provision and land supply. Employment allocations are shown on the Policies Map. For information purposes other significant employment sites[13] are also identified but this is not a comprehensive list of all areas to which employment policies will apply.

Strategic Policy SP04: Employment provision and distribution strategy

The Council is committed to achieving high quality, high value jobs in East Devon, close to people's homes. Employment provision will consist of:

A. Sites allocated in this plan (not at new communities) – 90.66 hectares
B. Sites at Cranbrook – 19.2ha
C. Sites at 2nd new community (up to 2042) – around 17.5ha
D. Sites built 2020-2024 – 6.8ha
E. Sites with planning permission or under construction at 2024- 44ha
F. Total- 178.16ha
G. In addition, windfall sites are likely to come forward in accordance with other plan policies

This level of provision gives range and choice when measured against a quantified forecast need of 80 hectares set out in the Economic Development Needs Assessment[14] (mid-point clean growth scenario) and ongoing monitoring work.

Employment uses will include:

[13] These sites are identified in: ECN-004 - 2023 Employment Land Review, https://eastdevon.gov.uk/media/di2lpadk/employment-land-review-2021-23-published.pdf

[14] ECN-001 Greater Exeter Economic Development Needs Assessment, https://eastdevon.gov.uk/media/flflexie/greater-exeter-edna-final-report-combined-v2-0.pdf

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E(g)(i) Office use - to be primarily located in the town centres of tier 1 and 2 settlements and the proposed new community. Office use will be permitted on site allocations as an ancillary part of other business uses.

E(g)(ii) Research and Development and **(iii) industrial use** (which can be carried out in any residential area without causing detriment to the amenity of the area)- will be met through employment site allocations, alongside larger housing developments as allocations and as windfall development.

B2 General Industrial use - the majority of this provision will be met through site allocations in the West End.

B8 Storage and Distribution use - the majority of this provision will be met through site allocations in the West End.

Other employment generating development, such as sustainable green rural tourism and leisure development will be permitted in accordance with other Plan Policies.

Existing employment areas that will continue to be the primary locations for industrial, warehousing, offices, distribution development and other B Class Uses are identified on the Policies Map. Employment site allocations are identified on the Policies Map and will be subject to site specific Policies in the plan.

This policy applies to all of the Cranbrook Plan area.

Justification for policy

3.25. The Council Plan and Economic Development Strategy highlight that a resilient economy promotes prosperity and reduces hardship. This policy ensures adequate employment development for the plan period, meeting the needs of new and growing businesses, locating quality jobs near communities, and collaborating with partners to supply quality employment spaces.

3.26. The EDNA evaluates East Devon's employment land needs for 2020-2040, focusing on offices, industry, and warehousing. It concludes a need for 7 ha of land for offices, 65 ha for industrial use, and 8 ha for logistics. These fall under Use Classes B2, B8, and E(g).

3.27. The Plan allocates suitable sites to meet employment floorspace requirements, offering flexibility and choice. Most sites support mixed B2, B8, and E(g) uses, except in residential areas where general industry and warehousing/logistics are restricted to protect local amenity.

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Policy reference and address	Uses permitted	Amount of employment land (ha)
Allocations in the West End		
Strategic Policy WS01: Development of a second new community east of Exeter (up to 2042- with a further 30ha post 2042)	Not Specified	17.5
Strategic Policy WS04: Land north of the Science Park (Brcl_23)	E(g)(iii)	2
Strategic Policy WS06: Employment land to the east of the airport buildings (Site GH/ED/43, GH/ED/45 and Rock_09a)	B2, B8, E(g)	24.34
Strategic Policy WS07: Employment land north of the Airport, adjoining Treasbeare (Clho_09)	B2, B8, E(g)	15.3
Strategic Policy WS08: Employment land opposite the airport buildings, south of the A30 (site Farr_01)	B2, E(g)	1
Strategic Policy WS10: Development next to the M5 and north of Topsham	Not specified	2.4
Strategic Policy WS12: Employment land at Sandygate, between the M5 and Clyst Road (site Clge_07)	B2, E(g)	0.7
Strategic Policy WS13: Employment land at Lodge Trading Estate, Station Road, Broadclyst (site Brcl_27a)	B2, E(g)	1.89
Strategic Policy WS14: Employment land south of Langdon's Business Park, Clyst St Mary (site Sowt_15a)	B2, B8, E(g)	1
Strategic Policy WS15: Employment land at Darts Farm (Clge_23 and Clge_25a)	E(g)	2.13
Allocations at Tier 1-2 Settlements Note - land is not allocated at Sidmouth as a large employment site already has an extant planning permission		

Strategic Policy SD01: Exmouth and its future development:		
Land to the South of Littleham (Exmo_17)	E(g)	1.6
Land directly to the East of Liverton Business Park (Exmo_18)	B2, B8, E(g)	2.7
Land at St John's (Exmo_20b)	E(g)(iii)	2
Land at Courtlands Cross (Lymp_07)	E(g)(iii)	0.4

Strategic Policy SD02: Axminster and its future development:		
Prestaller Farm, Beavor Lane (Part of GH/ED/80)	E(g)(iii)	1
Land west of Chard Road (GH/ED/83)	E(g)(iii)	0.8
Land west of Musbury Road (Axmi_01a)	B2, B8, E(g)	2

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Land east of Musbury Road (Axmi_02 and Axmi_08)	E(g)(iii)	0.6
Land at Axminster Carpets (Axmi_07)	E(g)	Up to 0.5
Great Jackleigh Farm (Axmi_09)	E(g)	1
Land east of Lyme Close (Axmi_11a)	E(g)	0.4

Strategic Policy SD03: Honiton and its future development:		
Land on the western side of Hayne Lane, Gittisham (Gitti_03)	B2, B8, E(g)	5.5
Land to the West of Combe Garden Centre, Gittisham (Gitti_04)	B2, B8, E(g)	9.1
Employment Land within the Existing Heathpark Industrial Estate- plots 11A,11B,11D and 11M	B2, B8, E(g)	3.3

Strategic Policy SD04: Ottery St Mary and its future development		
Barrack Farm (Otry_01b)	E(g)(iii)	1.25

Strategic Policy SD05: Seaton and its future development:		
Land off Harepath Road (Seat_05)	E(g)	2.2

Allocations at the Tier 3 and 4 Settlements		
Strategic Policy SD07: Development at Broadclyst (Brcl_12)	E(g)	0.6
Strategic Policy SD17: Development at Feniton (Otry_20)	B2, B8, E(g)	4.64
Strategic Policy SD18: Development at Hawkchurch (Hawk_01)	E(g)	0.25
Strategic Policy SD20: Development at Musbury (Musb_01a)	E(g)(i)	0.06

3.28. The policy ensures sufficient employment land is allocated to support economic growth. The Council will monitor and seek to maintain an appropriate mix of uses throughout the plan period.

3.29. West End employment sites and new communities support high-value jobs and strategic inward investment, especially in emerging technology sectors. Employment growth at Tier 1-4 settlements aims to meet local needs and improve self-containment. New jobs will be required alongside new housing on larger development allocations.

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Settlement Boundaries

3.30. Settlement boundaries are essential for identifying areas suitable for development. They serve three main purposes:

- Define where development is acceptable to promote sustainable development.
- Control the scale and location of development to implement the plan strategy.
- Prevent unregulated development in the countryside and open areas.

Strategic Policy SP05: Development inside Settlement Boundaries

Within the settlement boundaries defined on the Policies Map development will be supported in principle. This does not mean that all development will be acceptable within settlement boundaries: proposals will be considered on their own merits having regard to other policies in this plan and any made neighbourhood plan.

This is a strategic policy and significant changes to the boundaries defined through neighbourhood planning would be incompatible with it. However, neighbourhood plans that propose modest adjustments to the settlement boundaries to increase the opportunities for additional development are likely to be compatible with this policy.

This policy does not apply in the Cranbrook Plan area noting that Plan has defined Built-up Area Boundaries and associated plan policy.

Justification for policy

3.31. Settlement boundaries direct growth to areas that align with our plan objectives, providing clarity on where development is likely to be acceptable. This offers certainty to decision makers, local communities, landowners, and developers.

3.32. Settlement boundaries have been established around Tier 1 to Tier 4 settlements (excluding Stoke Canon which is wholly in flood zones 2 and 3). Large strategic development sites may also have boundaries or clear allocations for development. The Settlement Boundaries Topic Paper (KSD-011)[15] details the rationale for their delineation.

[15] KSD-011 – Settlement Boundary Topic Paper, *Link when published*

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3.33. These boundaries help manage growth patterns in line with national planning guidance, guiding but not stifling outward growth. Some built-up areas may be excluded from these boundaries if deemed inappropriate for additional development. Outside settlement boundaries, development is more restricted under separate plan policies.

Land outside of settlement boundaries

3.34. East Devon is predominantly rural, renowned for its outstanding natural environment. Our strategy directs growth to the new communities and Tier 1 to Tier 4 settlements, aligning with the National Planning Policy Framework (NPPF) to promote sustainable development. This approach ensures development is concentrated in areas with existing infrastructure and services

Strategic Policy SP06: Development beyond Settlement Boundaries

In locations outside of the defined settlement boundaries development will not be permitted unless it is in accordance with a specific Local or Neighbourhood Plan policy that explicitly permits such development.

This policy applies in the Cranbrook Plan area for all locations that fall outside of the Built-up Area Boundaries set out in the Cranbrook Plan.

Justification for policy

3.35. This policy is crucial for implementing the local plan strategy, managing growth in line with national planning policy. By focusing development within defined settlement boundaries, we promote sustainable development patterns and limit inappropriate development elsewhere. This helps to maintain the character and quality of East Devon's rural areas and natural landscapes.

3.36. Settlement boundaries provide clarity and certainty for decision makers, local communities, landowners, and developers about where development is likely to be acceptable. This policy supports the strategic focus on sustainable growth while balancing the needs of rural communities for appropriate development opportunities.

3.37. Land outside settlement boundaries is treated as 'countryside' in planning terms, even if it includes built-up areas. Such areas are generally unsuitable for development unless explicitly permitted by separate policy in the plan. This approach allows for flexibility to meet specific needs, such as affordable housing to address local needs or the

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conversion of existing buildings, while ensuring that development is controlled and sustainable. This balance is essential to protect the rural character and environmental quality of East Devon while accommodating necessary growth.

Infrastructure

3.38. Effective infrastructure delivery is crucial for supporting new development and ensuring the well-being of the wider community. This policy outlines the requirements for infrastructure provision in new development proposals.

Strategic Policy SP07: Delivery of infrastructure

New development proposals must be supported by appropriate infrastructure, delivered in a timely manner to support the needs of the development and the wider community. Applications will be required to:

A. Assess the infrastructure requirements arising from their development.

B. Provide or contribute towards necessary infrastructure improvements, either through direct provision or financial contributions.

C. Ensure that infrastructure to be delivered by the development is delivered in parallel with the progress of the development.

D. Coordinate with relevant service providers and the Local Planning Authority to ensure efficient and effective infrastructure delivery.

E. Consider the long-term maintenance and management of new infrastructure.

Where appropriate, the Council will use planning conditions or planning obligations to secure the provision of infrastructure and its ongoing maintenance.

This policy applies in the Cranbrook Plan area noting that the Cranbrook Plan also sets out Cranbrook bespoke requirements.

Justification for policy

3.39. Proper infrastructure provision is essential for creating sustainable communities that meet the needs of residents and businesses. Adequate infrastructure supports a high quality of life and ensures access to essential services and amenities.

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3.40. Well-planned infrastructure attracts investment and supports economic growth. It also helps mitigate environmental impacts, such as through sustainable drainage systems or green transport options.

3.41. The East Devon Infrastructure Delivery Plan (IDP)[16] provides a comprehensive assessment of the district's infrastructure needs and priorities. Developers should consult the most recent version of the IDP when assessing infrastructure requirements for their proposals.

3.42. This policy aligns with the National Planning Policy Framework (NPPF) requirements for plan-making and the use of planning obligations. By requiring developers to contribute to infrastructure needs, the policy ensures that the cost of supporting growth does not fall disproportionately on existing communities.

3.43. A coordinated approach to infrastructure delivery is encouraged, promoting collaboration between developers, the local authority, and service providers. Considering the long-term maintenance of infrastructure helps ensure the ongoing viability and effectiveness of new facilities and services.

3.44. Additional homes create the need for additional education provision including primary and early years, secondary and special education need school paces. There are also implications for home to school transport. This education impact of development must be fully mitigated by financial contributions in order for development to be acceptable in planning terms

Infrastructure Provision

3.45. Delivering infrastructure alongside housing and economic development is crucial for sustainable communities. This includes essential services like transport, flood risk measures, utilities, and habitat mitigation, as well as daily access to education, health, open spaces, and play areas.

3.46. Infrastructure funding can come from various sources:

- **Direct Provision by Developments**: New developments must address their direct impacts by providing or funding necessary infrastructure.

[16] KSD-001 – Infrastructure Deliver Plan, *Link when Published*

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- **Planning Obligations (Section 106 Agreements)**: Legal agreements where developers contribute to infrastructure.
- **Community Infrastructure Levy (CIL)**: A charge on new developments collected for future infrastructure projects.
- **Government Grants or Loans**: Funding from national or local government.
- **Utilities Companies and Central Government**: Funding from statutory organisations and central government for specific projects like flood protection.

3.47. As the local plan progresses, detailed assessments of infrastructure needs and provision plans will be required.

Phased Delivery of Infrastructure and Services

3.48. Developments are often built out in phases by different developers and require co-ordination between them to ensure their timely and co-ordinated delivery.

Strategic Policy SP08: Phased Delivery of Infrastructure and Services

Developments that are being brought forward in phases or parcels by multiple developers must be designed so that each phase or parcel provides pedestrian, cycling and vehicular access up to the boundaries of each development parcel/phase. Such developments shall also ensure that all services including electricity, water, sewerage, broadband and district heating services (where applicable) are also delivered up to the boundaries of each phase or parcel.

Delivery of services shall be co-ordinated with providers to ensure that adequate capacity can be provided to service future phases/parcels without the need for retrofitting.

The pedestrian, cycling and vehicular access links and services must be built to adoptable standards (and included in agreements under s38 of the Highways Act 1980 where they are to be adopted by the highway authority). Services must be built to regulatory standards and details of appropriate mechanisms for in perpetuity management and maintenance, with adoption by a regulatory body being the preference, will be subject to the agreement of the local planning authority.

The delivery of these links and services shall be in accordance with any masterplan and phasing plan for the overall development (unless otherwise agreed) and will be secured in s106 agreements to ensure that they are provided in a timely manner.

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This policy will apply in the Cranbrook Plan area noting that the Cranbrook Plan also sets out Cranbrook bespoke requirements.

Justification for policy

3.49. It is important to ensure that both above and below ground services and infrastructure link up between different parcels of phased developments to ensure that no party is held to ransom by another at the expense of the quality of the development. This policy seeks to ensure that adequate links between parcels are provided, in the interests of facilitating a comprehensive movement network and to avoid unnecessary delay, cost, retrofitting and disruption in the delivery of adjoining phases or parcel.

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Development at the West End



Chapter 4. Development at the West End

4.1. The West End of East Devon, near Exeter, has seen significant development recently. This local plan continues to support high growth in this area, with projects including district heating, green infrastructure, the Growth Point programme, the Enterprise Zone, improved highways, and climate emergency responses. Past policies focused on this area due to development constraints in other parts of East Devon, with much of the district in designated National Landscapes. The existing built environment near Exeter provides jobs, services, infrastructure, and market demand for housing and employment development. These factors remain relevant, with much future development already planned or underway, particularly at Cranbrook. The West End, and its growth, will provide economic and job benefits, including in respect of enhancing skill levels and education and training, for all of East Devon and a wider area.

4.2. Continued growth in the West End will make use of existing infrastructure and necessitate provision of additional facilities, especially for the second new community. The 'West End' is not defined by a map line but refers to development proposals and sites referenced in this chapter.

The ongoing development and potential for expansion of Cranbrook

4.3. Cranbrook is a new community under construction on the western side of East Devon, about 5 km from the M5 Motorway and Exeter City boundary. Since starting from a green field in 2011, it has grown to around 3,000 homes by the end of 2024. The Cranbrook Plan includes policies to expand the town to nearly 8,000 homes.

4.4. Cranbrook will continue to develop under the adopted Cranbrook Plan, with selected policies from this local plan also applicable. The Cranbrook Plan has an end date of 2031, and a new plan will supersede it before then.

Planning for a second new community

4.5. To accommodate significant housing growth, the local plan allocates land for a new community at the West End. Extensive research and assessment have identified and allocated a site for the new community, shown on the Policies Map.

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4.6. In technical assessment work East Devon Options Appraisal Report[17] there is a vision of the new community, this states:

A second new community in East Devon with a self-sufficient, healthy and dynamic community with distinctive character. Delivering up to 8,000 high-quality homes with a range of tenures, places of work and a diverse mix of uses that are easily accessible via sustainable and active travel such that these become the dominant transport modes.

This new community will be more than just a settlement, it will be an ambitious and highly desirable place that supports the growth of a self-governing and self-sustaining community that establishes its culture at the outset in order to develop and thrive into the future.

The structure of the settlement will promote innovative design that will draw inspiration from the local context, including the unique surrounding historic environment, to create a rich character. Streets and spaces will be designed to encourage social interaction and will be embedded in a well-connected and integrated active travel network with comprehensive links to nearby employment, surrounding countryside and the city of Exeter.

It will be underpinned at its core by sustainability, wellbeing, and healthy living, creating an exemplar zero-carbon town both in terms of self-sufficiency and design and by doing so it will provide a legacy to the benefit of future generations.

This sustainable community will be sensitively and seamlessly integrated with the outstanding East Devon natural environment and contribute to the delivery of the Clyst Valley Regional Park whilst protecting nearby internationally recognised habitats.

It will provide a rich network of substantial open space and diverse landscaping, including areas of enhanced ecology and biodiversity, as well as opportunities for play, recreation and opportunities for food growing.

This vibrant and adaptable new community will preserve East Devon's legacy as an outstanding place to live. The use of local materials and labour will be promoted to deliver on local priorities, creating somewhere residents can be proud of and where people of all ages and lifestyles will prosper.

[17] GEV-003 - East Devon – Options appraisal for a potential new settlement, https://eastdevon.gov.uk/media/ff1fcr4s/gev-003-a-options-appraisal-for-a-potential-new-settlement.pdf

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Strategic Policy WS01: Development of a second new community east of Exeter

To meet the needs of a growing population a new community will be developed on the western side of East Devon. The new community will be a long-term strategic development scheme that will start being built during the life span of this local plan but development will extend beyond the life of this plan.

Ultimately the new community will need to accommodate at least 10,000 new homes and associated mixed use development and infrastructure. In the first instance, the land allocated in this plan further to this policy is for the new community to accommodate at least 8,000 new homes, some to be completed before 2042 and some after. The further land to be allocated to accommodate greater housing numbers and associated mixed use development and infrastructure so the new community can accommodate at least 10,000 new homes will be determined through further work and be set out in subsequent development plans.

For the first 8,000 new homes, and supporting facilities and development, land is allocated, as shown on the Policies Plan. This policy sets out requirements to get to this scale of development but all planning and infrastructure capacity and needs work for the new community should take into account accommodating greater levels of development, to accommodate at least 10,000 new homes and associated development.

Development will need to occur and proceed on the basis of an agreed whole new community masterplan and on an agreed phased basis. The new community will be built to distinctive high quality design standards with an explicit focus on sustainable construction and building operation and renewable energy production and use. Open spaces and facilities will be readily accessible to all residents with convenient and attractive pedestrian and cycle links within the site and to local destinations and access to high quality public transport services.

Working with our partners we will promote development starting in this plan period but also extending over the longer term (beyond the lifespan of this local plan) to accommodate the following:

New homes

Up to 2042 - Around 3,300 new homes on allocated land.

Beyond 2042 – Around 4,700 additional new homes on allocated land.

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Noting that at least a further 2,000 new homes and associated development will also be required to be accommodated in the longer term to be allocated in subsequent development plans.

New homes will need to be of the highest standards in terms of energy and resource efficiency, quality of design and access to services and facilities while making efficient use of land.

The allocation-wide Masterplan will set out the required levels of affordable housing, mix and size of housing and tenure types and area densities, which are expected to be:

A. affordable housing provision in accordance with strategic policy HN02;

B. a mix of types and sizes of market housing in accordance with strategic policy HN01; and

C. a site-wide average density of at least 45 dwellings per hectare.

High density housing of at least 55- 60 dwellings per hectare will be required within the town centre, neighbourhood centres and around key destinations and transport hubs.

Gypsy and Traveller Provision

Up to 2042 – One or more sites accommodating at least 15 pitches.

Beyond 2042 – One or more additional site or sites accommodating at least 15 additional pitches.

Provision will be required in line with 'bricks and mortar' housing development and must be integrated with the new community's overall development proposals

Jobs

Up to 2042 – At least 17.5 hectares of land in office, industrial and warehouse sectors (E, B2 and B8).

Beyond 2042 – Around 30 hectares of land in office, industrial and warehouse sectors (E, B2 and B8).

Employment provision shall be made throughout the town to provide a range of spaces suitable for the needs of businesses as they develop and grow and to accommodate a range of employment opportunities for residents of the new community and surrounding areas.

Serviced or otherwise available land should be available for occupation by employment uses on a phased basis that is directly proportionate to house building occupations.

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Town Centre

Up to 2042 – Allocation of 15 hectares of land for a town centre with completion of at least 5 hectares of land with completed and operational town centre uses, specifically to include retail, business and leisure uses.

Beyond 2042 – Completion of additional town centre development to occupy a grand total of at least 15 hectares of land (pre and post 2042 development).

A town centre will provide a focal point for retail, business and leisure activities and will be designed to create a vibrant day and night-time economy and this will be complemented by a series of smaller neighbourhood centres that will be built out alongside the homes that they serve.

Social, Community and Education Facilities

Accommodate a full range of social, cultural, sport, leisure, health, community and education facilities (including new primary schools and an education campus which will provide primary and secondary school places as well as provision for early years, pupils with special educational needs and Post 16) to meet the needs of all age groups that will live at the new community. Timely delivery of education infrastructure is essential. The education infrastructure planned for the new community will provide for a wider area in order to meet the needs of the plan. To specifically include 23 hectares of land for education provision.

Infrastructure

Infrastructure provision will need to come forward with overall development proposals. This will include at least 254 hectares of land for green [and blue] infrastructure provision (including approximately 150Ha of Suitable Alternative Natural Greenspace (SANG) to meet Habitat Regulations requirements. The Council will produce an Infrastructure Delivery Plan that will set out key requirements recognising the need for improved transport links, public rights of way network, cycle networks, bus services and road improvements, community energy/heating provision, on-site renewable energy generation, drainage and SUDS requirements, new education provision, high speed broadband and other services and facilities to ensure sustainable development is delivered.

Developments shall be developed in a phased and co-ordinated manner alongside the required infrastructure and in accordance with parameter plans for the new community which will be developed in partnership with developers and the community.

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Proposals to develop land within the new community must progress in accordance with an allocation-wide masterplan, Infrastructure Delivery Strategy (to accord with the Infrastructure Delivery Plan produced by the Council), Phasing Strategy and Financial Appraisal which will have been submitted to and approved by the local planning authority prior to commencement of any development. Each planning application to be determined within the allocation area should accord with such approved documents unless otherwise agreed by the local planning authority. The allocation-wide Infrastructure Delivery Strategy will demonstrate that the development of the whole of the allocation area will deliver, in a timely manner, sufficient infrastructure to cater for the needs of the new community as a whole and also mitigate to an acceptable level the effects of the whole development upon the surrounding area and community.

Each planning application shall incorporate details of phasing and trigger levels for the provision of required infrastructure consistent with this policy and the Infrastructure Delivery Strategy. This must include proposals for the number and phasing of dwellings to be permitted, and the timing of housing delivery to be linked to the planned delivery of infrastructure. This will be regulated through the planning application process. Ad hoc or piecemeal development which is contrary to the aims of this policy or development that is inconsistent with the required masterplan for this site will not be permitted. Any development proposal which comes forward must demonstrate that the development does not compromise the ability to deliver the infrastructure required by this allocation and identified in this policy and the Infrastructure Delivery Strategy and does not prejudice the future integration of future development at the new community beyond this plan period.

In appropriate cases the Council, another government or public sector body or relevant landowners/developers may forward-fund and bring forward delivery of a specific item or items of infrastructure that is required for this allocation in the Infrastructure Delivery Plan and compulsory purchase powers may be used in order to deliver such items of infrastructure if required. Development proposals within the new community allocation (or benefitting from the infrastructure provided as part of the new community allocation) will be expected to contribute towards the infrastructure required by this allocation on a pooled and, where applicable, on a retrospective basis (i.e. a contribution will still be required, even where the infrastructure has already been built and/or fully or partially funded, including through forward-funding to ensure a fair and consistent apportionment of infrastructure costs across the new community). Such contributions may be sought on a framework section 106 basis to

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ensure that they are fairly and consistently apportioned between the development sites for the new community and may be applied by the Council to reimburse or offset such funding or provision by the Council, other government or public sector body or any relevant landowner/developer. As the final costs of the relevant infrastructure may not be known at the time, planning obligations requiring a contribution towards that infrastructure may also, where appropriate, contain a mechanism for review once the infrastructure has been fully paid for and constructed so as to secure payment of the appropriate final level of contributions to cover the costs of the infrastructure.

Stewardship

Establish a robust and sustainable new town-wide stewardship vehicle and governance early on in the planning and delivery process.

A Stewardship Strategy will be a key component and will form part of the allocation-wide Masterplan providing full details of a) the governance structure and methods of funding of the proposed stewardship vehicle, b) public spaces and community assets to be owned, managed and maintained by the proposed stewardship vehicle and c) an indicative programme for the establishment and operation of the proposed stewardship vehicle.

Meanwhile uses

Whilst waiting for land parcels to come forward for development, and in empty spaces created, appropriate 'meanwhile uses' will be actively encouraged. These 'meanwhile' uses are not expected to be permanent but they will allow social, cultural, business or environmental activity and enterprise to occur on spaces that could otherwise lie vacant or underused.

Waste transfer station

The development is to include a new waste transfer station that is to be completed and capable of operation.

Waste Water Treatment Works

The development is to include a new waste water treatment works to ensure sufficient capacity is available to support the development programme. The foul drainage strategy will include making the foul drainage system (sewerage) non rainfall responsive.

This policy does not apply in the Cranbrook Plan area.

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Justification for policy

4.7. The local plan provides for a second new community near Exeter. The scale of development will ensure a wide range of services and facilities, supported by substantial infrastructure provision. Key facilities, including a secondary school, will be planned and built to serve the new community and surrounding areas.

4.8. The new community will take time to develop, with new homes expected around 2030. With build-out rates of 300+ homes per year we would anticipate around 3,300 homes to be constructed by 2042 and so significant development will extend beyond the local plan's 2042 end date, continuing into the mid-21st century. Public spaces and community assets at the new community need to remain in public ownership and the stewardship vehicle for these assets will need to be self-funding.

The Enterprise Zone

4.9. Enterprise zones are designated areas where employment and business growth are actively encouraged, offering a simpler planning regime and incentives to investors. Enterprise zones in the West End of East Devon, including the Science Park, Skypark, and Exeter Logistics Park, have driven significant growth in high-value jobs. Supported by the Enterprise Zone designation, this area, alongside Exeter Airport, focuses on employment concentration, clean growth, and economic benefits for the wider district.

4.10. Clean growth, defined by the government as increasing national income while reducing greenhouse gas emissions[18], is central to the UK's industrial strategy. East Devon aims to achieve this through low and zero carbon development, district heating networks, and leveraging expertise at Exeter Science Park.

4.11. The Exeter and East Devon Enterprise Zone covers four areas, including a designated area within Cranbrook. The Council will continue to support employment-generating development within these sites, ensuring policy coverage is maintained.

4.12. One of the designated areas falls within Cranbrook. Cranbrook benefits from its own adopted plan which provides detailed policy coverage of the new community including the town centre which is also covered by a masterplan. Some policies in the

[18] ECN-011 – The Clean Growth Strategy, https://eastdevon.gov.uk/media/2qncdlpf/ecn-011-clean-growth-strategy-correction-april-2018.pdf

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Cranbrook Plan also apply to some parts or all of the area shown by the Cranbrook Plan.

Strategic Policy WS02: Development within the Enterprise Zone

Within the designated Enterprise Zone as shown on the Policies Plan support will be given for inward investment and development for business and allied uses.

All new development will need to be complementary to the existing use and purposes of the Enterprise Zone area and its specific vision for development.

New buildings will need to connect to district heating network at Sky Park and Monkerton in Exeter.

In the designated Enterprise Zone a range of building types and sizes, to maintain a flexible and competitive offer will be allowed for. However, large-scale warehousing and distribution development within the Enterprise Zone will only be allowed:

A. As a limited part of a mixed-use scheme; and

B. Providing it will not compromise the ability of those sites to deliver significant high value employment

This policy, is applicable to Cranbrook Town Centre, which is in the Enterprise Zone, and does apply in the Cranbrook Plan area.

Justification for policy

4.13. The Enterprise Zone designation has been successful, and the aim is to build on this success. The focus will continue on developing Local Development Orders (LDOs) to support economic growth. An LDO grants planning permission for specific development proposals or classes of development in defined locations, streamlining the planning process and encouraging investment. LDOs provide clarity and certainty for development, sitting alongside local plan policy to detail appropriate development for the sites. They enable fast-track development to support businesses and job creation.

4.14. Current LDOs include:

- District Heating
- Power Park, Exeter

4.15. The Council is developing an LDO for Sky Park.

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Exeter Science Park

4.16. Exeter Science Park, located northeast of Junction 29 of the M5 motorway, is connected with Exeter University, leveraging its academic excellence. The park supports and encourages companies in science, technology, engineering, mathematics, and medical fields to thrive. Since the early 2010s, Exeter Science Park has grown rapidly, attracting high-quality businesses and significant new investment.

Strategic Policy WS03: Exeter Science Park

At the Exeter Science Park, as shown on the Policies Map, the following uses will be acceptable:

A. Research and development of products or services;

B. Active collaborations with universities, higher education, institutes, research or similar organisations;

C. Technology based services.

Uses which support the above primary activities and supporting green and grey infrastructure will also be accommodated.

New business developments will need to be of the highest quality built in a campus style setting, to reflect the existing Science Park development, with a particular emphasis on provision of high environmental quality and standards.

Other than for supporting infrastructure planning permission will not be granted for built development that comprises of non-business or for businesses that do not accord or align with Science Park objectives.

This policy does not apply in the Cranbrook Plan area.

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Justification for plan policy

4.17. To meet future needs, the current development approach for the Science Park will continue. The existing 'gateway policy' (a legal agreement related to the original planning permission) will be maintained to ensure developments contribute to transformational economic impacts. This gateway policy addresses the types of business uses allowed at the Science Park and their operations.

Development of land north of Exeter Science Park

4.18. Land north of Exeter Science Park offers potential for high-quality mixed-use development, including housing and small business units.

Strategic Policy WS04: Land north of the Science Park (Brcl_23)

An area of around 4.3 hectares north of the Science Park, as shown on the Policies Map, is allocated for:

A. A mix of housing (90 dwellings on 2.3ha);

B. Small business units (2ha) in E(g)(iii) use; and

C. Supporting green and grey infrastructure.

A comprehensive scheme for new development will need to be of the highest quality with a particular emphasis on provision of high environmental quality and standards.

This policy does not apply in the Cranbrook Plan area

Justification for plan policy

4.19. To continue employment growth in the West End of East Devon, additional land is allocated for job-generating uses. This site, north of the existing Science Park and east of the M5 Motorway, may experience noise impacts, affecting suitability for some non-employment uses. Therefore, 2ha to the west of the site is allocated for small, high-quality business units to meet local demand, with the remaining 2.3ha allocated for housing.

Exeter Airport and development in the environs

4.20. Exeter Airport is strategically important for travel and communications, serving as a key asset for East Devon and surrounding areas. Plan policy supports the airport's future operation and growth, promoting it as a gateway to the region and a hub for high-skilled, high-value job creation in aviation and other sectors.

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Strategic Policy WS05: Exeter Airport and its future operation and development

Growth and expansion of the airport and airport related businesses and operations will be supported within its current operational boundaries. The role of the Airport as a test bed for new technologies will be supported through promoting the development of a sustainable aviation cluster.

Within airport operational boundaries:

A. Land to the north of the runway will be allowed to support aviation related development including research and development activity alongside maintenance/repair/overhaul and new freight/cargo operations;

B. Land to the south will be allowed to accommodate further aviation related, employment and training/education uses. This can include occupiers who rely on proximity to an Airport or who benefit from a transferrable skill base as well as to support the developing logistics cluster.

Any new developments must not, however, prejudice or adversely impact on the core operational role and functions of the airport as a travel facility handling the air bound movements of passengers and freight.

Beyond airport operational boundaries noise sensitive development within the 57db noise contour around the airport will be restricted (in order to ensure future airport operations are not adversely impacted) alongside ensuring that any development proposals do not have a material impact on the operation of navigational and safety systems.

The transition to net zero carbon operations at the airport will be supported through enhanced public transport surface access and the installation of renewable energy generating capacity.

This policy does not apply in the Cranbrook Plan area.

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Justification for plan policy

4.21. Exeter Airport is a key gateway to the region, supporting market access, tourism, and serving as a base for the Devon Air Ambulance, National Police Air Service helicopters, and the Royal Mail flight. Exeter Aerospace provides maintenance, repair, and overhaul operations, while the Future Skills Centre offers training for high-tech jobs.

4.22. The Local Plan aims to safeguard current operations and support future growth, particularly towards sustainability. Exeter Airport has the potential to be a testbed for new aviation technologies and propulsion modes, contributing to a sustainable aviation cluster. This aligns with the global challenge to decarbonise aviation, supported by initiatives like the Future Flight programme.

4.23. Opportunities exist for further development north and south of the runway. The north can support research and development and new cargo markets, while the south can accommodate commercial development and expand education and training facilities.

4.24. It is essential that new development does not compromise the airport's safe operation, considering noise sensitivity and the safeguarding of navigational and safety systems.

Employment land east of the airport buildings

4.25. Power Park, a 7.7ha site, benefits from a Local Development Order allowing up to 26,000 sqm of employment space. Land is allocated for various employment uses south and east of Power Park and the airport terminal buildings, as shown on the Policies Map. This site is ideal for high-technology airport-related uses and clean green technology, which should be integral to the masterplan.

Strategic Policy WS06: Employment land east of airport

An area of 24.34 hectares of land east of existing airport buildings and lying either side of Long Lane, is allocated for employment uses (GH/ED/43 and GH/ED/45 and Rock_09a).

The site will form a mixed-use business park and the following uses will be considered appropriate:

A. B2 (general industrial);

B. B8 (storage and distribution);

C. E(g) (Uses which can be carried out in a residential area without detriment to its amenity:

1. Offices to carry out any operational or administrative functions,
2. Research and development of products or processes;
3. Industrial processes;

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D. A limited element of ancillary uses such as indoor sports, recreational or café will be permitted but only where strictly supporting and subordinate to the development of the above employment uses;

E. With its proximity to Exeter Airport the site is well positioned to assist the role of the airport. Uses which relate to the aviation sector and its wider supply chain will be particularly supported alongside other high value employment uses that facilitate economic growth within the area.

This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. The masterplan must include measures to provide fully for infrastructure requirements and appropriate mechanisms for apportionment of development costs and contributions across separately owned land parcels. Planning permission will not be granted for any individual parcel of land in the allocation in the absence of this Masterplan.

The masterplan will need to demonstrate that the following will also be achieved/undertaken:

A. Traffic mitigation to avoid additional traffic negatively impacting on the operation of the local highway network in particular the Long Lane B3184 Intersection;

B. Safe cycle and pedestrian access to nearby facilities and enhancement of public transport accessibility;

C. Protection of the County Wildlife Site;

D. Archaeological assessment to ensure that any impact on the historic WWII airfield is minimised and mitigated;

E. Heritage impact assessment and mitigation taking account of nearby heritage assets (including Grade I listed Rockbeare Manor and its associated Grade II Registered Historic Park and Garden) with careful consideration of setting, building height, design, and landscaping;

F. A comprehensive site-specific Flood Risk Assessment is to be undertaken to assess the risk of surface water and groundwater flooding in relation to the proposed development, and the access and egress arrangements and development should be placed outside of the areas at risk from surface water flooding;

G. Infiltration rates are to be assessed on site as part of a drainage strategy and there is to be early engagement with the Lead Local Flood Authority and the Environment Agency on the proposed sustainable drainage system measures and infiltration rate.

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This policy does not apply in the Cranbrook Plan area.

Justification for plan policy

4.26. The proposed allocation provides strategic-scale employment opportunities next to Power Park and the airport buildings. Uses supporting airport-related and aeronautical business activities will be central to the required masterplan, promoting high-skilled, high-quality green job growth. The site's proximity to the airport and other development sites enhances its attractiveness for businesses and educational establishments.

4.27. Sustainability improvements, including Long Lane enhancements and the Silverdown Link bus loop/cycleway, are enabling increased employment density and improved public transport viability.

4.28. The site is within a Nitrate Vulnerable Zone and Impact Risk Zones for the Exe Estuary SPA and East Devon Pebblebed Heaths SPA and SAC, requiring careful management of water discharge and air pollution impacts.

Employment land north of the airport, adjoining Treasbeare

4.29. Land is allocated for employment uses to the north of the Airport, as shown on the Policies Map. The site is particularly suited to light and general industrial development.

Strategic Policy WS07: Employment land north of the airport, adjoining Treasbeare

An area of 15.3 hectares of land, as shown on the Policies Map to the north of the airport, is allocated for employment uses (Clho_09). The following uses will be considered appropriate;

A. The majority (or all) to be B2 (General industrial);

B. With the remainder (if any) B8 and E(g).

The development will need to come forward in accordance with an approved phasing plan and promote active travel measures and other than for supporting infrastructure planning permission will not be granted for built development that comprises of non-business uses.

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Development proposals for the site must be accompanied by measures to provide fully for its infrastructure requirements and a new access onto London Road capable of safely accommodating the level of traffic likely to be generated when the site is at capacity.

This allocation will need to be supported by further flood risk assessment and measures to ensure that safe cycle and pedestrian access to nearby facilities can be achieved.

Archaeological assessment will be required prior to development commencing to ensure that any impact on the historic WWII airfield is minimised and mitigated.

This policy does not apply in the Cranbrook Plan area.

Justification for plan policy

4.30. Land north of Exeter Airport, south of the old A30, is allocated primarily for general industrial use due to its location near the airport runway and associated noise impacts. Storage and distribution will be permitted as subordinate elements of the scheme provided new access arrangements and the local highway network can safely accommodate the traffic. Development proposals must be based on further environmental, heritage, and traffic assessments, with appropriate mitigation if required.

4.31. The site is within an Impact Risk Zone for the Exe Estuary SPA, which may be triggered by water or liquid waste discharge of more than 20m^3/day. The Impact Risk Zone for the East Devon Pebblebed Heaths SPA and SAC may be triggered by industrial development causing air pollution.

Employment land at Wares Farm, opposite the airport buildings, south of the A30

4.32. A small piece of land is allocated for employment uses on the southern side of the A30, opposite the airport buildings. The site is shown on the Policies Map and is suitable for small business or start-up units.

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Strategic Policy WS08: Employment land opposite airport buildings, south of A30

An area of 1 hectare of land, as shown on the Policies Map, is allocated for small business units (Farr_01)The following uses will be considered appropriate;

A. B2;

B. E(g).

Archaeological assessment will be required prior to development.

Site-specific Flood Risk Assessment is required and development should be placed outside of the areas at risk from flooding.

This site will require private sewage/drainage measures and infiltration rates must be assessed on site as part of a drainage strategy.

This policy does not apply in the Cranbrook Plan area.

Justification for plan policy

4.33. Land south of the A30 is allocated for small business or start-up units to offer flexibility and meet the need for smaller, less expensive premises not otherwise available in this area. Occupiers may provide supporting services to nearby residents and businesses at the airport.

4.34. The site is within a Nitrate Vulnerable Zone and Impact Risk Zone for the Exe Estuary SPA, which may be triggered by water or liquid waste discharge of more than 20m^3/day to ground or surface water. Additionally, the Impact Risk Zone for the East Devon Pebblebed Heaths SPA and SAC may be triggered by industrial development causing air pollution.

The ongoing development and potential for expansion of Cranbrook

4.35. Cranbrook is a new community under construction on the western side of East Devon, about 5 km from the M5 Motorway and Exeter City boundary. Since starting from a green field in 2011, it has grown to around 3,000 homes by the end of 2021. The Cranbrook Plan includes policies to expand the town to nearly 8,000 homes.

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4.36. Cranbrook will continue to develop under the adopted Cranbrook Plan, with selected policies from this local plan also applicable. The Cranbrook Plan has an end date of 2031, and a new plan will supersede it before then. All infrastructure requirements to support ongoing development in Cranbrook are set out in the Cranbrook Plan.

Clyst Valley Regional Park, Green infrastructure and a high-quality environment for the West End

4.37. Green Infrastructure (GI) is a network of multifunctional green spaces and natural areas, including footpaths, cycleways, and other routes that link these spaces. GI delivers a wide range of environmental, economic, health, and wellbeing benefits. Significant emphasis has been placed on GI provision and enhancement in the western side of East Devon, particularly through the Clyst Valley Regional Park, which this plan provides the expansion for.

Strategic Policy WS09: Clyst Valley Regional Park

Land is allocated, as shown on the Policies Map, for the Clyst Valley Regional Park (CVRP). Development proposals within and adjacent to the CVRP will integrate Green Infrastructure and support the achievement of the objectives in the CVRP Management Plan. Any schemes that do not contribute to these objectives, or which would frustrate their implementation, will be refused planning permission.

All major development proposals within or on land adjacent to the Clyst Valley Regional Park will need, directly or through mitigation, to:

A. Meet local plan policy requirements for Green and Blue Infrastructure;

B. Provide connected cycling/walking infrastructure, where possible, including extension of or links to the Clyst Valley Trail;

C. Restore and enhance the landscape character and sense of place of the Clyst Valley;

D. Reduce recreation pressure on environmentally sensitive locations, through the creation of accessible green space and where appropriate Suitable Alternative Natural Greenspace (SANG);

E. Contribute to the achievement of excellent ecological status in the River Clyst and tributaries, through enhanced natural flood storage, capture of run-off and restoration of soil health;

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F. Contribute to or make proportionate contributions to the following CVRP targets:

1. Creation and/or restoration of 1,000 hectares of priority natural habitat within the Nature Recovery Network;
2. 30% tree canopy cover in accordance with the East Devon Tree, Woodland and Hedges Strategy;
3. 740 hectares of Public Open Space meeting 'Building with Nature' or 'Green Flag Award' standards;
4. 80 km of traffic-free trail and quiet way meeting LTN 1/20 design standards – see Cycle infrastructure design (LTN 1/20) - GOV.UK (www.gov.uk).

Where major development occurs outside of but close to the allocated park, we would wish to see all the above policy tests addressed and also green space provision associated with or required for the development should, where possible, be linked to and provide pedestrian and cycle access into the CVRP.

This policy applies in all of the Cranbrook Plan area.

Justification for policy

4.38. The Clyst Valley Regional Park is a strategic asset on the western side of East Devon, forming a setting for new developments. It was first defined alongside earlier strategic development schemes.

4.39. A 25-year masterplan for the Regional Park[19], approved by EDDC in February 2021, won the 2021 RTPI South West Award for Planning Excellence and was a finalist in the national RTPI awards 2022.

4.40. The park concept links greenspaces with predominantly traffic-free trails and good public transport. Most of the park is privately owned, with 762 hectares currently accessible and an ambition to increase this by 740 hectares over 25 years. A large portion of the park is within the National Trust's Killerton estate and 40% is within a floodplain.

[19] ENV-001 – Clyst Valley Regional Park 25 Year Masterplan, https://eastdevon.gov.uk/media/2pwh3s1e/env-002-cvrp-masterplan-final.pdf

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4.41. The park helps contribute to European protected wildlife sites meeting conservation objectives.

4.42. The Clyst Canopy project aims to increase tree cover from 10% to 30% over 50 years through retaining mature trees, natural regeneration, and planting various tree forms. Urban tree cover is also vital.

4.43. Delivering park objectives relies on partnerships across public, private, and charitable sectors, with funding from diverse sources, including Community Infrastructure Levy and Section 106 obligations. EDDC has secured funding from the National Lottery Heritage Fund with match funding from partners.

Development north of Topsham and east of the M5 Motorway

4.44. Talking advantage of proximity to Exeter and links with Topsham, land is allocated for an urban extension north of Topsham.

Strategic Policy WS10: Development next to the M5 and north of Topsham

Land shown on the Policies Map is allocated in East Devon for an urban extension to the north of Topsham to accommodate mixed use development including:

A. Around 596 new homes;

B. 2.4 hectares of employment land;

C. 1.8 hectares of land safeguarded for education purposes to provide the option for primary education infrastructure on site. Additional early years, primary, and secondary education infrastructure is required to support this development. Additional provision for pupils with special education needs and provision for home to school transport is also required.; and

D. Supporting infrastructure, green spaces and links to the Clyst Valley Regional Park.

The development will need to be supported by a new developer provided SANGs, brought forward and implemented as part of the overall scheme on the allocated or on nearby land.

This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented, including with appropriate mechanisms for

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apportionment of development costs and contributions across separately owned land parcels. Full agreement will be required before any specific parcels of land can come forward for development.

This Masterplan will also need to be developed in conjunction with joint work between Exeter City Council and East Devon District Council on a formal **Development and Infrastructure Delivery Framework** which is required to ensure development and infrastructure needs on the edge of Topsham, in the Exeter City Council area, and the adjacent allocation North of Topsham, in East Devon, progress in a coordinated cross-boundary manner.

The delivery framework will include:

A. The timely delivery and funding of a range of infrastructure and facilities including primary healthcare, indoor space for community use, sport and recreation and green infrastructure to meet the needs from development in Exeter and East Devon;

B. A comprehensive transport strategy to prioritise active travel and public transport; and

C. The need to respect Exeter's landscape setting area and the Clyst Valley Regional Park.

The Delivery Framework will be produced jointly by East Devon District Council and the City Council working with partners including landowners, developers, Devon County Council, the Environment Agency, Natural England, the NHS, community groups and Clyst St George Parish Council.

Through a transport assessment the traffic impacts of development of the site will need to be assessed in conjunction with the cumulative impacts that will also arise from development of the new community, and other new developments. Mitigation measures will need to be designed and agreed, to come forward in parallel with or prior to development to address adverse impacts, specifically including in respect of the M5 J30 (Sandygate Roundabout) and Clyst St Mary Roundabout.

Planning permission will not be granted for any individual parcel of land in the allocation in the absence of a comprehensive development scheme with clear mechanisms outlined for full policy requirements to be met and delivered.

4.45. This policy does not apply in the Cranbrook Plan area.Land near Exeter, south of Junction 30 and to the east of the M5, offers an opportunity for new mixed-use development, accommodating around 596 new homes. Development in East Devon

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should be planned in the context of East Devon standards as well as city development, with a masterplan addressing development in East Devon and joint work on an Infrastructure Delivery Plan across the city boundary.

Gypsy and traveller site east of the M5

4.46. Land east of the M5 and south of the Exeter-Waterloo line has been identified for a gypsy and traveller site due to an unmet need, particularly in the West End of East Devon.

Strategic Policy WS11: Gypsy and traveller site east of M5

Land shown on the Policies Map that lies to the east of the M5 and south of the Exeter-Waterloo line is allocated for a gypsy and traveller site to provide at least 5 permanent pitches.

Planning permission will be granted for development of a gypsy and/or traveller site to address need for provision specifically on the western side of East Devon District. The allocated site benefits from good highway access roads to the south though any proposal will need to be carefully designed to avoid adverse impacts on surrounding uses and the high quality of commercial and residential development in this part of East Devon. A pedestrian link, free for all to use, should be provided as part of any scheme at this site between the existing country park to its east and its Langaton Lane to its west.

An area of floodplain covers part of the site and as such built development will need to be within central and northerly parts of the site and further flood risk assessment will be required to demonstrate acceptability of proposals. Development for non gypsy and traveller uses and occupation, other than for supporting infrastructure, facilities and landscaping will not be allowed.

This policy does not apply in the Cranbrook Plan area.

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Justification for plan policy

4.47. The latest needs study highlights[20] a shortage of gypsy and traveller accommodation in East Devon, with a particular need in the West End due to historic travelling patterns. The site offers good highway access and pedestrian access to services and facilities. It previously housed a piggery, and existing farm buildings may be converted for ancillary use.

Employment land at Sandygate, between the M5 and Clyst Road

4.48. A small piece of land on the eastern side of Clyst Road is allocated for employment uses, suitable for small business or start-up units.

Strategic Policy WS12: Employment land at Sandygate, between M5 and Clyst Road

An area of 0.7 hectares of land, as shown on the Policies Map, is allocated for small business units (Clge_07) for light or general industrial use only, recognising that there is a local need for such provision. The following uses will be considered appropriate;

A. B2;

B. E(g).

This allocation will need to be accessed through the adjoining employment site unless it can be demonstrated that a safe access directly onto Clyst Road can be achieved. Development may also need to contribute towards localised mitigation of any traffic concerns on the highway network.

Archaeological assessment will be required prior to development commencing and building height and design considerations will be critical in order to ensure that development does not impact on the setting of Clyst St Mary Bridge, which is a Scheduled Monument.

This policy does not apply in the Cranbrook Plan area.

[20] HOU-009 – East Devon Gypsy and Traveller Accommodation Assessment, https://eastdevon.gov.uk/media/gl0n5qkq/2024-09-30-east-devon-gtaa.pdf

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Justification for plan policy

4.49. This site is allocated for small business or start-up units to meet the need for smaller, less expensive light or general industrial premises not otherwise available in this area. Development proposals must consider environmental, heritage, and traffic assessments, with appropriate mitigation if required. Contributions may be sought for active travel plan improvements as outlined in the emerging Clyst Road Access Strategy. The Impact Risk Zone for the Exe Estuary SPA may be triggered by air pollution or water discharge exceeding 20m^3/day.

Employment land at Lodge Trading Estate, Station Road, Broadclyst

4.50. Land to the east of the existing employment area at Lodge Trading Estate, Broadclyst, is allocated for small or medium businesses, but not for those generating significant HGV movements due to local highway constraints.

Strategic Policy WS13: Employment land at Lodge Trading Estate, Broadclyst

An area of 1.89 hectares of land, as shown on the Policies Map, is allocated for employment use (Brcl_27a). The following uses will be considered appropriate;

A. B2;

B. E(g).

Due to the special characteristics of the site, further assessment work will be required to inform any planning application. This should include:

A. Detailed flood risk assessment;

B. Archaeological assessment; and

C. Onsite verification of the extent of the Coastal and Floodplain grazing marsh priority habitat and a design and layout which avoids this area.

The access arrangements will require assessment to ensure that Station Road is suitable to accommodate additional traffic and any non-motorised user requirements. The developer may be required to contribute towards localised mitigation on the highway network.

This policy does not apply in the Cranbrook Plan area.

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Justification for plan policy

4.51. This site extends an existing business park, limited to areas outside the floodplain and not in active employment use. Development must consider environmental and heritage factors, and future highway improvements for non-motorised users. Proximity to the railway requires improvements to fencing and maintenance access. The Impact Risk Zone for the Exe Estuary SPA may be triggered by water discharge exceeding 20m^3/day.

Employment land south of Langdon's Business Park, Clyst St Mary

4.52. Land to the south of Langdon's Business Park, Clyst St Mary, is allocated for employment uses, suitable for small or medium businesses, with a focus on supporting the expansion of existing businesses.

Strategic Policy WS14: Employment land south of Langdon's Business Park, Clyst St Mary

An area of 1 hectare of land, as shown on the Policies Map, is allocated for new business units (Sowt_15a). The following uses will be considered appropriate;

A. B2;

B. B8;

C. E(g).

Archaeological assessment will be required prior to development commencing. Due to the proximity of a number of Grade II listed buildings a high quality sensitively planned development scheme will be required at this site with particular attention given to of building heights, design, materials and landscaping along with associated mitigation measures.

The current access arrangements will require reassessment to ensure they are suitable to accommodate additional traffic. The developer may be required to contribute towards localised mitigation on the highway network.

This policy does not apply in the Cranbrook Plan area.

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Justification for plan policy

4.53. This site is allocated for business units, particularly to support the expansion of existing businesses on the Business Park. Development must consider environmental, heritage, and traffic factors, with detailed assessments and appropriate mitigation as required. The Impact Risk Zone for the Exe Estuary SPA may be triggered by industrial development causing air pollution or water discharge exceeding 5m^3/day

Employment land at Darts Farm, Topsham Road, Clyst St George

4.54. Darts Farm, a popular shopping centre, has an adjacent parcel of land allocated for employment use. This site offers an opportunity to produce and showcase locally grown food and drink.

Strategic Policy WS15: Employment land at Darts Farm

An area of 2.13 hectares of land, as shown on the Policies Map, is allocated for small business units in Use Class E(g) for the manufacture or processing of locally grown food and drink products (Clge_23a and Clge_25a).

Road access for this allocation will most likely need to be through the main Darts Farm access, with the likelihood of highway improvements being needed,and development proposals will be required to demonstrate that this can be achieved safely and without detriment to the existing commercial activities and car parking provision on the wider site. The developer may also be required to contribute towards localised mitigation on the highway network.

Archaeological assessment will be required prior to development commencing.

A site-specific FRA will be required to assess the risk of surface water and groundwater flooding in relation to the proposed development, and development should be placed outside of the areas at risk from surface water flooding. Infiltration rates will need to assessed on site as part of a drainage strategy. Noting that the site is located within a Nitrate Vulnerable Zone, Impact Risk Zone for the Exe Estuary SPA may be triggered if there is any discharge of water or liquid waste that is discharged to ground or to surface water. If the development will affect trees or hedges along the north of the site, then further assessment of impact on the Exe Estuary SPA will be required.

This policy does not apply in the Cranbrook Plan area.

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Justification for plan policy

4.55. This site is allocated for small business units to complement the adjoining retail use, add value to locally produced goods, and meet an identified need in the District. Preference is given to the manufacture and processing of local food and drink products.

4.56. Development proposals must be based on further environmental, heritage, and traffic assessments, with appropriate mitigation undertaken if required.

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Development in the Towns and Villages



Chapter 5. Development in the Towns and Villages

5.1. This chapter outlines land allocations for development in Exmouth, Main Centres, Local Centres, and Service Villages in East Devon, based on the settlement hierarchy set out in the plan. It should be noted that none of the policies in this chapter apply in the Cranbrook Plan area and specific refence is not made, in this chapter, to non-applicability.

5.2. Policies specify expected development levels on each site, expressed as approximate numbers/area figures. Higher or lower levels may be possible depending on site-specific constraints or opportunities. Policies address challenges, concerns, or opportunities for high-quality development on specific allocation sites but the plan should be read as a whole to apply all relevant policies.

The principal centre of Exmouth

5.3. Exmouth is established as the only Tier 1 settlement, and is suitable for higher levels of growth and development. The plan allocates land for housing and employment in Exmouth, proportionate to its size, function, and future role, as shown on the policies map.

Strategic Policy SD01: Exmouth and its development allocations

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

Land to the South of Courtlands Lane (Exmo_23)

This land, south of Courtlands Lane, will form a small-scale development on the northern side of Exmouth to accommodate around 12 new homes. The scheme will need to demonstrate how safe pedestrian access, avoiding on-road walking, will be achieved to surrounding and neighbouring areas.

Land at Courtlands Cross (Lymp_07)

This site at Courtlands Cross will accommodate around 100 new homes and 0.4 hectares of employment land. The field to the west of the housing allocated land is allocated for delivery of sports pitch uses and associated low key ancillary facilities as

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part of a viable package of planning obligations. Built development at this site, located on the two south-easterly fields, will need to be particularly sensitively designed to avoid potential for adverse impact on nearby heritage assets and to avoid adverse landscape impacts. Particular importance is attached to retention of the East Devon Way footpath, in a spacious corridor, across the site in a north-south direction. There should also be safe off-street pedestrian and cycle access that provides for east-west movement through the area for existing and future users linking into adjacent areas such as Lympstone Manor and allocated site Exmo_23. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Land west of Hulham Road (Exmo_47)

This land west of Hulham Road, south of Point-in-view, is allocated for around 15 new homes. The sensitive historic setting of this site, with a Registered Park or Garden to the northern and western site boundaries is such that any scheme will need to be sensitively designed to avoid adverse impacts. Built development should be accommodated in the southerly parts of the site only.

Land at Coles Field Hulham Road (Lymp_14)

This site is allocated for around 59 new homes. Biodiversity interest at and close to this site will demand particular sensitivity in respect of site design and implementation to avoid damages. This site will need to provide pedestrian and cycle access into the adjoining site Exmo_04a.

Land at Marley Drive (Exmo_04a)

This site is allocated for around 50 new homes. The site supports a number of significant mature trees with areas of biodiversity value within the site and to its boundaries which will demand particular sensitivity in respect of site design and implementation to avoid damages. There will need to be pedestrian and cycle access through this site into Site Lymp_14 and thereafter on into Goodmores Farm.

Land at St John's (Exmo_20)

Land at St John's, on the eastern side of Exmouth, is allocated for a comprehensive development scheme to accommodate:

A. Social and community facilities;

B. Around 700 new homes; and

C. At least 2 hectares of employment land.

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This site allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how phased comprehensive development will be undertaken and implemented, including with appropriate mechanisms for apportionment of development costs and contributions across separately owned land parcels. Full agreement will be required before any specific parcels of land can come forward for development.

Built development will need to be concentrated in the southern parts of the site and the scheme will need to place considerable emphasis on protection of the setting and tranquillity of nearby heritage assets, specifically St John in the Wilderness church. Support will be given for expansion of the churchyard, to provide more burial/interment of ashes space at St John in the Wilderness. Parts of the site and adjoining areas, especially woodlands are of biodiversity importance and sensitivity and great care will be needed in developing proposals to ensure their protection and enhancement. New homes and other development that would result in unacceptable impacts will not be permitted within 400 meters of the Pebblebed Heaths. The development will need to be supported by a new developer provided SANGs, brought forward and implemented as part of the overall scheme on the allocated or on nearby land.

Vehicular access, to accommodate modest levels of development, will be allowed for southern site parts from the road 'Southern Wood', subject to detailed assessment of highway access acceptability and objective review of local road and junction capacity and with mitigation provided to address unacceptable adverse impacts. Primary vehicle access to the site, serving the large majority/large bulk of development, will be from the B3179 to the north. High quality, safe and attractive to use pedestrian, cycle and public transport access, particularly providing southerly site links into Exmouth and to nearby services, facilities and job opportunities, will need to be an essential part of the overall development scheme.

Land directly to the East of Liverton Business Park (Exmo_18)

This land east of Liverton Business Park is allocated for employment uses and will form an extension to the existing business park and extends to around 2.7 hectares in size.

Land to the South of Littleham (Exmo_17)

This land on the north eastern side of Exmouth is allocated for a mixed-use development to provide:

A. Around 410 new homes;

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B. 1.6 hectares of employment; and

C. supporting community uses.

This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. The site is located in the East Devon National Landscape and particular sensitivity will need to be taken in respect of design and development approaches to minimise potential for adverse landscape impacts. Southerly parts of the site are particularly sensitive and considerable care will be needed in protecting the setting and ambience of St Margaret and St Andrews Church at Littleham.

The development will need to be supported by a new developer provided SANGs, bought forward and implemented as part of the overall scheme on the allocated or on nearby land. The cycle path bisecting the site will need to be retained and enhanced within an attractive corridor with pedestrian and cycle access routes provided throughout the development.

Vehicular access will be from Salterton Road and will need to take a harmonised approach with the industrial estate to the north of the road, potentially with a shared intersection. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Littleham Fields (Exmo_08 and Exmo_16 combined)

This land close to Littleham will form a small-scale residential extension on the southern side of Exmouth to accommodate around 45 new homes. Parts of the site are steeply sloping and great care will be needed in design and through landscaping to minimise landscape impacts. There is also the listed Green Farm to the west of the site the setting of which will need to be carefully address. Vehicular access via Elm Lane would be less desirable, with Parlour Meadow more suitable.

Land at Douglas Gardens (Exmo_06)

This land at Douglas Gardens will form a small-scale residential extension on the southern side of Exmouth to accommodate around 44 new homes.

Exmouth town centre Police Station (Exmo_50)

This site forms an urban redevelopment opportunity that will accommodate a new police station as well as at least 20 new homes, though with skilful design, noting the significance heritage interests around the site, a greater number of new homes will be

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actively encouraged. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan.

Axminster

5.4. The Local Plan strategy establishes Axminster as a Tier 2, Main Centre, settlement and as such as an appropriate location for future growth and development.

Strategic Policy SD02: Axminster and its development allocations

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

Land east of Lyme Road (Axmi_22)

This site is allocated for 100 dwellings. The site layout should make provision for a suitable access road to facilitate the development of site GH/ED/80 to the north and also be built to a standard suitable for use as part of a possible future relief road to link to the A358, Chard Road, south of the Weycroft Bridge.

Prestaller Farm, Beavor Lane (Part of GH/ED/80)

This site is allocated for 225 dwellings and a community hub to the south of the Mill Brook. The community space should provide opportunities for a workspace, café/shop and meeting space. To the north of Mill Brook land has the potential for use as a multi-functional public open and natural space as well as for habitat mitigation purposes. Where this is required to meet the needs of the development provision will be required. Vehicular access to the site shall be from the allocated land to the south (Axmi_22) unless otherwise agreed.

Development must incorporate a site road that is of a standard and is appropriately located so that it, and through potential future extension of the road, can form a possible future relief road to link to the A358, Chard Road, south of the Weycroft Bridge. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan.

Sector Lane should be reconfigured and harmonised into future proposals. Public Rights of Way enhancements should also be explored. The development will need to

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maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Land west of Chard Road (GH/ED/83)

This land is allocated for 140 dwellings and 0.8 hectares of employment land. Development proposals should seek to introduce bus stops on Chard Road to promote sustainable travel into Axminster and to railway station. Development should also ensure pedestrian/cycle access onto Axminster Footpath 79.

Land west of Musbury Road (Axmi_01a)

This land is allocated for 2 hectares of employment land. The site contains two World War II pill boxes and development between them and the railway line to the west should be kept as public open space with interpretation boards to explain the significance of their role in the Taunton Stop Line. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan.

Land east of Musbury Road (Axmi_02, Axmi_08 and Axmi_09)

This land is proposed for 438 dwellings and 1.6 hectares of employment land. This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. Through this masterplan particular account will need to be taken of providing active travel links to the town centre and railway station, together with addressing the landscape and heritage sensitivities of the site. Highways access shall be taken from the A358 Musbury Road. The masterplan shall take full account of archaeological survey work to determine the extent of remains associated with the adjacent Scheduled Ancient Monument. Community facilities to include a hall or meeting place will need to be incorporated into and delivered by the development. Connectivity onto Wyke Road and public rights of way will be required to ensure good pedestrian/cycle access. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes. In particular, it should explore opportunities to provide off-carriageway bus stops on Musbury Road to improve sustainable travel options.

Land at Axminster Carpets (Axmi_07)

This land is allocated for mixed-use redevelopment to retain the existing employment use and accommodate 50 dwellings plus additional employment uses. This allocation will need to be supported by further flood risk assessment and a comprehensive

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masterplan to secure pedestrian, environmental and other improvements. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential and exception test has been undertaken as part of the local plan. Development should be appropriately designed to accommodate pedestrian/cycle access and through routes.

Scott Rowe Building, Axminster Hospital, Chard Road (Axmi_10)

This brownfield land redevelopment opportunity land is allocated for 10 dwellings.

Land at Lea Combe, Field End (Axmi_12)

This land is allocated for 9 dwellings. The site will need to be carefully designed to accommodate and protect the trees, which are subject to a Tree Preservation Order, and also to protect the setting of nearby heritage assets.

Land east of Lyme Close (Part of Axmi_11c)

This land is allocated for 50 dwellings and 0.4 hectares of employment land.

The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Land at Millwey, Chard Road, Axminster (Axmi_17)

This land is allocated for 19 dwellings. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan. This site is an existing open space, with a previous use for sports pitches, the loss of which will need to be addressed through the development process. Careful consideration of access arrangements may require the relocation of the southbound bus stop.

Millwey Garages, St Andrews Drive (Axmi_18)

This Brownfield land is allocated for 6 dwellings.

Websters Garage, 9 Lyme Street (Axmi_23)

This land is allocated for 10 dwellings as part of a mixed-use development. Though with well-designed development there is potential scope to accommodate more new homes potentially as well as commercial space or community facilities. Very careful design will be needed to reflect the Conservation Area location and the setting of surrounding heritage assets. Support will be given for incorporation of unused or underused land and buildings adjoining the allocated site to be incorporated into a comprehensive scheme.

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Opportunities for low-car development should be explored, due to the site's proximity to town centre and local services.

Land west of Prestaller Farm, Beavor Lane (Axmi_24)

This land is allocated for 29 dwellings. Development at this location is likely to be dependent on neighbouring developments coming forward. Improvements will be needed to ensure pedestrian/cycle accessibility.

Honiton

5.5. The Local Plan strategy establishes Honiton as a Tier 2 settlement and as such as an appropriate location for future growth and development. Plan policy sets out land allocations for development and these are shown on the policies map along with other policy boundaries that are at the town.

Strategic Policy SD03: Honiton and its development allocations

The sites/areas listed below are identified on the Policies Map and are allocated for development.

Land west of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05)

Land to the west of Hayne Lane, on the western side of Honiton, is allocated for a mixed-use development to provide:

A. 310 homes; and

B. 14.6 hectares of land to accommodate employment and community uses.

This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. Southern parts of the site are in the East Devon National Landscape and this area will require very careful design to take account of its landscape setting. On the western edges the site is close to the historic village of Gittisham and particular sensitivity will need to be attached to preventing adverse heritage impacts. These southerly and westerly parts will be best suited for open space uses.

Commercial and employment uses will need to be concentrated to the north of the railway line bisecting the site with residential uses to the south. Community facilities, to include a shop or shops and a hall, will need to be provided within or next to

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residential parts of the development. There will be the need for attractive and safe pedestrian and cycle linkages between the southern and northern parts of the site (ideally utilising an existing passage under the railway that lies in a roughly mid-way point in the allocation).

It is expected that vehicular access to the residential development will be via the existing estate to the north (i.e. via Meadow Acre Road). Vehicular access to the employment development will need to come via Hayne Lane. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes, including bus services.

Former Millwater School at Bottom Road (Honi_06)

This land is allocated for 30 homes and will form a small-scale development in the southern part of Honiton.

Land adjacent to St Michaels Church and south east of Cuckoo Down Lane (Honi_07 and Honi_12)

This land is allocated for 101 homes and will form a residential extension on the southern side of Honiton. The site is in the Blackdown Hills National Landscape area and close to heritage assets, it will require very careful design to take account of its landscape setting and the setting of surrounding heritage assets. Therefore a high-quality comprehensive development scheme is required for the whole site. Development within allocation Honi_12 is expected to be dependent on development within allocation Honi_07 coming forward, as access needs to be from Weatherill Road. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Land at Ottery Moor Lane (Honi_10)

This land is allocated for 21 homes and will form a small-scale development on the northern side of Honiton.

Land at Middle Hill, Church Hill (Honi_13)

This land is allocated for 10 homes and will form a small-scale residential extension on the southern side of Honiton. This site is in the Blackdown Hills National Landscape and close to heritage assets, it requires very careful design to take account of its landscape setting and the setting of surrounding heritage assets.

Land at Hurlakes, Northcote Hill (Honi_14)

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This land is allocated for 30 homes and will form a small-scale residential extension on the eastern side of Honiton. Development requires safe access (for all road users) and a harmonised masterplan approach with GH/ED/39b.

Land at Kings Road (Honi_18)

This land is allocated for 136 homes and and will form a medium-scale residential extension on the eastern side of Honiton. Development proposals would need to consider a crossing of Kings Road to provide access to bus stops on Waterleat Avenue. The development will also need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Land south of Northcote Hill – north of the railway (GH/ED/39a)

This site is allocated for a total of 100 homes and will form a medium-scale residential extension on the eastern side of Honiton. Vehicular and pedestrian/cycle access improvements would be required. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Land south of Northcote Hill – south of the railway (GH/ED/39b)

This site is allocated for a total of 100 homes and will form a medium-scale residential extension on the eastern side of Honiton. Parts of the site are on more elevated ground and development will need to be sensitively planned to avoid adverse impacts on the nearby Blackdown Hills National Landscape area. Vehicular and pedestrian access improvements would be required, incorporating Northcote Hill into development. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Employment Land within the Existing Heathpark Industrial Estate

Within the existing Heathpark industrial estate Plots 11A, 11B, 11D and 11M extending to 3.3 hectares are allocated for employment development.

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Ottery St Mary

5.6. The Local Plan strategy establishes Ottery St Mary as a Tier 2 settlement and as such as an appropriate location for future growth and development. Plan policy sets out land allocations for development and these are shown on the policies map along with other policy boundaries that are at the town.

Strategic Policy SD04: Ottery St Mary and its development allocations

The sites/areas listed below as identified on the Policies Map are allocated for development.

Barrack Farm (Otry_01b)

This land at Barrack Farm, on the western side of Ottery St Mary, is allocated for around 70 new homes and 1.25 hectare of employment land provision. Archaeological assessment will be required prior to development commencing and will need to inform development proposals. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes. Development at this site should provide a harmonized access and interaction with Land at Thorne Farm (Otry_09).

Land at Thorne Farm (Otry_09)

This land, which lies west of the town and adjacent to the sports centre and school, will provide 90 new homes as well as space for an educational facility. Further flood risk assessment is required and an undeveloped buffer should be maintained to protect the County Wildlife Site and Ancient Woodland to the north west of the site.

Land at Salston Barton (Otry_10)

This land, which lies north and south of Salston Barton, is proposed for 20 houses. Archaeological assessment will be required prior to development commencing. This allocation must be supported by details of special measures to be taken to protect ancient trees and measures to ensure that safe cycle and pedestrian access to nearby facilities and Ottery St Mary town centre can be achieved.

Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes

Land at Bylands, Slade Road (Otry_15)

This garden site on the eastern side of the town at Slade Road is proposed for 8 houses.

Land south of Strawberry Lane (GH/ED/27)

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This land lies south of Strawberry Lane and is proposed for 60 houses. This allocation will need to be supported by further flood risk assessment work, details of special measures to be taken to protect ancient trees and measures to ensure that safe cycle and pedestrian access to nearby facilities and Ottery St Mary town centre can be achieved. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Gerway Farm (Otry_21)

This land at Gerway Farm, off Sidmouth Road, is proposed for 70 houses. Archaeological assessment is required prior to development. Further flood risk assessment and measures to ensure that safe cycle and pedestrian access to nearby facilities can be achieved will be required.

Seaton

5.7. The Local Plan strategy establishes Seaton as a 'Main Centre' (Tier 2 settlement) and as such as an appropriate location for significant development to serve its own needs and that of wider surrounding areas. Plan policy sets out land allocations for development and these are shown on the policies map along with other policy boundaries that are at the town.

Strategic Policy SD05: Seaton and its development allocations

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

Land at Barnards Hill Lane (Seat_02)

This site is allocated for around 40 dwellings. A wide buffer should be provided to the northern boundary with tree planting/landscaping in the northern and western edges to soften the boundary with the countryside and create a well considered and designed northern edge to Seaton. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented. Development would need to provide a safe access onto Polar Tree Drive and also consider impacts on and

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proximity to the Polar Tree Drive/Barnards Hill Lane junction, with mitigation to improve road safety and/or calm traffic potentially required.

Land to the south of Harepath Hill (Seat_03)

This site is allocated for around 75 dwellings. Built development should be concentrated in the less prominent eastern edge near Harepath Road, and/or to the south adjoining existing dwellings up to 55m contour line. Development should also respect the setting of the Grade II listed Harepath Farm. A wide buffer should be provided to the northern and western boundaries with tree planting/landscaping in the northern and western edges to soften the boundary edge with the countryside and create a well considered and designed northern edge to Seaton. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented. Development proposals should explore opportunities to improve bus stop infrastructure on Harepath Road, to promote sustainable travel.

Land off Harepath Road (Seat_05)

This site is allocated for around 130 dwellings and 2.2 hectares of employment land. The employment land should be located in the field immediately north of the existing Harepath Road Industrial Estate. The small areas of adjoining woodland to the north should be enhanced through additional planting. Tree planting/landscaping on the northern edge is required and will help soften boundary edges with the countryside. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented. Development proposals should explore opportunities to improve bus stop infrastructure on Harepath Road, to promote sustainable travel. Proposals should also consider pedestrian/cycle access onto Colyford Road and the Seaton – Colyford multi-use trail.

Seat_03 and Seat_05

Will need to come forward as a co-ordinated and comprehensive development that delivers the proposed large-scale mixed-use development on the northern edge of Seaton and seeks to deliver the long-standing need for a football pitch as part of a viable package of planning obligations.

Land west of Axeview Road (Seat_13a)

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This site is allocated for around 39 dwellings. Archaeological assessment through geophysical survey and field evaluation should be undertaken prior to the site being developed. Development must be sensitively located and designed to ensure that it avoids damage to archaeological remains and conserves the setting of Roman and Earlier Settlement remains at Honeyditches Scheduled Monument. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Sidmouth

5.8. The Local Plan strategy establishes Sidmouth as a Tier 2 settlement and as such as an appropriate location for future growth and development. Plan policy sets out land allocations for development and these are shown on the policies map along with other policy boundaries that are at the town.

Strategic Policy SD06: Sidmouth and its development allocations

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

Land south-west of Woolbrook Road (Sidm_01)

This land is allocated for development of 127 new homes. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented. The development will need to maximise opportunities for localised improvements/ contributions to enhance sustainable travel modes.

Land west of Two Bridges Road, Sidford (Sidm_06)

This land is allocated for development to the north of Sidford to accommodate around 30 new homes. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented. Development will need to play its part in supporting delivery of DCC's Sidbury - Sidmouth cycle route.

Land east of Burscombe Lane / west of Windsor Mead (Sidm_31)

This land is allocated for a small-scale development adjacent to the built edge to the north of Sidford and will accommodate around 15 new homes. In order to ensure no

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adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented. The site is within the East Devon National Landscape and is related to an area of predominantly single storey dwellings. The site will require very careful planning and use of materials to take full account of both the immediate context and views from the wider landscape, particularly when viewed from higher land to the east, and only single storey dwellings will be appropriate. It is expected that access for all road users would be off Windsor Mead.

Local centres

5.9. There are five local centres (Tier 3 settlements) that are explicitly identified as offering scope for development in the local plan, these are:

- Broadclyst;
- Budleigh Salterton;
- Colyton;
- Lympstone; and
- Woodbury.

5.10. Plan policy sets out land allocations for development at the local centres and these are shown on the policies map along with other policy boundaries that are at the local centres. At all local centres, in accordance with transport policies in the plan, all allocations should seek to maximise opportunities for localised improvements/ contributions to enhance sustainable travel modes.

Broadclyst

Strategic Policy SD07: Development allocations at Broadclyst

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

Land west of Whimple Road, Broadclyst (Brcl_12) combined with Land to east of Town End, Broadclyst (Brcl_29)

Development of these two sites, on the eastern side of the village, will need to come forward to an agreed Masterplan that provides for a comprehensive development

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scheme for both land areas. Vehicle access to the combined sites will need to be from Whimple Road with vehicle and pedestrian access from Brcl_12 linking through and into Brcl_29.

Area Brcl_12 - is to accommodate around 100 new homes and 0.6 hectares of employment land. Built form shall be focused on the land to the north west of Winter Gardens and south of Lake Farm with lower density development forming a frontage onto the road from Burrows Cross within the field to the north west of Winter Gardens. To the north of Brcl_12 there is scope to provide open space and habitat and other open space areas.

Area Brcl_29 – is to accommodate around 24 new homes and 0.1 hectares of employment land. Vehicle and pedestrian access routes will need to be provided to link into allocated land at Brcl_12. And there will need to pedestrian access to Green Tree Lane and /or Town End.

Budleigh Salterton

Strategic Policy SD08: Development allocations at Budleigh Salterton

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

Land at Barn Lane, Knowle, Budleigh Salterton (Budl_02)

This land on the northern side of Budleigh Salterton is allocated for 35 new dwellings. The site is located inside the East Devon National Landscape area and particular sensitivity will need to be attached to development proposals in respect of potential adverse landscape impacts. Site development will need to come forward with provision of safe footpath access to the Budleigh primary school. Site proximity to the Grade II* listed Tidwell House is such that significant care must be taken to avoid potential for adverse impacts on the property and its setting.

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Colyton

Strategic Policy SD09: Development allocations at Colyton

The sites/areas listed below are identified on the Policies Map and are allocated for development.

Land at Hillhead (Coly_02)

This site, to the west of Colyton, is allocated for 49 new homes. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented. Approach roads to this site are narrow, largely single width, and as such highway improvements may be needed with potential rerouting needed through the site.

Land adjacent to the Peace Memorial Playing Fields (Coly_06)

This site, adjacent to the Peace Memorial playing fields, is allocated for 12 new homes. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should inform the proposals for development of this site. However, more detailed flood assessment work and appropriate mitigation may be required as part of any proposal and should be assessed as part of a strategy informing proposals. Flood zone 3 land at the site may offer some scope for open space uses but should not form part of gardens, car parking or other features associated with individual plots.

To ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented. Development should explore the opportunity to widen the footway along frontage and deliver a suitable crossing, with best endeavours to avoid a crossroad type arrangement with Gribble Mead.

Lympstone

Strategic Policy SD10: Development allocations at Lympstone

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

Lymp_01 - Little Paddocks, 22 Underhill Crescent, Lympstone

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This site is allocated for 8 new homes. Additional tree planting should be provided along the southern boundary to mitigate the visual impact of the settlement edge upon the countryside beyond.

GH/ED/72a - Land at Meeting Lane, Lympstone

This site is allocated for 42 new homes. Tree planting along the western and northern edge should be provided to mitigate the impact upon Nutwell Park. A pedestrian link should connect with the existing footpath on Meeting Lane to the south. Development should explore opportunities for localised improvements/contributions (e.g at the Exmouth Road/Meeting Lane intersection).

GH/ED/73 - Land north west of Strawberry Hill, Lympstone

This site is allocated for 42 new homes. Built development should not occur in the triangular area in the centre of site that is a "lost" orchard and ridge and furrow. This area should be reinstated as an orchard or otherwise provided as open publicly accessible open space. A pedestrian link should connect with the existing footpath on Meeting Lane to the north west. Development should explore opportunities for localised improvements/contributions (e.g at the Exmouth Road/Meeting Lane intersection).

Woodbury

Strategic Policy SD11: Development allocations at Woodbury

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

Land to rear of Orchard House, Globe Hill, Woodbury (Wood_06)

This site is allocated for around 30 dwellings. The design and layout of development should reflect the key characteristics of Woodbury Conservation Area, adjoining to the east. Tree planting along the western boundary should be provided to soften the boundary edge with the countryside.

Land Off Globe Hill, Woodbury (Wood_09)

This site is allocated for around 28 dwellings. Development should include public open space and Green Infrastructure links (including the areas of flood zone 3) through the site to provide opportunities for the public to appreciate a key local landmark (Grade I

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listed Parish Church of St Swithun) and Woodbury Conservation Area. The design and layout of development should reflect the key characteristics of Woodbury Conservation Area, minimising the loss of existing mature hedgerow and trees.

Land at Gilbrook (Wood_10)

This site is allocated for around 60 dwellings. Development should incorporate pedestrian/cycle links into Gilbrook House and/or Beeches Close to the north, to offer direct access to the settlement centre. Development should incorporate tree planting that reflects the historic "lost" orchard that covered much of the site, with Green infrastructure opportunities along the flood plain in the eastern part of site. The design and layout of development should reflect the key characteristics of Woodbury Conservation Area to the north.

Land south of Broadway (Wood_16)

This site is allocated for around 70 dwellings. Suitable provision will need to be made for [pedestrians to safely cross the B3179 to access the pavement route to the village centre. Woodbury footpath 3, as it travels through the site, must be protected and enhanced.

Land east of Town Lane (Wood_20)

This site is allocated for around 28 dwellings. Development should ensure safe and suitable pedestrian access along Town Lane. Development should provide tree planting to extend the existing woodland to north, with a reduced building height or avoid built development in the eastern edge to minmise the impact on the surrounding countryside.

Service villages

5.11. There are 23 'service villages' that are identified as offering specific scope for development in the local plan, these are:

1. Beer,
2. Branscombe,
3. Broadhembury,
4. Chardstock,
13. Newton Poppleford,
14. Otterton,
15. Payhembury,
16. Plymtree,

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5. Clyst St Mary,
6. Dunkeswell,
7. East Budleigh,
8. Exton,
9. Feniton,
10. Hawkchurch,
11. Kilmington
12. Musbury,
17. Sidbury,
18. Stoke Canon,
19. Tipton St John,
20. Uplyme,
21. Westclyst,
22. West Hill,
23. Whimple.

5.12. All of the above villages have some local facilities that serve some of the needs of resident populations.

5.13. The above villages, except for Stoke Canon, have a Settlement Boundary around them, establishing in principle suitability for some development, essentially this can be expected to be around accommodating local need, and at some of them land is allocated for development through plan policies listed below.

Broadhembury

Strategic Policy SD12: Development allocation at Broadhembury

The site/area listed below, as identified on the Policies Map, is allocated for development.

Land opposite the Village Hall (Brhe_09)

The site is allocated for 10 homes. This site is particularly sensitive in heritage and landscape terms and careful detailed assessment and design work will be needed to ensure that the design respects the special character of the area. The site should be landscaped to provide boundary screening appropriate to the edge of National Landscape location. There is an absence of a defined pedestrian access to bus stops/local amenities, so opportunities to enhance this should be addressed through development.

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Any application to develop the site must include a study of the impact of development on the setting of the Church, which is a Grade I listed building, and the Conservation Area. Proposals must show how adverse impacts will be avoided and where appropriate impact on these heritage assets will be mitigated.

Chardstock

Strategic Policy SD13: Development allocation at Chardstock

The site/area listed below, as identified on the Policies Map, is allocated for development.

Land off Green Lane, Chardstock (Char_04a)

This site is allocated for around 30 dwellings.

Site proposals must include landscaping to include provision of appropriate boundary screening in respect of long-distance views to and from the Blackdown Hills National Landscape area.

Opportunities to provide a connection for residents to Public Right of Way Chardstock Footpath 30 are encouraged.

Clyst St Mary

Strategic Policy SD14: Development (Neighbourhood Plan led) at Clyst St Mary

Development of at least 72 dwellings will be accommodated at Clyst St Mary through allocations to be made through the Neighbourhood Plan.

Development at the village will need to come forward on sites that meet broader local plan policy requirements and that are well related, physically close to or abutting, the built form of the village.

Should development at Clyst St Mary have not started and progressed in a timely manner before 2030 there will be a review the need for allocations to be made in a future local plan (or similar plan document). After 2030, should housing development have not started, planning permission may be granted for windfall developments,

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outside of the settlement boundary for the village, to address part or all of the 72 dwelling shortfall where in compliance with wider local plan policies.

Dunkeswell

Strategic Policy SD15: Development allocation at Dunkeswell

The site/area listed below as identified on the Policies Map is allocated for development.

Broomfields, Dunkeswell (Dunk_05)

This site is proposed for 43 new homes.

A safe pedestrian footpath will need to be provided to enable access to local facilities. Ancient trees adjoining the site must be given specific protection through the development proposals.

East Budleigh

Strategic Policy SD16: Development allocation at East Budleigh

The site/area listed below as identified on the Policies Map is allocated for development.

Land off Frogmore Road (Ebud_01)

This site in East Budleigh site is allocated for 22 new homes. A high-quality development scheme is required for this prominent site noting its location in the East Devon National Landscape area and proximity of the Syon House as a non-designated heritage asset. Crossing provision over the B3178 should be provided for pedestrians and overhead wires across the site should relocated underground.

Exton

Strategic Policy SD17: Development allocations at Exton

The sites/areas listed below as identified on the Policies Map are allocated for development.

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Land west of Oaklands (Wood_01)

The site is allocated for around 14 dwellings. Suitable provision must be made for pedestrians to safely cross from the site across the A376 to enable easy access to facilities in the settlement, along with pedestrian/cycle links to Wood_28 adjacent to the south east.

Land north and east of Exton Farm (Wood_28)

The site is allocated for around 39 dwellings. Development will need to provide safe and suitable pedestrian and cycle access along Mill Lane south to the existing pedestrian crossing at the A376/Station Road junction, to enable easy access to facilities in the settlement. This pedestrian crossing should be upgraded to accommodate cyclists, to enable access the Exe Estuary Trail via Station Road. Development should provide pedestrian/cycle links to Wood_01 adjacent to north west. Development should include tree planting on the southern field to reflect their historic presence; and retain the hedgerow that disects the site, as far as practically possible. Development should address the existing flooding issues along Mill Lane.

Feniton

Strategic Policy SD18: Development allocations at Feniton

The sites/areas listed below, as shown on the Policies Map, are allocated for development at Feniton.

Land at Burlands Mead (Feni_05)

Land and buildings at Burland Mead is allocated for around 42 dwellings.

Land adjacent to Beechwood (Feni_08)

Land adjacent to Beechwoods is allocated for around 60 dwellings. Careful designed and implemented boundary treatment on the eastern side of the site will be required to form a soft edge to the countryside beyond.

Land to the south east of Bridge Cottages (Otry_20)

Land to the south east of Bridge Cottages is allocated for employment use. The site extends in total to around 4.64 hectares but phased development will be required. A first northerly phase of land, extending to around 2 hectares, will need to be fully built-out before development will be allowed on a southerly phase.

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Hawkchurch

Strategic Policy SD19: Development allocation at Hawkchurch

The site/area listed below as identified on the Policies Map is allocated for development.

Norton Store, Hawkchurch (Hawk_01)

This land is allocated for mixed-use redevelopment to retain the existing employment space and accommodate 12 dwellings plus a permanent location for the village shop and associated car and cycle parking and turning areas. The site should be landscaped to provide boundary screening appropriate to the location.

Kilmington

Strategic Policy SD20: Development allocations at Kilmington

The sites listed below, as shown on the policies map, are allocated for development:

Land east of George Lane (Kilm_09b)

Land east of George Lane is allocated for 23 homes. This site is in the East Devon National Landscape and requires very careful design to take account of its landscape setting. It is adjacent to Kilm_09a, which the made Kilmington Neighbourhood Plan, has allocated for 14 dwellings. A comprehensive development layout should cover both the Neighbourhood Plan allocated site (09a) and the local plan site (09b), with overall site proposal conforming with the design principles set out in Neighbourhood Plan policy. For Kilm_9b there must be buffer planting to the northern site boundary (along the A35) and footpath links to adjoining roads and paths, including to southern and northern site boundaries.

Land to the west and south west of the Old Inn (Kilm_10)

Land to the west and south west of the Old Inn is allocated for 5 homes. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be addressed through development proposals. This site is in the East Devon National Landscape and requires very careful design to take account of its landscape setting. A sensitively designed scheme will also be essential to avoid potential for

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adverse impacts on the listed adjoining public house. The preference is for highway access to this site to be gained from site Kilm_09b to the west.

Musbury

Strategic Policy SD21: Development allocation at Musbury

The sites/areas listed below are identified on the Policies Map and are identified for development.

Land at Baxter's Farm (Musb_01a)

The site is allocated for15 new homes with 0.06 hectares of employment uses. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential and an exception test have been undertaken as part of the local plan.

A high quality scheme is required at this site which is likely to require some conversions and some new build. The Council has prepared a Development Brief for this site (though there is no longer an expectation of the site providing Gypsy and Traveller pitches).

Newton Poppleford

Strategic Policy SD22: Development allocations at Newton Poppleford

The sites/areas listed below, as identified on the Policies Map, are allocated for development. A joint masterplan approach to the development of the two allocated sites would be appropriate.

Land to the West of Badger Close (Newt_04)

The site is allocated for 28 dwellings. This site is in the East Devon National Landscape and requires very careful design to take account of its landscape setting. Elevated parts of the eastern side of the site are especially sensitive and will require very careful planning at the design stage. There will need to be a footpath link provided from this site to site Newt_05 and thereafter past the property 'Permarita' and then on to the King Alfred Way development. This and any existing paths linking to King Alfred Way must, as part of any development (if not already carried out), be made good and

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surfaced for use in all weather conditions. No houses shall be occupied until the full footpath link is provided and made available for use.

Land to the east of Exmouth Road (Newt_05)

The site is allocated for 27 dwellings. This site is in the East Devon National Landscape and requires very careful design to take account of its landscape setting. Elevated parts of the eastern side of the site are especially sensitive and will require very careful planning at the design stage. No house shall be occupied until a footpath is provided and made available for use to the north of the site past the property 'Pemarita' and then on to King Alfred Way. This and any existing paths linking to King Alfred Way must, as part of any development (if not already carried out), be made good and surfaced for use in all weather conditions. No houses shall be occupied until the full footpath is provided and made available for use.

Otterton

Strategic Policy SD23: Development allocation at Otterton

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

Land north of Behind Hayes (Otto_01)

The site is allocated for 10 homes. There are significant heritage and landscape constraints at this site and the northwestern part of the site is not appropriate for built development. This land should be kept open and made available as a community open space/orchard or similar use. Development should be very carefully designed to ensure that it is compatible with the National Landscape and adequately mitigates any impact on the surrounding heritage assets. Vehicular access needs to be to the east/Orchard Drive.

Payhembury

Strategic Policy SD24: Development allocation at Payhembury

The site/area listed below, as identified on the Policies Map, is allocated for development.

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Land adjacent to Markers Park (Payh_03a)

This site is allocated for 15 homes.

Design and layout of proposals should be appropriate to this village gateway location and sensitively and appropriately take account of the topography of the site and the heritage and any ecological significance of the marl pit (a non-designated heritage asset) which must be retained in the end proposals. Access should be designed to retain existing mature trees and minimise hedgerow removal, whilst ensuring highway safety. No house shall be occupied until a footpath connection is provided with existing pedestrian routes to the centre of the village. Landscaping which responds appropriately to the introduction of built form in this location shall be provided, including the introduction of substantial boundary screening along the southern boundary to maintain the rural character of the lane and the significance of the setting of the Grade II listed Glebe Farm on the southern approach.

Plymtree

Strategic Policy SD25: Development allocation at Plymtree

The site/area listed below, as identified on the Policies Map, is allocated for development.

Land north of the School (Plym_03)

Land is allocated for 30 new homes and a community facility.

This site is particularly sensitive in heritage terms and detailed assessment will be needed to ensure that an acceptable design solution is reached that respects the special character of the area and the setting of the heritage assets around the site. Footpath links to local facilities will be required as part of the development. The development will need to maximise opportunities for localised improvements/ contributions to enhance sustainable travel modes.

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Sidbury

Strategic Policy SD26: Development allocation at Sidbury

The site/area listed below, as identified on the Policies Map, is allocated for development.

Land south of Furzehill (Sidm_34)

This site, to the south of Sidbury, is allocated for 43 new homes. Development of this site will enable the second phase of the Devon County Council proposed multi-use trail (routes used by a combination of cyclists, pedestrians and by/for other movement), ensuring delivery of the entirety of the route from Sidford to Sidbury. Vehicle access to the site will be via A375. Development would be expected to play its role in delivering part of the Sidbury to Sidmouth cycle route through the allocation.

In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented.

The site is within the East Devon National Landscape and particular care will be needed to avoid adverse impacts, especially on higher westerly site parts where open space provision may be appropriate. Listed buildings are found to the north and east of the site and the Sidbury Conservation Area also lies to the north; proposals will need to be carefully designed to avoid detrimental impacts on these heritage assets.

Tipton St John

Strategic Policy SD27: Development allocation at Tipton St John

The site/area listed below, as identified on the Policies Map, is allocated for development.

Land South of Otter Close (Otry_04)

This site is allocated for up to 5 self-build homes and a new primary school. Development of the dwellings will only be allowed once building work on a new school on this allocation site is completed and occupied. Should a new school not be built in Tipton St John the village would not meet the thresholds for a Tier 4 settlement and new houses will not be permitted at this site.

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West Hill

Strategic Policy SD28: Development allocations at West Hill

The sites/areas listed below, as identified on the Policies Map, are allocated for development. West_04 and West_18 should be brought forward as a collective development under and agreed masterplan, to ensure there is connectivity between both allocations. The developments will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Land adjoining Wind Mill Lane (West_04)

The site is allocated for around 34 dwellings. The site will need to deliver safe and accessible walking and cycling routes through to the primary school, shop and other facilities at the centre of the village via West_18 and adjoining land.

Land north and east of Eastfield (West_18)

This site is allocated for around 30 dwellings. The site will need to deliver safe and accessible walking and cycling routes through to the primary school, shop and other facilities at the centre of the village via adjoining land. The woodland in the northern part of the site must be retained and enhanced.

Whimple

Strategic Policy: SD29: Development allocations at Whimple

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

Land at Station Road (Whim_11)This site is proposed for 33 new homes. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be taken into account in any development proposals. There may be a need for a site-specific Flood Risk Assessment at this site to assess the risk of fluvial and surface water flooding and therefore to inform development proposals.

A line of trees to the site frontage and two trees within the field are subject to Tree Preservation Orders. These must be retained in development proposals.

Site layout should be planned to enable convenient east to west pedestrian and cycle links to the site frontage, but behind the existing hedge and protected trees.

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Development proposals should deliver a footway extension from the west and tie into the site. A pedestrian access opposite the Withy should be provided if compatible with protection of trees and highway safety. Careful attention should be paid to the setting of Slewton House, a Grade II listed building. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Land west of Bramley Gardens (Whim_08a)

The site is allocated for 50 homes and a community orchard. The residential development element of the scheme should be located south of the existing Bramley Gardens development. Provision of an orchard, that could include open space provision associated with new housing, will be encouraged on land to the north of the new houses. Access would need to be off Bramley Gardens. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

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Mitigating Climate Change



Chapter 6. Mitigating Climate Change

Reducing emissions and promoting low carbon and renewable energy development

6.1. The climate crisis is urgent, with the 2021 IPCC report[21] highlighting unprecedented warming and irreversible consequences. In response, East Devon District Council declared a climate emergency in 2019, committing to carbon neutrality by 2040 and endorsing the Devon Carbon Plan[22].

Strategic Policy CC01: Climate emergency

The East Devon target is to become carbon neutral by 2040, this overarching strategic policy for climate emergency requires developments to support East Devon becoming carbon neutral by 2040, through:

A. Supporting movement to net-zero development; and

B. Maximising opportunities for delivery of low carbon and renewable energy, district heat networks, and energy storage facilities.

Any development that by the nature of development design or subsequent operations will generate significant emissions will need clear justification for development that articulates how carbon saving approaches and methods, in design and operation, are incorporated into proposals.

This policy applies in the Cranbrook Plan area.

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[21] CCF-015 – IPCC Climate Change 2021: The Physical Science Basis, https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_FullReport_small.pdf [accessed 9th Jan 2025]

[22] CCF-014 – Devon Carbon Plan, https://devonclimateemergency.org.uk/wp-content/uploads/2022/11/Full-Carbon-Plan-22-11-2022.pdf [accessed 17th Jan 2025]

Justification for plan policy

6.2. This policy sets a target of achieving carbon neutrality in East Devon by 2040, aligning with the Council's climate emergency declaration. Subsequent policies in this chapter provide specific measures to achieve this overarching goal.

Strategic Policy CC02: Moving toward Net-zero carbon development

All new homes

All new homes (including conversions) will be required:

A. To meet energy efficiency requirements set out in the building regulation Future Homes Standard (FHS) 2025 or successor standards. If the FHS 2025 is not incorporated into Building Regulations by the date of Local Plan adoption, the draft standards as set out in - The Future Homes and Buildings Standards: 2023 consultation[23]) will be required in developments;

B. To be developed in a manner that ensures solar panels, heat pumps and other technologies (if not part of the initial development) can simply be fitted to and wired into new developments (with nil or minimal retrofitting); and

C. To be designed to avoid temperature discomfort as a result of rising temperatures.

Major non-residential new development

All major non-residential developments will be required to meet the latest BREEAM "Excellent" standard (or technical equivalent) unless it is demonstrated they cannot technically be complied with or render a proposal non-commercially viable. When the BREEAM "Excellent" standards are considered unachievable this should be supported by robust evidence.

All development

All developments will be required to demonstrate at the application stage that the relevant standards set out above will be achieved and that minimising the carbon footprint of the proposed development has informed the design and layout of the development. The agreed measures will be secured by either a condition or Section 106 agreement and developers will be required to submit a compliance certificate to demonstrate compliance following completion.

[23] CCF-021 – Future Homes and Buildings Standards: 2023 Consultation, *link to EDDC when available*

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This policy applies in the Cranbrook Plan area.

6.3. Ensuring new developments are energy efficient is fundamental to reducing carbon emissions. The policy follows the "energy hierarchy," prioritising building fabric improvements over renewable energy retrofits. Major non-residential developments must meet BREEAM “Excellent” standards, a widely recognised third-party accreditation for sustainability.

6.4. The policy aligns with national regulations and prioritises interventions to meet the net-zero target. Encouraging energy and carbon statements helps demonstrate a zero-carbon approach to construction and operation, promoting self-sufficiency in energy, waste, and water management.

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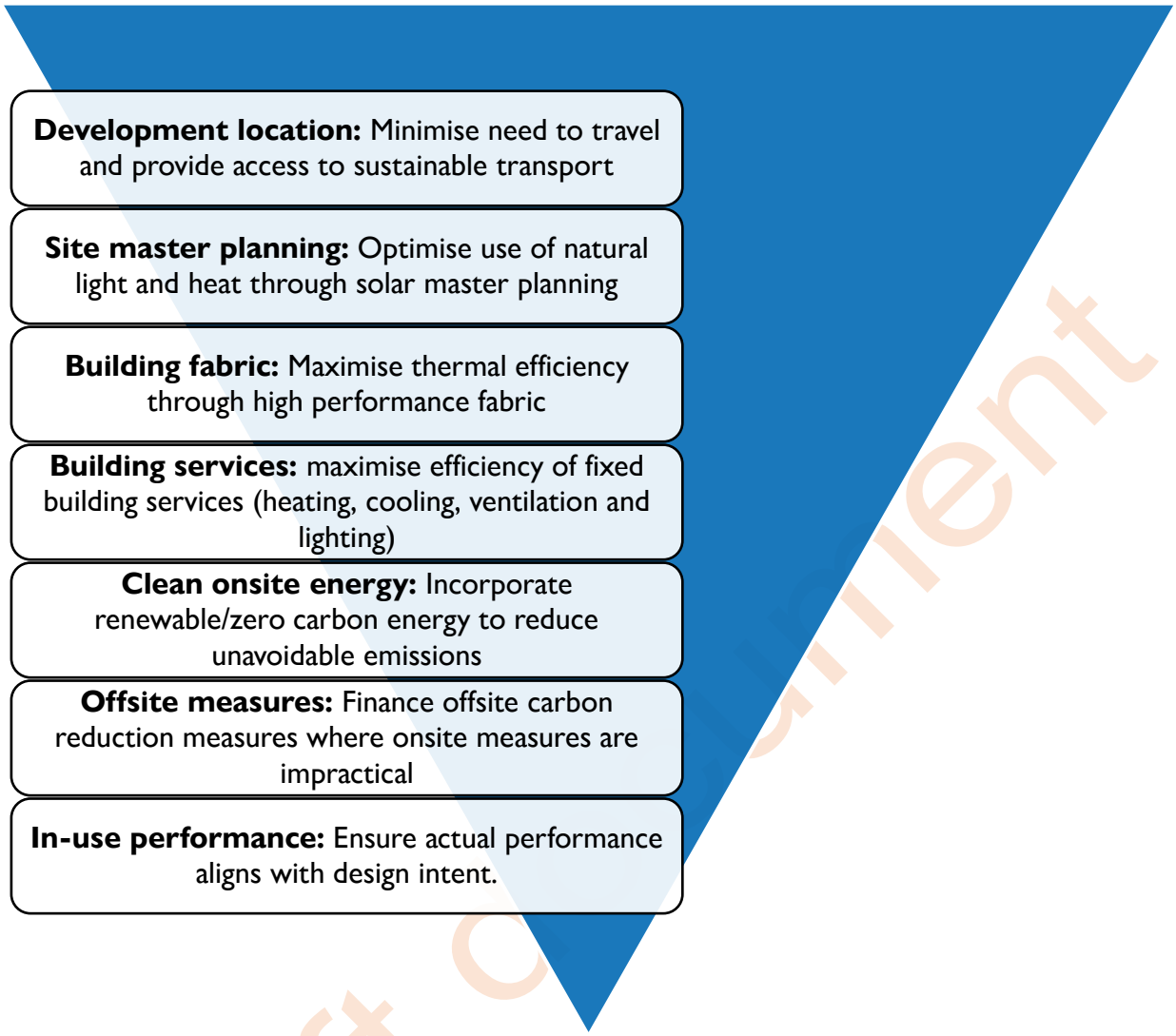


FIGURE 7 The Energy Hierarchy

Promoting low carbon and renewable energy

6.5. Encouraging low carbon and renewable energy developments is crucial for achieving climate objectives and ensuring sustainable energy sources.

Strategic Policy CC03: Promoting low carbon and renewable energy

Proposals for low carbon and renewable energy generating and storage schemes within the district will be supported in the context of sustainable development and climate change, provided that:

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A. There are no significant adverse impacts on the local environment that cannot be satisfactorily mitigated, including individual and cumulative landscape and visual impacts, as well as the character of wider historic townscapes, landscapes and seascapes; protected species and sites of ecological/geological importance;

B. Any farmland that is used allows for the continuation on the site for some form of appropriate agricultural activity or bio-diversity use proportionate to the scale of the proposal; and

C. Appropriate plans and a mechanism are in place for the removal of the technology on cessation of energy generation/ storage, and restoration of the site to its original use or an acceptable alternative use.

Development located within or affecting the setting of National Landscapes and the undeveloped coast, unless visual and other adverse impacts can be shown to be minimal or nil, will only be permitted where evidence shows that exceptional circumstances exist to justify development. Such development should be, where acceptable, small scale giving due regard to the natural beauty of these areas.

Proposals for wind farms will only be allowed in defined areas as shown on the Policies Map.

Planning permission for fossil fuel electricity or other energy generation will only be granted where there is a clear and compelling need for the project that addresses a recognisable system failure, and all viable renewable energy options, including energy storage solutions, must be thoroughly explored and deemed unsuitable for fossil fuels schemes to progress.

This policy applies in the Cranbrook Plan area.

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Justification for Plan Policy

6.6. The policy promotes low carbon and renewable energy technologies, such as geothermal, hydro, wind, solar, and anaerobic digestion systems, to ensure a sustainable energy supply. It identifies suitable areas for solar and wind energy developments while protecting sensitive areas, ensuring minimal environmental impact. The Low Carbon Study has identified areas suitable for these developments, excluding the most sensitive areas of the district.

6.7. Fossil fuel energy generation is only permitted in exceptional circumstances, such as for essential services like at hospitals that require backup power. This approach supports the transition to renewable energy sources, contributing significantly to the district's climate objectives and reducing reliance on fossil fuels.

Energy storage

6.8. Renewable energy generation often does not align with peak consumption times. Energy storage solutions are essential to balance this discrepancy and support the transition to renewable energy.

Strategic Policy CC04: Energy storage

Planning permission will be granted for electrical and other energy storage facilities to help achieve carbon neutrality and support renewable energy production and use in East Devon.

Proposals for development must have no significant and unacceptable adverse impacts on account of noise or environmental or amenity impacts. All schemes will need to be compliant with the most up to date guidance on fire safety and other health and safety matters.

Proposals should be located in or on the edge of built-up areas, and outside of protected landscape areas, unless alternative site options do not exist and locational requirements are so significant that a rural location is essential.

Proposals should not be in direct conflict with any policy in the development plan that allocates land for a different specified use or safeguards land unless the energy storage facility can be accommodated without compromising the policy intent and use of that land for the allocated purpose.

This policy applies in the Cranbrook Plan area.

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6.9. Energy storage technologies, including battery storage, allow surplus electricity to be stored and used when needed, facilitating the replacement of fossil fuels with renewable energy. This technology is crucial for a flexible energy system and reducing emissions to net zero. Battery storage systems are particularly important as we transition to electric vehicles and shift demand from peak times.

6.10. Favoured locations for storage are near suitable substations to provide grid services. The Low Carbon Study[24] highlights the importance of energy storage in achieving climate goals. Fire safety is a critical concern for battery energy storage systems (BESS). To address this issue, applications for new BESS projects must comply with the best available and most up to date guidance that exists. This should include, at the least, the latest National Fire Chiefs Council Guidance[25] though superseding guidance that may come through will also need to be complied with. Likewise best and most up to date guidance on any other safety matters or concerns should inform and be addressed in development proposals.

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[24] CCF-013 – 2020 Low Carbon and Climate Change Evidence Base for the Greater Exeter Strategic Plan, *link when uploaded to EDDC*

[25] CCF-018, Grid Scale Battery Energy Storage System Planning - Guidance for FRS, : *link when uploaded to EDDC*



FIGURE 8 Example Anesco battery storage facility (Source: Anesco, https://anesco.com/blog/2020/10/30/gore-street-energy-storage-acquires-battery-portfolio/)

Strategic heat networks

6.11. Strategic heat networks distribute heat from central plants to various consumers, offering a more efficient heating solution than individual boilers.

Strategic Policy CC05: Heat networks

For all major developments proposed within 1km of an existing heat network connection to the existing heat network should be provided.

When the connection is deemed undeliverable, evidence should be submitted to the planning authority's satisfaction to demonstrate why connections cannot be reasonably achieved. If the connection from the point of occupation cannot be provided, the development will be expected to incorporate, where feasible, infrastructure for future connection to the Heat Networks.

In addition, proposals above 1,200 homes or 10 ha of commercial floor space, if not connecting into an existing heat network will be required to provide their own network, unless it is demonstrated to be technically not achievable or significantly

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undermines commercial viability of development. Where allocation sites abut or are in close proximity to other allocation sites or developments, and the collective scale of development will exceed these thresholds, developers and applicants should work together to secure connections for the wider development schemes.

This policy applies in the Cranbrook Plan area.

6.12. Heat networks are essential for meeting climate targets, with the Committee on Climate Change suggesting that 20% of heating will need to come from district heating by 2050.[26] East Devon is well-positioned to embrace this trend, with existing networks at Cranbrook and Monkerton.

6.13. The Low Carbon Study[27] identifies opportunities for matching heat supply and demand and suggests that large-scale developments should investigate the potential for heat networks. The Local Plan's large-scale allocations present opportunities to utilise waste heat and connect to existing networks, increasing their efficiency and reliability.

Embodied carbon

6.14. The manufacture of building materials is a major source of greenhouse gases. Using existing building stock in development projects can significantly reduce embodied carbon.

Strategic Policy CC06: Embodied carbon

All development proposals should demonstrate actions taken to minimise embodied carbon and developers should retain existing buildings unless it can be demonstrated that refurbishment is either commercially unviable or impractical or has demonstrable comparative negative impacts.

Major development will be required to undertake an embodied carbon assessment, submitted as part of the Sustainability statement through a nationally recognised Whole Life Cycle Carbon Assessment procedure.

This policy applies in the Cranbrook Plan area.

[26] CCF-019 - The Future of Heating in UK Buildings, *link when uploaded to EDDC*

[27] CCF-013 – 2020 Low Carbon and Climate Change Evidence Base for the Greater Exeter Strategic Plan, *link when uploaded to EDDC*

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6.15. The environmental impact of producing construction materials is significant, with concrete alone responsible for 8% of global emissions[28]. The Royal Institution of Chartered Surveyors (RICS) estimates that 51% of the lifecycle carbon from a typical residential dwelling is emitted before the building is even occupied, and 35% for office developments.

6.16. Embodied carbon assessments should follow an endorsed methodology, such as the RICS Professional Statement Whole Life Carbon Assessment for the Built Environment[29], to accurately measure and reduce lifecycle carbon emissions. This policy encourages the retention and refurbishment of existing buildings to minimise the carbon footprint of new developments.

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[28] CCF-025 - Making Concrete Change: Innovation in Low-carbon Cement and Concrete, *link to EDDC*
[29] CCF-020 – Whole Life Carbon Assessment for the Built Environment, *link to EDDC when uploaded*

Adapting to Climate Change



Chapter 7. Adapting to Climate Change

Flood risk

7.1. National policy on flooding must be considered for developments at risk of flooding. The plan's policies and allocations are informed by a Strategic Flood Risk Assessment (SFRA)[30], which should also guide neighbourhood plans and development decisions. The SFRA provides a comprehensive analysis of flood risks from various sources, including rivers, the sea, and surface water, and incorporates future scenarios accounting for climate change.

7.2. Developers are encouraged to consult with East Devon District Council, Devon County Council, the Environment Agency, and South West Water early in the planning process to address flood risk, site-specific Flood Risk Assessments (FRAs), and appropriate mitigation measures. The Environment Agency is updating national flood risk information, which will include future climate change scenarios. The update will be published in Spring 2025 and may necessitate an update to evidence and changes to the plan.

Strategic Policy AR01: Flooding

All development should minimise the impact and mitigate the likely effects of climate change on existing and future occupants, together with the wider community and environment, through the delivery of developments and communities which are resistant and resilient to future floods. This will be achieved by:

A. Requiring development proposed in a flood risk location from any source to demonstrate that there is no sequentially preferable location and, if necessary, that development complies with the exception test (unless this has been undertaken through a site allocation in this plan);

B. Requiring a Flood Risk Assessment (where appropriate in terms of national planning policy and guidance) which demonstrates that the development, including the access and egress, will be safe for its lifetime, without increasing or

[30] CCF-002 – Strategic Flood Risk Assessment Level 1, *link to CFF evidence library page to allow access to all appendices*

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exacerbating flood risk elsewhere and where possible will reduce flood risk overall. For areas within 5 meters horizontal distance of Flood Zone 2, where there is no detailed modelling, assessment of this Zone with climate change will need to be undertaken in accordance with the most up-to-date Environment Agency hydrology, hydraulic modelling and flood risk mapping. Any flooding measures proposed in the FRA should respond to the specific requirements of the site and respect the character and biodiversity of the area. These FRAs should also identify opportunities for the development to provide wider community flood risk benefit through measures such as additional storage on site (oversized SuDS, natural flood management techniques, green infrastructure and green-blue corridors), and/ or by providing a Partnership Funding contribution towards any flood alleviation schemes;

C. Ensuring that space is provided on all development sites for the inclusion of SuDS designed to reduce the volume and rate of runoff to less than greenfield rates, as informed by the 'Sustainable Drainage System – Guidance for Devon'[31]. Surface water run-off should be managed as close to the source as possible. Preference will be given to systems that reduce pollution risks and contribute to the conservation and enhancement of biodiversity and green infrastructure where practicable. Within Critical Drainage Areas, SuDS should result in a reduction of existing runoff rates;

D. Protecting land required for flood management, including natural floodplains;

E. Not permitting proposals for basements in areas at risk of flooding; and

F. Where appropriate, the opportunity for Natural Flood Management in rural areas, SuDS retrofit in urban areas and river restoration should be maximised. Culverting should be opposed, and day-lighting existing culverts promoted through new developments.

Where a Level 2 SFRA has been undertaken on an allocated site, the 'Requirements and guidance for site-specific Flood Risk Assessment' set out in the relevant site sheet should be taken into account when submitting an application and designing a scheme.[32]

[31] CCF-024 – Sustainable Drainage System – Guidance for Devon, https://www.devon.gov.uk/floodriskmanagement/document/sustainable-drainage-system-guidance-for-devon-2023/ [accessed 16th Jan 2025]

[32] CCF-003 – Strategic Flood Risk Assessment Level 2, *link to CCF page in library when published*

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The SFRA has shown that some catchments are at a high risk of cumulative flooding. In these areas, development proposals should help to reduce flood risk overall by demonstrating that:

A. The design and layout of the proposed development safeguards any areas identified in the Natural Processes Mapping for floodplain reconnection, riparian woodland, additional floodplain woodland or runoff attenuation features;

B. Any FRA considers the potential cumulative effects of all proposed development and how this affects sensitive receptors; and

C. There is a suitable surface water management plan for storm events during construction to support the Construction Drainage Phasing Plan.

This policy applies in the Cranbrook Plan area.

Justification for policy

7.3. Certain areas in the District face flood risks from rivers, the sea, and surface water, which are likely to worsen with climate change. The NPPF advises directing development away from high-risk flood areas. This policy is based on the recommendations of the SFRA.

Water supply

7.4. Population growth, climate change, and environmental protection measures put pressure on water resources, contributing to water stress. This policy addresses these issues.

Strategic Policy AR02: Water efficiency

To minimise impact on the water environment all new dwellings should achieve the Optional Technical Housing Standard of 110 litres per day per person for water efficiency as described by Building Regulation G2[33].

This policy applies in the Cranbrook Plan area.

[33] CCF-022 – Approved Document G: Requirement G2 Water Efficiency, *Link to EDDC when uploaed*

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Justification for policy

7.5. Building Regulations set a water efficiency standard of 125 litres per person per day, with an optional requirement of 110 litres per day for new residential development. The water cycle study provides evidence for adopting the stricter standard of 110 litres per day in East Devon to address water stress.

Coastal change

7.6. East Devon faces significant challenges from coastal erosion and increased risk of permanent coastal flooding, exacerbated by climate change. While coastal defences may be appropriate in some areas, they are often costly and environmentally damaging. In many cases, allowing natural processes to occur is the best approach. This plan identifies potential impacts and develops policies to ensure risks are considered in development decisions.

Coastal Change Management Areas

7.7. We have collaborated with the University of Plymouth to predict coastal erosion and flooding, mapping areas vulnerable to coastal change over the next 20, 50, and 100 years[34]. This work, aligned with the National Planning Policy Framework, forms the basis for identifying Coastal Change Management Areas (CCMAs)[35]. Detailed assessments, such as Beach Management Plans, have refined these areas.

7.8. The Environment Agency will publish updated national flood and coastal erosion risk data in January 2025, which will be considered before finalising the plan for submission. Given the complexity of this topic, supplementary planning guidance is recommended to detail the practical implementation of the CCMA approach.

Policy AR03: Coastal Change Management Areas (CCMAs)

Within the Coastal Change Management Area (CCMA) defined on the Policies Map, proposals for new residential development, including the conversion of existing buildings, will not be permitted.

[34] CCF-008 – Coastal Change Management Areas Methodology Report, *link to EEDC*

[35] CCF-007 – Coastal Change Briefing Paper, *Link to EDDC*

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Applications for non-residential development within the CCMA will be assessed in relation to the most up-to-date evidence available for when coastal change can be expected so that:

0-to-20-year time horizon - In parts of the CCMA expected to be at risk within a 0-to-20-year time horizon (2020 to 2040), only the following developments will be allowed:

A. Temporary development directly related to the coast, such as beach huts, cafes, car parks or sites used for touring caravan and camping;

B. Temporary modifications to other existing commercial facilities where a positive link can be made to the local economy;

C. Mitigation measures for dealing with coastal change that are in accordance with the relevant coastal strategy; or

D. Nationally significant infrastructure projects related to offshore development that are constructed to withstand the impacts of the expected coastal change.

20-to-50 year time horizon

In parts of the CCMA expected to be at risk within a 20-to-50 year time horizon (2040 to 2090), in addition to the development allowed in the 0 to 20 years zone the replacement, relocation and adaptation of infrastructure, commercial and community uses will be permitted, providing they require a coastal location and provide economic and/or social benefits to the local community.

50-to-100 year time horizon

In parts of the CCMA expected to be at risk within a 50 to 100 year time horizon (beyond 2090), in addition to the development allowed in the 0 to 50 year zones, extensions to residential properties and householder applications may be acceptable.

All applications for development within a CCMA must show that it would not result in an increased risk to life or any property through the submission of a coastal change vulnerability assessment, which should be proportionate to the scale and nature of the development.

Planning permission for all development in a CCMA will be time limited according to the risk identified in the coastal erosion vulnerability assessment.

This policy does not apply in the Cranbrook Plan area.

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Justification for policy

7.9. The NPPF requires plans to reduce the risk of coastal change by avoiding inappropriate development in vulnerable areas and identifying Coastal Change Management Areas (CCMAs). CCMAs are not necessary where the Shoreline Management Plan[36] policy is to 'hold the line' and can be maintained over the plan's lifetime. Generally, the centres of main coastal settlements are defended, so CCMAs are not identified for town centres. This policy aligns with national guidelines and will be supported by supplementary planning guidance for detailed implementation.

Relocation of uses affected by coastal change

7.10. Where evidence shows that certain existing uses are vulnerable to coastal change in the short term, relocation to safer areas may be allowed.

Policy AR04: Relocation of uses affected by coastal change

Where there is robust evidence to demonstrate that permanent homes (with unrestrictive occupancy) or community facilities, commercial or business uses that are considered important to coastal communities are likely to be affected by coastal erosion within 20 years of the date of the proposal, proposals for relocation/replacement, including outside of settlement boundaries, will be considered favourably subject to the following criteria:

A. The new development is located in an area at less risk of coastal erosion;

B. The replacement property is located close to the community from which it is displaced and has an acceptable relationship with it in terms of character, setting, local amenity and any special landscape designations;

C. Overall, taking both the existing and proposed buildings into account, the proposal should not have an additional detrimental impact on the landscape, townscape or biodiversity of the area, taking into account any special designations;

D. The existing site is either cleared and restored with enhancements for nature conservation or put to use to benefit the local community within three months of the first use of the replacement. The future use of the site should be secured in

[36] CCF-10 – Shoreline Management Plan, https://environment.data.gov.uk/shoreline-planning/shoreline-management-plan/SMP16#actionplan [accessed 13th Jan 2025]

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perpetuity and provision made for public access to the coast where appropriate; and

E. In the case of a residential proposal, the gross floorspace of the replacement dwelling is no larger than the one it is to replace.

This policy does not apply in the Cranbrook Plan area.

Justification for policy

7.11. Some buildings and uses may be lost to the sea within the plan period. This 'rollback' policy provides flexibility for relocation if necessary.

Development affecting coastal erosion

7.12. The national and local approach to coastal erosion, as set out in the Shoreline Management Plan (SMP), is to defend main settlements and allow natural processes in rural areas. Large parts of the coastline are inscribed as a World Heritage Site, which relies on natural processes continuing.

Policy AR05: Development affecting coastal erosion

Where compatible with the most up-to-date coastal policy (as expressed in the SMP or a strategy such as a beach management plan), the Council will promote proposals for sustainable coastal change management such as improvements to coastal defences or managed realignment, provided that they would not have an unacceptable adverse economic, social or environmental impact, including an unacceptable detrimental visual impact on a protected landscape.

To protect the integrity of the Dorset and East Devon World Heritage Site, the natural processes that created it will be allowed to continue, unless the safety and economic well-being of any coastal community would be undermined, provided that the implications of this for the World Heritage Site have been fully considered.

Where there is a conflict between allowing coastal erosion and protecting coastal communities from that erosion both interests will be recognised and wherever possible impacts will be mitigated where they arise.

Schemes that are incompatible with coastal policy are will not be supported.

This policy does not apply in the Cranbrook Plan area.

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Justification for policy

7.13. This policy balances the need for protective measures with the integrity of the World Heritage Site, which relies on coastal change processes. Both interests will be assessed in planning proposals to guide decision-makers and determine mitigation measures. This policy is relevant for applications like rock groynes/islands in beach management plans.

Links to marine planning

7.14. The NPPF requires local plans to consider the UK Marine Policy Statement and marine plans. The South Marine Plan[37] covers marine activities and overlaps with land planning in the intertidal zone. No conflicts have been identified between the marine and local plans.

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[37] CCF-023 – South Marine Plan, https://www.gov.uk/government/publications/the-south-marine-plans-documents [accessed 13th Jan 2025]

Meeting Housing Needs



Chapter 8. Meeting Housing Needs

8.1. This strategic policy aims to meet the housing needs of East Devon by providing a mix of decent, affordable homes that are safe, secure, and adaptable to changing needs.

Strategic Policy HN01: Housing to address needs

All proposals for housing, including those affecting the existing housing stock, will contribute to creating sustainable, inclusive and mixed communities in East Devon. This will be achieved by providing an appropriate mix of decent, good quality homes which meet identified needs for housing as identified in a neighbourhood plan, local needs assessment or other evidence document over the plan period, at locations consistent with the settlement hierarchy and the spatial strategy.

To achieve this the Council will:

A. Seek to maximise the delivery of affordable housing across East Devon in order to meet identified needs of people who are not able to access the general housing market;

B. Support proposals for the development of specialist accommodation that increase choice, including for older, vulnerable and disabled residents;

C. Support development of dwellings most suited to younger people noting the importance of housing to support and nurture a younger workforce;

D. Seek the use of good quality adaptable housing designs that provide flexible internal layouts and will allow for cost-effective alterations to meet changing needs over a lifetime and reduce fuel poverty;

E. Work with developers, registered providers, landowners and relevant individuals or groups to address identified local demand for self and custom build homes as identified in the East Devon Self and Custom Build Register; and

F. Support the retention and improvement of private rented accommodation, the provision of shared accommodation for single people, and proposals for the development of community-led housing schemes.

Proposals for housing development will be supported where they broaden choice and reflect and respond to the existing and future needs as identified in the Local Housing Needs Assessment or successor documents, and in up-to-date local housing need evidence assessments.

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Proposals for housing development will provide a mix of house types, tenures and sizes appropriate to the area. This will be subject to the ability of a site to accommodate a mix of housing, and relevant, up to date evidence of market conditions. Housing mix will be achieved by:

A. Inclusion of affordable housing to meet affordable housing needs over the plan period, particularly the needs of younger people.

B. A range of housing suitable for households with specialist needs, including:

1. Dwellings for older people who want to retain independent living;
2. Adaptable and accessible housing and wheelchair user housing;
3. Use Class C2 accommodation including care homes.

C. Market housing for rent as well as for home ownership.

D. Serviced plots of land for self-build and custom housebuilding.

E. Gypsy and Travellers and Travelling Showpeople accommodation.

This policy applies in the Cranbrook Plan area.

Justification for policy

8.2. The policy ensures housing development addresses local needs, supporting sustainable, inclusive communities. It aligns with national policy requirements and provides a framework for other housing policies, avoiding duplication. The policy aims to deliver affordable housing, specialist accommodation, and adaptable designs to meet diverse and evolving needs. Key evidence is provided by the Local Housing Needs Assessment[38], which identifies local housing demands and needs for specific groups.

Affordable housing

8.3. Affordability and lack of sufficient affordable housing are major issues in East Devon, with high house prices and rents. This policy aims to increase affordable housing, particularly for young households

[38] HOU-002 – Local Housing Needs Assessment - https://eastdevon.gov.uk/media/3724890/east-devon-lhna-final-accessible-160922.pdf

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Strategic Policy HN02: Affordable housing

To foster balanced and mixed communities affordable housing will be required on all developments, unless exempted under this policy, with a capacity of 5 or more dwellings in designated rural areas and 10 or more in non-designated rural areas. Specifically included under policy are schemes for specialist housing for older people, which must provide affordable housing, where the site is delivering self-contained units (C3 and C2). Provision must accord with the levels set out below.

Location	Affordable housing as a percentage of the site total	Tenure mix of the affordable housing requirement
Second new community	New community % to be defined through bespoke viability work for the new community – to be defined through further Reg 19 consultation.	New community % to be defined through bespoke viability work - see further Reg 19 consultation.
Rest of East Devon (**excluding** those parts of the Cranbrook Plan area that fall within Cranbrook Plan Built-up Area Boundaries)	**35% affordable housing at:** • Any site allocated for development at the West End (see plan chapter 5) • Any allocated site in Sidmouth and Budleigh Salterton, as falling within the settlement boundaries. • Any windfall site across any part of East Devon, inside or outside settlement boundaries, that are not allocated for housing development. **30% affordable housing at:** • All other local plan allocated sites (with the exception of at Axminster). • **25% affordable housing at:** • Axminster, as falling within the Settlement Boundary.	• 65% Social Rent • 35% Intermediate or other forms of affordable housing At Axminster there will be flexibility, through consideration of viability assessments and where schemes are non-viable, to vary tenure percentages.

Affordable housing secured through policy must:

A. Remain affordable in perpetuity. Legal agreements will make provision for achieving clawback on long term, phased schemes if affordable housing is converted to another tenure;

B. Be provided on-site and dispersed in small clusters across the site in a way that is indistinguishable in terms of design and materials from any market housing.

Off-site provision or financial contributions will only be acceptable where on-site provision cannot be achieved or is non-viable or it can be clearly established that off-site provision will generate better affordable housing delivery outcomes.

Affordable housing should provide a mix of property sizes and types across the site, demonstrating how the site responds to robust, up to date evidence about housing need.

Where the requirements set out in this policy are not proposed to be met, applicants must submit development viability evidence to justify departure. Where a lower percentage level or differing tenure mix of provision is agreed on viability grounds developers will be required to enter into an agreement that allows affordable housing contributions to be made in the future should higher levels become viable (e.g. through an 'overage' clause). The Council will also reappraise viability on subsequent phases of large schemes.

Where Build to Rent schemes are proposed as part of the mix, at least 20% will need to be affordable private rent homes provided on site at a level of at least 20% discount. All homes on the scheme will be managed collectively by a single build to rent landlord.

Residential institutions (including C2 care homes and student accommodation) and gypsy and traveller accommodation are exempt from this policy.

This policy applies to those parts of the Cranbrook Plan area that fall outside of the Cranbrook Plan Built-up Area Boundaries.

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Justification for policy

8.4. This policy ensures the delivery of affordable housing to support balanced and mixed communities. It aligns with national and local policies, addressing the need for affordable homes due to high prices and rents. The policy specifies affordable housing requirements for different areas and types of development, ensuring affordability in perpetuity and integration with market housing. Off-site provision or financial

contributions are considered only when on-site provision is unfeasible. The policy is supported by local evidence from the East Devon Local Housing Needs Assessment[39], ensuring it meets the district's needs.

Housing to meet the needs of older people

8.5. This policy aims to widen housing choices for older people in East Devon by securing a diverse supply of market and affordable housing, including specialist accommodation.

Policy HN03: Housing to meet the needs of older people

The Council will support development that widens choice by securing a more diverse supply of market and affordable housing for older people in East Devon. Specialist affordable housing for older people, falling under this policy, will specifically include:

A. Residential care homes and nursing homes;

B. Extra care housing or housing-with-care;

C. Retirement living or sheltered housing;

D. Age-restricted general market housing.

Any development proposals with housing to accommodate older people will need to:

1. Demonstrate how the design and layout addresses the health and well-being needs of older people including, where appropriate to the proposal, those with dementia and other long-term conditions;
2. Locate all older person housing within 400 meters walking distance of local facilities and shops;
3. Be well-served by public transport;
4. Have high levels of accessibility with flat or relatively flat neighbouring topography, dropped kerbs and pedestrian road crossings to promote access by ambulant older people, wheelchair users and mobility scooters;
5. Provide adequate communal facilities, including on-site accommodation where required, for essential staff;

[39] HOU-002 – Local Housing Needs Assessment - https://eastdevon.gov.uk/media/3724890/east-devon-lhna-final-accessible-160922.pdf

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6. Be supported by a Care Needs Assessment to justify the development proposal's scale, tenure and accommodation type.

Planning applications for different types of specialist housing for older people, will be determined on the basis that:

Use Class C3 (dwellings) - Market accommodation for older people in the form of age restricted general market housing, retirement living or sheltered housing and extra care housing or housing with care are in Use Class C3 (dwellings);

Use Class C2 - Residential care home and nursing home accommodation (including end of life/hospice care and dementia care home accommodation) are in Use Class C2;

The Use Class of other specialist housing products will be determined taking into consideration the level of care and scale of communal facilities.

All general housing proposals, subject to commercially viability, will be required to deliver specialist housing for older people as follows:

1. Schemes for 50 to 199 dwellings should include at least 10% of dwellings on-site as specialist older person dwellings (Use Class C3);
2. Schemes for 200 or more dwellings should include at least 10% as on-site as specialist older person dwellings as either C3 dwellings and/or C2 equivalents.

Planning permission that would result in the loss of specialist elderly person housing will be refused unless:

1. Evidence demonstrates that there is no longer a need in East Devon for that type of housing; and
2. The housing cannot be converted to meet other types of older person need, or that conversion, remodelling, or redevelopment to specialist housing to meet other social care and health needs is not viable.

This policy applies in the Cranbrook Plan area noting that there may be viability impacts at Cranbrook that will need to be taken into account at planning application stage. .

Justification for policy

8.6. This policy addresses the growing need for diverse housing options for East Devon's ageing population. It supports the development of specialist housing, such as care homes and extra care housing, ensuring these are well-designed, accessible, and located near local facilities.

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8.7. The policy requires developments to demonstrate how they meet the health and well-being needs of older people, including those with dementia. It also mandates a mix of housing types and sizes, with a minimum percentage of specialist housing in larger developments. The policy aligns with national guidelines and local evidence, including the Local Housing Needs Assessment 2022, to ensure it meets the district's needs. The needs of older people are diverse and may change over time. Their health, lifestyles, income and wealth differ greatly, as will their housing needs. Offering older people a better choice of accommodation to suit their changing needs helps them to live independently for longer within their communities. Given this, there is an increasing demand for housing that is specialised for older people, with a requirement for both open market and affordable provision.

8.8. It is, however, noted that some older people may not want or need specialist housing, at least not immediately, but prefer to stay or move to general housing that is already suitable, including homes that can be adapted.

8.9. Based on the Refresh of the Commissioning Strategy for Extra Care Housing 2015 by Devon County Council, the projected demand for extra care housing is 522 units in East Devon (excluding Cranbrook) up to 2033.

Accessible and adaptable housing

8.10. This policy ensures new homes in East Devon are accessible and adaptable, meeting current and future needs by adhering to specific building regulations.

Policy HN04: Accessible and adaptable Housing

To ensure that new homes provide quality living environments for residents both now and in the future, the following standards from Building Regulations Approved Document M: Volume 1 (Access to and use of dwellings) (or replacement standards) will apply to new dwellings, subject to consideration of site suitability and site viability:

A. 100% of all new dwellings will meet building regulation M4 (2) requirements (accessible and adaptable dwellings);

B. 100% of all new specialist accommodation for older people will meet regulation M4 (3) requirements (a) or (b) (wheelchair user dwellings);

C. 100% of new specialist accommodation for older people will meet regulation M4 (3) (2) (b) requirements (wheelchair accessible dwellings) for those dwellings where

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the local authority is responsible for allocating or nominating a person to live in a dwelling;

D. At least 5% of all new affordable housing for rent will meet building regulation M4 (3) (2) (a) requirements (wheelchair adaptable); and

E. At least 5% of all new affordable housing for homeownership will meet regulation M4 (3) (2) requirements (a) or (b) (wheelchair user dwellings).

When providing wheelchair user housing, early discussion with the Council is required to obtain the most up to date information on specific need for this type of housing in the local area.

This policy applies in the Cranbrook Plan area.

Justification for policy

8.11. This policy requires that all new dwellings meet accessibility and adaptability standards, supporting residents with varying needs. It aligns with the government's approach to sustaining people at home and requires compliance with Building Regulations M4(2) and M4(3)[40].

8.12. The East Devon Local Housing Needs Assessment 2022 highlights the growing need for accessible homes due to an ageing population. By 2040, an additional 12,959 households will need either adaptations to their existing homes or new accessible housing.

8.13. The policy specifies that 100% of new dwellings must meet M4(2) requirements, ensuring they are accessible and adaptable. For specialist accommodation for older people, 100% must meet M4(3) requirements, with specific provisions for wheelchair user dwellings.

8.14. At least 5% of new affordable housing for rent and homeownership must meet M4(3) requirements, addressing the need for wheelchair adaptable and accessible homes. Early discussions with the Council are required to obtain up-to-date information on the specific need for wheelchair user housing in the local area.

[40] HOU-018 – The Building Regulations 2010 Approved Document M Volume 1: Dwellings, *link to EDDC library when available*

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8.15. The policy aligns with national guidelines, including the NPPF and PPG[41] on Housing for Older and Disabled People. It ensures that plans use optional technical housing standards to bring forward an adequate supply of accessible housing. The percentages and circumstances for these requirements are guided by evidence from the Local Housing Need Assessment 2022 and the Local Plan spatial strategy.

8.16. The Council's ability to require wheelchair accessible housing is limited to dwellings where it is responsible for allocating or nominating residents. These are typically affordable dwellings for social or affordable rent, secured through S106 legal agreements. Planning applications should include an Affordable Housing Statement detailing the number and types of affordable housing units.

8.17. Where site conditions or viability preclude the provision of specialist housing, the policy requires that housing meets at least M4(1) standards. This ensures that all new housing provides a basic level of accessibility, even if higher standards cannot be met.

Self-build and custom build housing

8.18. This policy supports custom and self-build housing to meet diverse housing needs, encourage high-quality design, and provide opportunities for individuals to build their own homes.

Policy HN05: Self-build and custom build housing

As part of meeting housing needs, securing greater housing diversity and encouraging high quality design, proposals for custom and self-build housing, to be occupied by those persons commissioning or undertaking the construction, will be supported.

At least 5% of dwellings on sites planned to accommodate 20 or more homes must be delivered as serviced custom and self-build plots.

The agreed plots should:

A. Be actively marketed to individuals and/or custom build companies in accordance with a marketing and pricing strategy that shall be agreed in writing with the Local Planning Authority in advance of a plot/s being first marketed. All plots shall be

[41] KSD-007 – Planning Practice Guidance (PPG), https://www.gov.uk/government/collections/planning-practice-guidance [accessed 13th Jan 2025]

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marketed at a reasonable price to reflect market conditions for at least 24 months from being fully serviced and developable. Any plots that have not been sold after 2 years of being continuously marketed in accordance with this policy shall be made available for development on the open market;

B. Have suitable road access delivered at an early stage in the development;

C. Be of a size that reflects local demand and, where more than one plot is provided, a variety of sizes should be offered to reflect the range of local demand; and

D. Be offered for sale with no legal or physical restrictions that would prevent immediate purchase and development;

On sites of over 250 dwellings or more, a proportion of plots must be made available for affordable housing, to be secured through legal agreement, subject to viability.

On sites of over 100 dwellings or more, design codes should be used flexibly to encourage high quality housing design and the agreed design code should be used to provide 'plot passports' that provide a simple, succinct summary of each plot as a reference point for the purchaser.

All self and custom-built housing must be completed within 3 years of the self or custom builder purchasing the serviced and developable plot.

This policy applies to all parts of the Cranbrook Plan area that fall outside of the Cranbrook Plan Built-up Area Boundary.

Justification for policy

8.19. Custom and self-build housing contributes to the overall housing supply, offering an alternative to mainstream housing delivered by large developers. It allows individuals to tailor homes to their specific needs and can lead to cost savings, as there is no developer profit. This approach can boost housing supply, diversify land use, and widen housing choices.

8.20. Communities benefit from custom and self-build homes through improved design, build quality, and environmental sustainability. These homes often use modern construction methods and high specifications, enhancing the sustainability of the housing stock. Additionally, self-build projects can support local businesses and create employment opportunities by engaging local tradespeople and supply chains.

8.21. This policy does not apply to off-plan housing, where homes are purchased before construction without buyer input into design and layout. Instead, it focuses on self-build models, including individual projects, community collaborations, and supported

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community self-builds. These models can involve various organizations, such as Community Led Housing Groups, Community Land Trusts, Co-operatives, and Cohousing groups.

8.22. Under the Self Build and Custom Housebuilding Act 2015[42], the Council maintains a register of individuals seeking serviced plots for self-build and custom housebuilding. The Council must consider this register and provide suitable development permissions to meet identified demand. The Act defines self-build and custom build housing, ensuring clarity and consistency in policy application.

8.23. Since 2016, the Council has kept a register[43] of people interested in building their own homes in East Devon. This register provides insights into the level of interest, budget constraints, and location preferences of potential self-builders.

Sub-dividing or replacing existing buildings and dwellings

8.24. This policy supports the sub-division and replacement of existing dwellings to meet housing needs, reduce carbon footprints, and reuse existing resources within established communities.

Policy HN06: Sub-dividing or replacing existing buildings and dwellings

Inside or outside of settlement boundaries any residential sub-division of existing dwellings or buildings must:

A. Avoid any materially adverse impact on the character and amenities of the surrounding area or on the existing building;

B. Minimise hard surfacing of front gardens and ensure hard surfaced areas are permeable and/or discharge to a soakaway (subject to soil conditions being suitable);

C. Ensure that adequate space is provided for bicycle/mobility scooter storage; and

[42] HOU-016 – Self-build and Custom Housebuilding Act 2015, https://www.gov.uk/guidance/self-build-and-custom-housebuilding [accessed 9th Jan 2015]

[43] HOU-017 – Self-build and Custom build Monitoring, https://eastdevon.gov.uk/planning/planning-policy/housing-issues/self-build-and-custom-build/monitoring/#article-content

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D. Provide an adequate external area for amenity and private use, car parking, waste/recycling storage and for any shared use area such as outdoor drying of washing.

Replacement of existing dwelling or conversion of an existing building outside of a Settlement Boundary - exceptionally, where a replacement dwelling or building conversion can justified outside settlement boundaries all of the above sub-division considerations must be met, and the following criteria must also be met:

A. Prior to the first occupation of any replacement dwelling, the dwelling which is to be replaced must be demolished;

B. Any replacement dwelling, or building works associated with conversion, must be positioned on the footprint of the existing dwelling, unless there are clear planning or environmental benefit to justify an alternative location within the existing curtilage;

C. The height, scale and massings hall be in keeping with the character of the area and not harmful to neighbouring residential amenities, the street scene or the wider landscape;

D. The floorspace (including garages, outbuildings and any inhabitable space) of any replacement dwelling, or subdivided or converted building including any extension, must not exceed by more than 30% that of the building to be replaced (or the building to be converted/subdivided); and

E. The curtilage of the proposed replacement, or subdivided or converted building including any extension, must be no greater in area than that of the existing dwelling/building.

This policy applies to all parts of the Cranbrook Plan area.

Justification for policy

8.25. Self-contained flats from house conversions add valuable housing stock and meet changing needs. Reusing and converting buildings reduces the carbon footprint and promotes sustainable development. The policy restricts replacing existing buildings to exceptional circumstances, aligning with the embedded carbon policy.

8.26. For sub-divisions, the policy ensures developments avoid adverse impacts on the area, requiring provisions for storage, parking, and sustainable drainage. Replacement dwellings outside settlement boundaries must meet additional criteria, including

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demolishing the existing dwelling before occupation of the new one and limiting the height and footprint of the new dwelling.

8.27. The policy supports the Council's Housing Strategy and aligns with the NPPF's emphasis on sustainable development. It addresses affordability issues, particularly in rural areas, by retaining smaller dwellings. Certain developments, like the reuse of redundant buildings, are not subject to this policy but may be covered by other policies.

8.28. The policy promotes effective land use, boosting housing supply through subdivision and conversion. It reduces the risk of dwellings becoming vacant and derelict, preserving housing stock. The policy also mitigates environmental impacts, preserving the character and amenity of the area.

Householder Annexes, Extensions, Alterations and Outbuildings

8.29. This policy supports householder annexes, extensions, alterations, and outbuildings to meet changing needs while maintaining the character and sustainability of existing dwellings.

Policy HN07: Householder annexes, extensions, alterations or outbuildings outside settlement boundaries

Outside settlement boundaries proposals for ancillary or incidental annexes, extensions, alterations or outbuildings, must relate well to the existing dwellings and must:

A. Be of a subordinate scale, form, and mass to the main dwelling and curtilage, and shall accord with the design principles of the Local Plan;

B. Be located entirely within the existing curtilage of the main dwelling; and

C. Not increase the habitable Gross Internal (floor) Area[44] of the original dwelling (as it was in 1945 or as built if after 1948) by more than 30%, unless the increase is required to enable the host dwelling to conform to nationally described technical housing standards for its original intended use. In exceptional circumstances, development may be considered where a minor increase above 30% is justified to improve design standards.

[44] Technical housing standards – nationally described space standard - GOV.UK (www.gov.uk)

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The development of annexes, extensions, alterations, and outbuildings, other than of small or incidental scale, will not usually be permitted where the host dwelling is:

A. An affordable dwelling; or

B. An agricultural worker's dwelling;

Unless the proposal is fully justified in relation to the need for the additional accommodation and how this is necessary given the restricted use of the property.

A condition and/or legal agreement may be required to control future use as incidental or ancillary to the use of the main dwelling, preventing subdivision or use as a separate planning unit, in perpetuity. Permitted development rights for future extensions or outbuildings may also be restricted by condition.

This policy applies in the Cranbrook Plan area.

Justification for policy

8.30. The Council receives many applications for householder extensions, alterations, annexes, and outbuildings. These developments help occupiers meet changing needs without moving.

8.31. This policy supports changing housing needs and aligns with the NPPF and PPG on effective land use. It reduces the carbon footprint by reusing existing dwellings and resources, ensuring developments maintain acceptable living standards within communities.

8.32. Residential annexes provide flexible accommodation that can adapt to changing family needs, supporting and caring for family members. Annexes should remain ancillary to the main dwelling, avoiding the creation of separate dwellings. They should not be so large that they undermine their subordinate role or become impractical.

8.33. Extensions, alterations, and outbuildings add diversity and flexibility to the housing stock but must respond positively to the context and character of existing areas. These developments should not lead to an increase in larger dwellings, reducing the availability of smaller housing and creating an imbalance. Extensions and subdivisions should not create additional dwellings in the countryside.

8.34. Permitted development rights allow certain extensions and outbuildings without planning permission if specific conditions are met. This policy addresses those cases that exceed these limitations, where planning permission will be required.

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8.35. Annexes, extensions, alterations, and outbuildings should not cause unacceptable impacts on occupants or neighbours, such as issues with amenity, light, noise, privacy, and visual impacts.

Hostels and houses in multiple occupation

8.36. This policy supports the conversion of existing homes and buildings to hostels and Houses in Multiple Occupation (HMOs) while ensuring they meet specific standards to protect the amenities of occupants and neighbours.

Policy HN08: Hostels and houses in multiple occupation (HMOs)

In circumstances where planning permission is required for the conversion or change of use of existing homes, and buildings in other uses, to shared accommodation including hostels and houses in multiple occupation, permission will be granted where it can be demonstrated that all of the following matters are addressed:

A. **Privacy of existing homes and gardens of neighbours** - must be maintained and ensured for new occupiers. The existing home or building must be capable of conversion without causing harm to the amenities of future occupants, neighbours and the wider area;

B. **Vehicular access or car parking** – both in terms of highway safety or visual, noise or light impact on neighbours. Provision must be made for on-site car parking and cycle storage facilities, unless it can be demonstrated that the site is sustainably located with access to regular public transport or is within an 800-metre walking distance of a defined town centre;

C. **Service provision** – there should be sufficient space for communal areas to accommodate adequate bin storage and collection, and accommodate other ancillary functions for the increased number of residents; and

D. **Living spaces and communal facilities** - are of a good standard and suitable for the intended occupiers, individually and in total

To protect the existing small family housing stock, and to allow for adequate residential space standards in the proposed subdivided dwelling, the subdivision of existing properties of three bedrooms or less will not be permitted.

Applications for Hostels and Houses in Multiple Occupation will need to be supported by evidence on how a good standard of management will be provided.

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The Council will resist the loss of existing hostels and HMOs, unless there is evidence of a lack of demand for this type of accommodation within the settlement, or there is viability and building condition evidence to demonstrate that retention and improvement of the accommodation is not viable or achievable.

This policy applies in the Cranbrook Plan area.

Justification for policy

8.37. HMOs are properties occupied by unrelated individuals sharing basic amenities. This policy ensures conversions to HMOs maintain privacy, provide adequate vehicular access and parking, and include sufficient communal areas. It also requires good living standards and management evidence.

8.38. To protect small family housing, the subdivision of properties with three bedrooms or less is not permitted. The Council will resist the loss of existing HMOs unless there is evidence of a lack of demand or viability issues.

8.39. The policy aligns with the NPPF and addresses the need for low-cost, private rented housing. It ensures HMOs meet planning and licensing requirements, protecting the health, safety, and welfare of tenants.

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Gypsy and traveller sites

8.40. This policy ensures the provision and safeguarding of sites for Gypsies, Travellers, and Travelling Showpeople, addressing their accommodation needs while integrating sites into the community and landscape.

Policy HN09: Gypsy and traveller sites

Proposals for new permanent or transit gypsy, travellers or travelling showpeople sites or extensions of existing sites will need to meet all of the following:

A. To be located inside or adjoining a settlement boundary, or within 15 minutes travel time by safe, walking, cycling or public transport providing access to a range of services including school and health services;

B. To have a site size and have a number of pitches that is appropriate, and not over-large, in relationship to the nearest settlement in the settlement hierarchy and its range of services and infrastructure;

C. To not exceed 15 pitches as a maximum;

D. To be assimilated into the surrounding landscape without significant adverse effect;

E. To have acceptable vehicular access, on site turning, parking and servicing;

F. To be in locations that are not vulnerable to flooding or affected by any other environmental hazards that may affect the residents' health and welfare; and

G. To have access to essential utilities - water supply, sewerage, drainage, waste disposal. Where service connections are needed these need to be readily available on or close to the site.

Preference will be given to the expansion and intensification of existing sites, subject to maximum site threshold of 15 pitches. If expansion or intensification is impractical, then account will be taken of the cumulative impacts of additional sites on the character of the local area and on the local community.

In addition to meeting these requirements, planning applications for gypsy and traveller pitches, or plots for travelling Showpeople, on windfall sites in the countryside outside settlement boundaries must demonstrate:

A. The status of the applicant / intended occupant/s meeting the national definition for gypsy, traveller or travelling showpeople and the pitch or plot will be occupied by at least one person with a strong local connection to East Devon district; and

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B. There is a proven unmet need for new pitches or plots, having regard to the supply of deliverable pitches or plots and their availability to gypsies and travellers or travelling showpeople who have a strong local connection to the district.

Safeguarding sites

Existing authorised sites, sites with planning permission, and allocations for Gypsy and Traveller Use or for Travelling Showpeople use, will be safeguarded for the number of pitches/plots permitted.

If, in exceptional circumstances (such as long-term vacancy and a demonstrable lack of need), changes of use or redevelopment to non-Gypsy/Traveller or Travelling Showperson's accommodation use are permitted, then, if need exists in the District, suitably located and laid out alternative provision must be provided prior to the loss of the existing site or part of thereof.

This policy applies in the Cranbrook Plan area.

Justification for policy

8.41. The Gypsy and Traveller Accommodation Assessment (2024)[45] identifies a need for around 32 permanent pitches for Gypsies and Travellers and a joint protocol for transit needs. No additional plots are needed for Travelling Showpeople, as existing plots at Clyst St Mary are sufficient.

8.42. Fifteen permanent pitches will be provided at the new second community in East Devon, with at least 10 delivered during the plan period. Five pitches will be provided east of the M5 and south of the Exeter-Waterloo line. Fifteen pitches will be provided at the Cobdens and Treasbeare Expansion Areas in Cranbrook.

8.43. National policy requires the assessment of accommodation needs for Gypsies, Travellers, and Travelling Showpeople, setting pitch and plot targets and working with neighbouring authorities. The 2024 GTAA[46] provides detailed evidence of needs,

[45] HOU-009 - East Devon District Gypsy and Traveller Accommodation Assessment (GTAA), https://eastdevon.gov.uk/media/gl0n5qkq/2024-09-30-east-devon-gtaa.pdf

[46] HOU-009 – East Devon Gypsy and Traveller Accommodation Assessment, https://eastdevon.gov.uk/media/gl0n5qkq/2024-09-30-east-devon-gtaa.pdf

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showing existing pitches mainly in western East Devon. Most immediate needs arise from overcrowding and newly formed families on existing sites.

8.44. The GTAA recommends temporary stopping places for transit needs and identifies a need for 20 pitches for households meeting the planning definition, up to 8 pitches for undetermined households, and 4 pitches for households not meeting the planning definition. No additional plots are needed for Travelling Showpeople.

8.45. Planning policy requires identifying and updating a supply of deliverable sites for a 5-year period and developable sites for years 6-10. The Cranbrook sites are expected to meet initial requirements. Existing planning permissions and allocations will contribute to supply, ensuring families can remain locally. An additional site allocation east of the M5 will provide at least 5 pitches.

8.46. The Council does not anticipate a need for specific bricks and mortar housing for Gypsies and Travellers, as general housing provision will meet any such needs. Existing Travelling Showpeople sites, including those at Clyst St Mary, are sufficient to meet needs during this plan period.

Rural housing exception sites

8.47. This policy supports rural exception site housing proposals to provide affordable housing for local communities, ensuring developments are well-related to settlements and meet proven needs.

Strategic Policy HN10: Rural housing exception sites

Rural exception site housing proposals, excluding at Tier 1 and 2 settlements, that are outside of settlement boundaries, will be permitted but must meet all of the following:

A. Be physically well related to the built form of the host settlement. Whilst this does not need to be a settlement with a settlement boundary it must be one that offers a reasonable range of services and facilities;

B. Provide affordable housing meeting a proven, unmet need of the local community, noting that such need may be addressed through local plan allocations. Need can be evidenced by a Housing Needs Survey or other local data such as a Neighbourhood Plan, Parish Survey or Parish Plan. Need is to be based on that existing in the host Parish where the proposal falls but can include need arising from any immediately abutting parish, excluding those falling in Tiers 1 or 2 of local plan policy; and

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C. Be provided for occupiers that have a local connection with the parish or host settlement or where appropriate adjoining Parishes. If occupiers meeting the relevant local connection criteria cannot be found then a cascade approach will be agreed, including accommodating need identified by registered providers, East Devon District Council, Community Land Trusts.

For any development allowed under this policy the dwellings must be retained in perpetuity as affordable and there will need to be evidence to demonstrate that secure arrangements will be in place ensuring the housing will remain available to meet the continuing affordable housing needs of local people.

A small element of market housing may be included on any development, to provide sufficient cross-subsidy to enable the delivery of affordable homes without grant funding. However, at least 66% of dwellings must be affordable dwellings. Where grant funding is available the market housing percentage should be adjusted downward.

This policy applies in the Cranbrook Plan area.

Justification for policy

8.48. Exception sites deliver affordable housing outside development plans, addressing local needs. This policy is crucial in rural areas with affordability issues, supporting the Council Plan's aim to increase affordable housing and aligning with the East Devon Housing Strategy.

8.49. National policy allows a small amount of market housing as a cross-subsidy to enable affordable housing delivery without grant funding. At least 66% of dwellings on exception sites must be affordable, with adjustments if grant funding is available.

8.50. The East Devon Local Housing Needs Assessment 2022[47] provides evidence of the need for affordable housing. Exception sites help meet this need by delivering housing as an exception to other development plan policies.

[47] HOU-002 – Local Housing Needs Assessment - https://eastdevon.gov.uk/media/3724890/east-devon-lhna-final-accessible-160922.pdf

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Housing for rural workers

8.51. This policy supports housing for rural workers outside settlement boundaries, ensuring it meets the needs of rural businesses while minimising environmental impacts.

Policy HN11: Housing for rural workers

Applications for rural workers dwellings outside settlement boundaries will be permitted where they support agricultural, horticultural, forestry or other businesses involved in land based growing or production of goods and all of the following are met:

A. It can be demonstrated that the nature and demands of an existing rural business are such that a full-time worker has an essential need to be permanently resident at or near their place of work so they are available at most times;

B. The need cannot be met within a nearby settlement, or by existing housing at or near the site or through the conversion of a suitable redundant or disused rural building at the site;

C. The size and scale of rural workers dwellings will be commensurate with the needs generated by the holding and its activities and no bigger than 150 sq m (gross internal area) and designed to reflect the location and setting of the proposed site;

D. The development will minimise the visual and environmental impact by locating the dwelling close to existing buildings /dwellings, where practical for its purpose; and

E. The rural enterprise has been established for at least three years, is currently financially sound based on functional and economic tests, and the business has clear prospects of remaining viable.

Account will be taken of the history of the holding, the recent pattern of land use and building and recent disposals of land and property when determining a planning application for housing for rural workers.

Where an agricultural, horticultural, forestry or other rural business is not yet established or the need is unproven, then a temporary dwelling such as a mobile home or caravan, may be permitted for a time limited period of up to three years, until the economic viability of the enterprise is established, subject to:

A. Meeting the criteria of 1a) to 1e) above;

B. A firm intention and ability to develop the enterprise; and

C. The business has realistic prospects of meeting functional and economic tests.

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Permission for a rural worker dwelling will be subject to an occupancy condition to ensure that it cannot be sold on or sublet for general accommodation unrelated to the enterprise. Removal of such a condition will only be permitted where there is clear evidence that there is no need for the condition to remain in place.

Any permission granted will be tied through legal agreement to the business holding.

Extensions to or replacement of agricultural or forestry or rural business-related dwellings will require a reassessment of need, excluding minor works. Temporary or seasonal accommodation requirements to serve rural enterprises will be considered on a case-by-case basis.

This policy applies to all of the Cranbrook Plan Area for those parts that fall outside of Cranbrook Plan Built-up Area Boundaries.

Justification for policy

8.52. Housing need includes new dwellings for rural workers employed in agriculture, forestry, or similar rural enterprises. This policy supports rural businesses while limiting sporadic development in the countryside. Exceptions are justified where a rural worker must be available at most times for the operation of a rural business.

8.53. The policy sets a maximum dwelling size of 150 sq.m, informed by planning precedent in East Devon. This includes internal living space and additional requirements like a boot room or office. Only in exceptional cases will larger dwellings be considered, with evidence required to justify the additional space.

8.54. Applicants must provide robust evidence of functional and economic tests, including a business plan and financial assessment. Temporary dwellings may be permitted for up to three years to establish the viability of a new enterprise. Extensions or replacements of rural business-related dwellings will require a reassessment of need.

8.55. The policy ensures that rural workers' dwellings are tied to the business holding through legal agreements and occupancy conditions. This prevents the dwellings from being sold or sublet for general accommodation unrelated to the enterprise.

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Supporting the Economy and Town Centres



Chapter 9. Supporting the Economy and Town Centres

9.1. Earlier in the plan, we outlined the Economic Vision, Strategy, and Strategic Policy on employment land, addressing strategic priorities, cross-boundary issues, and future employment development. This chapter includes the Strategic Policy on the town centre hierarchy and retail provision.



FIGURE 9 A crowded and vibrant Sidmouth town centre.

9.2. Strategic policies are supported by non-strategic policies for development management and employment-related proposals. For this chapter, 'employment use' includes Use Classes B2, B8, E, C1, F1, F2, and Sui Generis.

Employment development within settlement boundaries

9.3. The local plan promotes larger scale employment development in the West End, while most new development elsewhere will occur within settlement boundaries, focusing on main population centres. This plan includes policies that support employment growth within these boundaries.

Policy SE01: Employment development within settlement boundaries

Within defined settlement boundaries, as shown on the Policies Map, and in the Cranbrook Plan Built-up Area Boundaries, development for employment uses,

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including the intensification of existing employment sites, will be permitted where proposals are compatible with neighbouring developments and land uses and will not give rise to adverse amenity impacts or undermine plan strategy or specific policies directly relevant to the use of the land in question.

On existing employment and business parks, and on land allocated for employment use, uses other the E(g), B2 and B8 (offices, research and development, industrial processes and storage and distribution) will not be permitted unless they can be shown to be subordinate to, directly compatible with and complementary to the overall business use and will enhance job provision and the effective operation and business appeal of the park or site.

This policy applies to all of the Cranbrook Plan area, specifically for all areas that fall inside Cranbrook Plan Built-up Area Boundaries.

Justification for policy

9.4. The policy is essential to ensure a vibrant and resilient economy in East Devon. It aims to meet the future employment needs of the district by providing a range of employment sites, encouraging inward investment, and supporting local job creation.

9.5. The policy addresses the need for employment land within settlement boundaries, supporting self-containment and reflects the settlement hierarchy. It highlights the

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importance of traditional industrial estates and business parks while also promoting high-value employment opportunities.



FIGURE 10 Light industrial units

9.6. New employment sites should meet a specific need as identified in the EDNA[48] or through identified business interest and contribute to sustainable growth. The policy directs office development to town centres and warehousing to suitable locations, ensuring good access to transport networks. It supports the reuse of previously developed land and allows for some flexibility in changes of use within employment sites, while maintaining a mix of employment opportunities.

9.7. The mix of uses within existing employment sites should primarily focus on Use Classes E(g), B2, and B8, with limited other employment uses as appropriate. This ensures a sufficient supply of land and premises to meet evolving business needs.

[48] ECN-001 – Greater Exeter Economic Development Needs Assessment (EDNA), https://eastdevon.gov.uk/media/flflexie/greater-exeter-edna-final-report-combined-v2-0.pdf

Employment development in the countryside

9.8. The policy supports the intensification and extension of existing employment businesses in the countryside, focusing on reusing or adapting existing buildings to minimise new development.

Policy SE02: Employment development in the countryside

Intensification and extension of existing employment businesses in the countryside

Building on land within the existing operational site boundaries of a business for intensification or extension of that business and its works and outputs, will be allowed in the countryside where the business:

A. Is operating in premises that are at or close to full occupancy; or

B. has a proven need arising from new or expanding operational functions.

This policy does not apply at farms or on businesses that operate from or within farm complexes and to be acceptable under plan policy the:

A. Expansion will need to be proportionate to the existing size and scale of site operations; and

B. proposal will need to prioritise reuse or adaptation of existing buildings to reduce the need for additional built development.

Noting these two considerations, extending existing buildings or provision of new buildings will only be acceptable if evidence demonstrates that re-use or adaptation of current buildings is not viable or practical.

Re-use of existing rural buildings

Proposals for small scale employment development through re-use and adaptation of existing redundant rural buildings not currently used or last used for employment, will be permitted where the buildings are:

A. Not in agricultural use or likely to be required for agricultural purposes;

B. Of sound and permanent construction;

C. Capable of adaptation or re-use without major re-building, alteration, or extension; and

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Any development permitted in accordance with this policy should be readily accessible via a range of modes of transport, be socially and environmentally acceptable and be compatible with overall plan strategy and other local plan policy considerations.

This policy applies to all of the Cranbrook Plan area that falls outside of the Cranbrook Plan Built-up Area Boundaries.

Justification for policy

9.9. This policy supports employment growth on existing rural sites while protecting the countryside's character. It balances economic development with environmental sensitivity, ensuring new uses are appropriate in a countryside location, are proportionate and prioritise the reuse of existing structures.

Policy SE03: Farm diversification

Farm diversification will be supported through allowing for the introduction of new employment uses onto established farm holdings (those that have operated for at least 10 years) where the development requires a rural location, is subordinate to and supports the long-term financial viability of the farm. Criteria on what should be considered in the viability statement will be published and available online via the Council's website.

Proposals for farm diversification will need to meet all of the following:

A. The proposal is compatible with, and be an ancillary and subordinate component of, an existing and active farm enterprise and contributes to the continuing viability of the farm as a whole, retaining existing or providing new employment opportunities and services for the local community;

B. Development, in terms of its scale, nature, location and layout, does not detract from or prejudice the existing agricultural undertaking or its future operation;

C. Any existing suitable buildings are re-used or adapted and, where appropriate, redundant buildings which are derelict or offer no opportunity for beneficial use are removed; and

D. Any new building (and parking and other structures/storage) is modest in scale and sited in or adjacent to an existing group of buildings.

This policy applies in the Cranbrook Plan area.

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Justification for policy

9.10. This policy is crucial for supporting rural communities by allowing employment growth on existing sites while protecting the countryside's character. It aims to balance economic development with environmental sensitivity, ensuring that expansions are proportionate and prioritise the reuse of existing structures.

9.11. This policy will be used to guide decisions on rural diversifications, ensuring they are appropriate in scale and do not harm local amenities. The policy also supports the reuse of redundant rural buildings for small-scale employment, provided they are structurally sound and accessible.

9.12. The policy excludes business parks and industrial estates in rural areas, focusing instead on individual businesses. It emphasises the importance of maintaining the rural character and minimising environmental impacts.

9.13. Agriculture underpins the District's rural economy and supports many ancillary businesses. It remains a significant sector for East Devon, providing direct jobs and underpinning other economic activities. The Council recognises the importance of agriculture and the need for new employment in rural areas, making diversification crucial for the economic viability of farm holdings.

9.14. Diversification involves adding non-agricultural business activities within the holding to develop new income sources. This supports farm income, adds stability, and optimises assets. Farmers are increasingly adopting entrepreneurial strategies to face economic pressures and policy changes, moving towards grants and tackling climate change.

9.15. The policy focuses on development appropriate to the existing business and rural character. It prioritises using available buildings on a holding, with new buildings integrated with the existing environment. Diversification proposals should contribute to the farm business and rural economy, avoiding conflicts with existing operations.

9.16. Proposals should align with the future business plan for the holding, ensuring continued viability. Applications should be supported by information by a business plan and long-term viability statement produced in accordance with guidance on the Council's website. New uses must be appropriate, considering their impact on the surrounding area and relationship to agricultural operations. Diversification can include adding value to farm products, tourism, renewable energy, and other innovative activities.

9.17. Exceptionally, residential conversion may be part of a farm diversification project, considering the flexibility already provided by Permitted Development Use Class Q.

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Resisting the loss of Employment sites

9.18. This policy aims to resist the loss of employment sites to other uses, ensuring that land designated or used for employment remains available to support economic growth and local job opportunities.

Strategic Policy SE04: Resisting the loss of employment sites

Loss of employment sites, either in whole or in part, to other uses will not usually be permitted. Employment sites are considered to be those currently in employment use or last used for employment and those which are allocated, permitted or conditioned for employment development.

Exceptionally, those sites in B2 and B8 uses will only be permitted for other types of employment use, if it can be demonstrated that:

A. The alternative use is in accordance with or does not undermine the plan's overall Spatial Strategy; and

B. Development relates to ancillary services of an appropriate size which will support an employment area (not within a town centre) by making it more sustainable and viable; or

C. Development results in mixed use regeneration within a settlement boundary designed to maintain or increase net job opportunities through alternative employment uses; or

D. The site is no longer viable for the current type of employment use but is viable for an alternative type of employment use, evidenced by a compliant viability statement; or

E. There is a lack of demand for the current type of employment use at the site, evidenced by a compliant marketing statement showing that the site has been appropriately marketed; and that a suitable supply of available (actively marketed) comparable employment sites/land can be demonstrated within the local area, evidenced by a compliant supply statement.

Exceptionally, the use of any employment sites for non-employment uses will be permitted if it can be demonstrated that:

A. The alternative use is in accordance with or does not undermine the plan's overall Spatial Strategy; and

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B. The site is no longer viable for any employment use, evidenced by a compliant viability statement.

Compliant viability, marketing and supply statements must adhere to the respective requirements set out in the relevant guidance published and available online via the Council's website.

If an alternative use is acceptable, then applicants will be required to demonstrate that they have endeavoured to incorporate an appropriate (in terms of scale and type) element of employment floor space as part of the new development.

This policy applies in the Cranbrook Plan area.

Justification for policy

9.19. This policy is essential to maintain a sufficient supply of employment land in East Devon, supporting economic growth and local job opportunities. It aims to protect existing and proposed employment sites from being converted to other uses, ensuring they remain available, suitable, and achievable over the plan period.

9.20. This policy will be used to guide decisions on the retention of employment sites, ensuring that any proposed changes align with the overall Spatial Strategy and do not undermine the plan's objectives. The policy allows for exceptions where alternative employment uses or mixed-use regeneration can be justified, provided they support the sustainability and viability of employment areas.

9.21. The policy emphasises the importance of retaining employment land within settlements to support local communities and reduce the need to travel. It also recognises that some ancillary uses may complement and support employment areas.

9.22. As the economy evolves, not all employment areas will remain viable for their current uses. The policy allows for alternative uses if there is no realistic prospect of continued employment use, supported by robust evidence of viability and market demand. If an alternative use is appropriate, incorporating an element of employment provision should be considered.

9.23. This policy aligns with the NPPF, supporting sustainable and inclusive economic growth, and providing flexibility to respond to changing economic circumstances.

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Employment and skills statements

9.24. This policy requires major developments to complete an Employment and Skills plan and provide an Employment and Skills Statement for developments over 100 homes or 5,000 square metres of employment land. These documents aim to maximise local employment and skills opportunities.

Policy SE05: Employment and Skills Statements

All major developments will be required to submit a basic Employment and Skills plan. Any developments over 100 homes or on employment sites of 5,000 square metres or greater will also need to provide an Employment and Skills Statement which commits to maximising the provision of skills and employment opportunities, to benefit the local population as well as the employer. These documents should be submitted with the planning application for development and will be implemented through a planning obligation or condition.

Compliant Employment and Skills Statements must adhere to the respective requirements set out in the relevant guidance published and available online via the Council's website.

This policy applies in the Cranbrook Plan area.

Justification for policy

9.25. This policy is crucial for seeking commitments from development projects to enhance employment and skills within East Devon. It ensures that major developments contribute to local job creation and skills improvement, benefiting both the local population and employers.

9.26. This policy will be used to ensure that Employment and Skills Plans and Statements are submitted with planning applications where required. These statements should outline commitments to local employment and skills provision and will be implemented through planning obligations or conditions. Guidance on these plans and statements will be made available on the Council's website.

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9.27. The policy supports inclusive economic growth by raising skill levels in the district, aligning with broader initiatives like the Levelling Up White Paper[49]. It emphasises the importance of STEM (Science, Technology, Engineering and Mathematics) education, technical qualifications, and employer investment in workforce development.

9.28. Larger developments must commit to Employment and Skills Statements covering all development phases, secured through planning conditions or legal agreements. The Council will work with applicants to ensure these commitments are relevant, measurable, and monitored effectively.

9.29. The policy uses benchmarks from the National Skills Academy's Client Based Approach[50] to guide negotiations with developers, ensuring that employment and skills commitments are proportionate and achievable.

Town centre hierarchy, sequential approach and impact assessment

9.30. This policy establishes the relevance of the hierarchy of town centres in East Devon, prioritising tier one and two centres for main town centre uses. Proposals must align with the scale, design, and function of the centre and comply with other plan policies.

Strategic Policy SE06: Town centre hierarchy

Tier one and two towns form focal points of activity in East Devon towns and will be the preferred location for the development of new retail, leisure and other uses that attract and are used by people for commercial or community activities.

In these town centres new development proposals should be appropriate in terms of their scale and design to the centre in which they are proposed, as well as to the role and function of that centre.

[49] ECN-008 – Levelling Up the United Kingdom, https://eastdevon.gov.uk/media/hjjm23xj/ecn-008-levelling_up_the_united_kingdom__accessible_version_.pdf

[50] ECN-009 – Client-Based Approach, https://eastdevon.gov.uk/media/wggd3bpm/ecn-009-english-client-based-approach-contractor-guidance.pdf

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In tier three and four settlements (without a defined Town Centre Area) new smaller scale retail and commercial developments should be located within central parts of the settlement and readily accessible to pedestrians.

Outside of town centre areas development proposals for retail uses, or other leisure, commercial or communal uses, that attract substantial visitor or user numbers will not be permitted unless they are on land specifically allocated for that use in this plan or are explicitly provided for under other plan policy.

This policy applies in the Cranbrook Plan area.

Justification for policy

9.31. East Devon's town and village centres are community hubs offering retail, leisure, entertainment, sport, recreation, offices, cultural spaces, and tourism. Their vitality supports local communities, and the NPPF promotes competitive town centre environments and growth management. This strategic policy defines the network and hierarchy of centres, ensuring resilience to future economic changes, based on the Council's Role and Functions of Settlements Study[51].

9.32. The hierarchy includes:

- Tier one: Exmouth
- Tier two: Axminster, Cranbrook, Honiton, Ottery St Mary, Seaton, Sidmouth
- Tier three: Broadclyst, Budleigh Salterton, Colyton, Lympstone, Woodbury
- Tier four: Clyst St Mary, Uplyme, Beer, West Hill, Newton Poppleford, Feniton, Whimple, Kilmington, Otterton, East Budleigh, Stoke Canon, Tipton St John, Musbury, Sidbury, Chardstock, Broadhembury, Payhembury, Branscombe, Plymtree, Dunkeswell, Hawkchurch, Exton, Westclyst

9.33. Encouraging new shops and retaining existing ones, especially in rural areas, is crucial. This reduces travel, congestion, emissions, and improves health. The sequential test[52]

[51] GEV-001 – The Role and Functions of Settlements, https://eastdevon.gov.uk/media/q3ndtwjn/gev-001-role-and-function-of-settlements_report_v3-final-draft-for-spc.pdf

[52] ECN-007 – Evaluation of Town Centres and Retail Policy Boundaries Sequential Test, https://eastdevon.gov.uk/media/yxdkdfpo/3a-retail-town-centres-and-sequential-test-topic-paper-appendix-1.pdf

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ensures development is appropriately located, prioritising town centres, then edge-of-centre, and finally out-of-centre sites, provided they are accessible and do not harm nearby centres.

Town centre development

9.34. This policy supports the development of town centres in East Devon, enhancing their role as sustainable shopping and leisure destinations. It aims to improve the quality and range of facilities while maintaining the character and amenity of the centres.

Policy SE07: Town centre development, sequential approach and impact assessment

Town Centre Areas and Primary Shopping Areas are defined for the tier one and two towns (other than Cranbrook) and the settlements of Budleigh Salterton, Beer and Colyton.

Proposals for development within the Town Centre Areas (and excepting Cranbrook which is subject to the policies of the Cranbrook Plan), as defined on the Policies Map, will be permitted where they 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. 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, incorporate provision for cycle access and cycle parking and enhance the natural environment wherever possible.

The Primary Shopping Areas as defined on the Policies Map 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 ground floor units are facilitating retail or leisure uses. Unless it can be demonstrated that there is no longer a retail or leisure demand, other town centre uses will not be permitted on the ground floor within the Primary Shopping Areas. Unless it can be demonstrated that there is no demand for any town centre use residential uses 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 is available online via the Council's website.

Where the 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 Areas 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.

Sequential approach and impact assessment

Outside of town centre areas development proposals for retail uses, or other leisure, commercial or communal uses, that attract substantial visitor or user numbers will not be permitted unless they are on land specifically allocated for that use in this plan or are explicitly provided for under other plan policy - unless:

A. Through sequential testing it can be demonstrated that a site within a Town Centre Area, or failing that on the edge or physically well related to a Town Centre Area, or failing that on an Edge-of-centre[53] site as defined in the NPPF is not available; and

B. For retail proposals with a floorspace of 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 either alone or cumulatively. Neighbourhood Plans may set different thresholds where local considerations, supported by evidence, indicate this is appropriate.

Retail development will not be permitted on sites allocated for other uses if equally suitable alternative provision can be accommodated in the immediate locality.

[53] 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.

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Any out-of-centre sites, which satisfy the sequential test, must be accessible by public transport, bicycle and foot and well-connected to the centre by these modes. 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.

This policy applies to all of the Cranbrook Plan Area, but matters in policy that reference 'Town Centre Areas' and 'Primary Shopping Areas' including through cross references to their depiction on the Policies Map do not apply.

Justification for policy

9.35. East Devon's town centres are compact, focusing on convenience and service provision, with many independent shops and supermarkets. Regular markets and events add vibrancy. Smaller settlements like Budleigh Salterton, Beer, and Colyton also have a range of shops and uses, making this policy applicable to them.

9.36. The policy defines Town Centre Areas and Primary Shopping Areas for tier one and two towns, and Budleigh Salterton, Beer, and Colyton. Development proposals in these areas should enhance retail and leisure facilities, strengthen vitality and viability, and not undermine the shopping character or visual amenity. Proposals should contribute positively to the townscape, include cycle access and parking, and enhance the natural environment.

9.37. Primary Shopping Areas will focus on retail and appropriate leisure uses. Other town centre uses will be permitted only if the majority of ground floor units remain retail or leisure. Residential uses on the ground floor are not permitted unless there is no demand for any town centre use, evidenced by a marketing statement.

9.38. Architecturally or historically significant shopfronts should be retained in new developments. Upper floors in Town Centre Areas are encouraged for residential or community use, provided they are independently accessed and do not impact retail use.

9.39. The policy aligns with the NPPF, supporting town centres as community hubs and defining acceptable uses. It ensures retail concentration in Primary Shopping Areas to maintain High Street vitality. Town Centre Areas and Primary Shopping Areas share the same boundaries on the Policies Map.

9.40. Historic town centres contain listed buildings and conservation areas, requiring sensitive design to protect and enhance their character. This creates attractive centres that encourage regular use and retain local spending.

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9.41. Town centres offer a mix of uses and benefit from public transport. The Local Plan provides a strategy for their development and to support their vitality and viability.

9.42. Town centre and edge-of-centre sites are suitable for specialist housing, including for older people, due to their proximity to transport and services.

9.43. The policy seeks to retain retail units in town centres despite competition from online retailing and changes in use allowed by the General Permitted Development Order (GPDO). It applies to proposals outside the permitted development regime to ensure town centres remain attractive destinations.

9.44. The NPPF requires local plans to set thresholds for retail impact assessments. East Devon has set a 500 square metre threshold for retail and 2,500 square metres for other developments. These assessments should be proportionate and agreed upon early in the planning process.

Local shops and services

9.45. This policy supports the development of new shops and services within tier 1-4 settlements, villages, and neighbourhood centres, ensuring they enhance the local retail or service role and are accessible by walking and cycling. It also aims to resist the loss of existing local shops and services unless they are no longer viable.

Policy SE08: Local shops and services

Provision of new shops or services

Outside of town centres and within village and neighbourhood centres proposals for shopping and service development (including Public Houses and Post Offices) will be supported within tier 1-4 settlements, provided it enhances their retail or service role and is accessible by walking and by bicycle and will not result in excessive traffic generation. New shops should sell predominantly convenience goods, be of a scale to serve the local area without, alone or cumulatively, impacting on the vitality or viability

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of any nearby centre[54].
As a guide, shops in these locations should not exceed 280sqm, mostly sell essential goods, including food and be at least 1km from another similar shop.

Loss of existing local shops or services

Existing retail and service provision within villages should be maintained and potential providers of future retail development within villages will be encouraged to make provision of a scale and nature appropriate to local needs.

Development proposals that would result in the loss of existing local shops and services will be resisted where it would result in the significant or absolute loss of that facility to the community unless it is evidenced that it is no longer viable for the shop or service to be sustained, including under community acquisition/operation or within, or as part of, a different use. Evidence will need to be presented to show that the site has been actively marketed for at least 12 months at a sound, realistic and viable price for commercial uses and that other employment and non-residential uses are not a viable alternerative. Evidence should be outlined in marketing and viability statements, guidance as to what should be considered in these is available online via the Council's website.

Permission to change the use of a shop will be subject to the retention of the shopfront.

The section of this policy that falls under the heading of 'Loss of existing local shops or services' applies to all of the Cranbrook Plan area. The section under 'Provision of new shops or services' does not apply in the Cranbrook Plan Area.

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[54] As a guide to the scale and location of shops in the smaller settlements, Use Class F.2 (of the 1st September 2020 General Permitted Development Order) relates to shops not more than 280sqm mostly selling essential goods, including food and at least 1km from another similar shop.

Justification for policy

9.46. Throughout East Devon, small groups of shops and services are vital for meeting the basic, everyday needs of communities. These range from comprehensive offers in town and village centres to neighbourhood and village shops. The diversity of provision makes it impractical to define all local centres on the Policies Map, but these areas typically supply a range of everyday goods and services. There is potential for improving local centres and providing new shops, post offices, and services in areas lacking retail facilities. Opening hours in residential areas may be restricted to safeguard local amenity.

9.47. Existing shops and services are crucial for day-to-day convenience shopping, especially for the elderly and less mobile. Village public houses and post offices reduce reliance on private cars, particularly where public transport is limited. The Council will resist the loss of local shops and services where it would significantly impact the community.

9.48. Reinstating shops after they have changed to other uses is challenging. Proposals involving the loss of local shops or services will only be permitted if the existing use is no longer viable and there is no market for the business. The Council will seek marketing and financial information to demonstrate this and will aim to retain the shopfront for potential future use. Detailed guidance on the scale and type of evidence that is required to accompany a planning application is available on the council's website.

9.49. Recognising the community role of shops and services is essential for creating sustainable places. This policy aligns with NPPF guidance on retaining and developing accessible local services and community facilities. It takes a cautious approach to the loss of important shops and services, ensuring community needs are met while allowing for change of use when viability can no longer be demonstrated. Proposals must provide evidence of non-viability through marketing information and viability studies.

Rural shops outside of towns and villages

9.50. This policy supports retail development in rural areas outside towns and villages, provided it directly relates to an existing rural business and meets specific criteria to protect town centres and local shops.

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Policy SE09: Rural shops outside of towns and villages

To support local rural businesses, while safeguarding the viability of town centres and local shops, retail development in rural areas outside villages (including extensions or additional facilities) will be permitted if it is directly connected to an existing rural business, such as a farm or plant nursery. This will be subject to:

A. A minimum of 60% of the produce/products for sale being produced on the premises or holding;

B. At least half of the remaining produce/products for sale being sourced and produced from within East Devon; and

C. The remainder of the produce/products for sale being sourced and produced from within Devon, Cornwall, Dorset and Somerset.

and provided that:

A. The scale and type of retail shop proposed will not adversely affect easily accessible convenience shopping available to the local community (and a retail impact assessment may be required to ensure that existing town centres and local shops are not adversely affected to an unacceptable degree);

B. The proposal does not harm the rural character of the surrounding natural or historic environment, or the amenities of the locality;

C. The local road network and access to the site can safely accommodate the extra traffic generated by the proposal; and

D. The car parking will be proportionate to the scale of the development and the layout and siting will be sympathetic to the surroundings.

This policy applies to all of those parts of the Cranbrook Plan area that fall outside of the Cranbrook Plan Built-up Area Boundary.

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Justification for policy

9.51. Rural businesses are those that rely on the land and natural assets of the countryside to derive an income. They are not, for the purposes of this policy, businesses that are simply located in a rural area.

9.52. Rural shops, including farm shops and plant nurseries, are defined as those where the majority of goods sold are produced on the premises or associated land. This ensures a strong link to the land use, preventing them from becoming general retail outlets. Farm

shops provide valuable local facilities and additional income for farms, supporting the rural economy without competing with town and village centres.

9.53. To prevent rural shops from becoming large commercial enterprises, the policy restricts the size and type of goods sold. Additional services, such as cafes, are only permitted if ancillary to the sale of goods produced on the property. This control ensures rural shops do not harm the high-quality East Devon landscape or generate excessive traffic.

9.54. The policy promotes retail development in rural areas where products are locally sourced or manufactured, supporting agricultural diversification and local food production. It restricts the scale of development and the origin of goods to protect the vitality and viability of town centres, ensuring they remain the focus for retail, services, leisure, and public amenities.

9.55. Proposals for new or expanded rural shops must not adversely affect local convenience shopping, the rural character, or local amenities. They must also ensure safe access and proportionate car parking. The policy aligns with the NPPF, promoting sustainable rural retail development while protecting town centres.

Sustainable tourism

9.56. This policy aims to secure a high-quality, sustainable tourism experience in East Devon, benefiting local communities and businesses while conserving the district's natural beauty, wildlife, and cultural heritage.

Policy SE10: Sustainable tourism

The provision of visitor accommodation, facilities and attractions within settlement boundaries will be supported and encouraged where they are of an appropriate scale for the locality and minimise reliance on the private car.

Tourism development in the countryside

Any proposal for new tourist attractions, facilities or temporary accommodation in the open countryside should be to meet an identified and evidenced demand and meet the following criteria in full:

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A. Re-use or adapt any existing suitable buildings and, where appropriate, remove any redundant buildings which are derelict or offer no opportunity for beneficial use. If existing buildings cannot be reused or adapted then this should be fully justified;

B. Where new buildings are justified, they must be of an appropriate scale, siting and appearance and activities must be of an appropriate intensity for the character of the area and not adversely impact local amenity to a significant degree;

C. Not result in significant adverse impacts from vehicle movements or parking and, where it is likely to create significant vehicular movements to and from the site, development should be well located in relation to sustainable tier 1-4 settlements and local public transport provision;

D. Be closely associated with other attractions/established tourism uses, including the public rights of way network; and

E. Be located very close to the main dwelling from which it will be serviced/managed (e.g. as part of a farm diversification scheme) to avoid the need for a permanent new managers dwelling or multiple daily car journeys to manage the site.

New buildings to provide overnight visitor accommodation in the open countryside will not be permitted. Temporary structures such as yurts, glamping pods, towing caravans and tents may be acceptable in appropriate locations but should be capable of being completely removed from the site when not required/out of season.

Loss of Existing Visitor Accommodation

The loss of any visitor accommodation to other uses will only be permitted in exceptional circumstances. For example, converting holiday accommodation into low-cost staff accommodation (rented residential accommodation for local workforce), which will address recruitment challenges for the tourism sector.

Proposals for new Tourist Attractions/Facilities or Accommodation

Proposals for new permanent and temporary visitor accommodation and attractions will need to demonstrate a commitment to:

A. Developing facilities of high quality;

B. Working towards Net Zero;

C. Improving accessibility provision (accessible in terms of providing suitable access to those with physical and non-physical impairments/disability); and

D. Positively contribute to the natural beauty, wildlife and cultural heritage of the District.

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In order to provide such evidence, applicants will be required to submit a Sustainable Tourism Statement outlining their commitment to the above criteria.

In this Policy "visitor accommodation" means serviced tourist accommodation (Class C1 use) and un-serviced tourist accommodation, as well as essential ancillary staff buildings to support the provision of tourism services.

This policy applies in the Cranbrook Plan area.



FIGURE 11 Beer Village Centre

Justification for policy

9.57. Tourism is vital to East Devon's economy, attracting visitors with its unique environment and offering diverse accommodation options. The policy supports sustainable tourism growth, ensuring proposals benefit local communities and businesses while conserving the natural environment.

9.58. Visitor accommodation ranges from hotels and B&Bs to holiday lets, glamping, and caravan sites. The Council supports sustainable attractions and activities that avoid negative impacts like increased traffic and environmental degradation. Proposals should

retain and utilise existing buildings where possible, with new buildings requiring justification and sensitivity to the site.

9.59. The Council will resist the loss of permanent visitor accommodation unless it is financially unviable, requiring evidence through marketing requirements. Redevelopment should prioritise more suitable tourist or community uses, especially in areas like the Coastal Preservation Area.

9.60. The policy promotes 'green tourism,' encouraging proposals that enhance visitors' understanding and enjoyment of East Devon's natural environment. It aims to balance accommodation provision with protecting the rural character, favouring conversions of existing buildings and temporary structures over new permanent buildings.

9.61. Tourism development should be located sustainably within tier 1-4 settlements to minimise car use. Some activities may require rural locations, which should be planned to positively contribute to the natural environment. Sustainable travel options, like bicycle hire, should be included to align with the Council's net-zero targets.

Holiday accommodation parks in designated landscapes

9.62. This policy restricts new holiday accommodation parks in East Devon's most sensitive landscapes, allowing only extensions or ancillary facilities on existing sites under specific conditions to protect the environment and local communities.

Policy SE11: Holiday accommodation parks in designated landscapes

Within the District's most sensitive landscape areas, including National Landscapes , Coastal Preservation Areas and Green Wedges, new caravan, chalet or other holiday parks will not be permitted.

Proposals for the extension of, or related and ancillary facilities on, existing sites will be permitted provided they meet the following criteria in full:

A. No additional permanent pitches or accommodation are to be provided, although upgraded accommodation of a similar size and height will be allowed on the footprint of existing permanent accommodation where this will result in an environmental improvement;

B. The proposal relates sensitively in scale and siting to the surroundings and includes extensive landscaping and visual screening to mitigate against adverse impacts;

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C. The proposal would not have an adverse impact on local character or the amenities of adjoining residents;

D. The proposal would not use the best and most versatile agricultural land;

E. The proposal will be provided with adequate services and utilities;

F. Traffic generated by the proposal can be accommodated safely on the local highway network and safe highway access to the site can be achieved;

G. The proposal will be subject to the provisions of plan policy in terms of sustainable construction, on site renewable energy production and biodiversity net gain; and

H. Any structures beyond the existing boundary of the site are temporary and any visual or other harm can be satisfactorily mitigated.

This policy does not apply in the Cranbrook Plan area.

Justification for policy

9.63. The majority of East Devon lies within designated landscapes. Holiday accommodation parks, including static caravans, chalets, and lodges, are key to the tourism sector and can positively impact the local economy. However, their development must not harm the natural environment or local communities. This policy ensures applications for such developments are carefully managed, particularly given the large scale, range of facilities, lengthy operational hours, and prominent coastal locations of many existing parks.

9.64. Outside designated landscapes, new or expanded holiday parks are acceptable in principle under the Sustainable Tourism policy. Within designated landscapes, no new holiday parks will be permitted. Existing parks are encouraged to upgrade and improve their facilities to reduce visual, environmental, and amenity impacts. Extensions and intensification of existing sites are only allowed for non-permanent ancillary facilities, provided adverse impacts are mitigated.

9.65. This policy balances the economic benefits of holiday accommodation parks with the need to protect East Devon's sensitive landscapes. It ensures that any development is appropriately scaled, sensitively sited, and includes extensive landscaping and visual screening. Proposals must not adversely affect local character, amenities, or agricultural land and must provide adequate services and safe access.

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High Quality Design



Chapter 10. High Quality Design

10.1. The design of spaces and buildings significantly impacts how we experience places and the natural environment. Good design influences health, safety, inclusion, travel choices, cost of living, and quality of life. It also affects the environment through construction methods, local context integration, and addressing climate emergency demands.

10.2. The National Planning Policy Framework (NPPF) emphasises that creating high-quality places and buildings is essential in planning and development. Good design is a key aspect of sustainable development and helps make development acceptable to communities. Local Plan policy ensures well-designed proposals align with the NPPF and national design guidance.

10.3. The Local Plan includes site allocations to meet national housing targets. The design of development at these allocations is crucial to preserving valuable landscapes, especially in sensitive sites like National Landscapes or heritage assets. Design codes will guide future proposals, ensuring new development is resilient and well-integrated into the environment.

10.4. New development should provide a high standard of amenity for users. The quality of a home impacts health outcomes, and suitable size and layout are key. The Government's nationally described space standard (NDSS)[55] sets minimum standards for new dwellings. Local planning authorities may adopt the NDSS through local plan policies, subject to evidence of need and viability.

10.5. Recent evidence shows only 29% of new dwellings in East Devon meet the NDSS for gross internal floor area, with even fewer meeting other NDSS requirements.[56] This may result in inadequate space for daily activities. The impact of adopting the NDSS will be assessed in the viability study accompanying the East Devon Local Plan 2020-40 to ensure the Plan's deliverability.

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[55] HOU-007 - Technical Housing Standards - Nationally Described Space Standards, *Link to EDDC when available*

[56] HOU-008 – Nationally Described Space Standards Evidence, https://eastdevon.gov.uk/media/3724804/lp-2020_40_ndss-evidence1.pdf

Design and local distinctiveness

10.6. This policy ensures new development and refurbishment of existing buildings are of high-quality design and locally distinctive, aligning with local and national design guidance.

Strategic Policy DS01: Design and local distinctiveness

New development, including the refurbishment of existing buildings should be of a high quality design and locally distinctive. Proposals should clearly respond to local policy and guidance including Neighbourhood Plans and Design Guides / Briefs / Codes, whether adopted as Supplementary Planning Documents or promoted through other means. For proposals in the Blackdown Hills National Landscape, reference should be made to the Blackdown Hills AONB Design Guide For Houses; within the East Devon National Landscape, reference should be made to East Devon AONB Planning Guidance. Proposals should also be in accordance with the principles of the National Design Code and Building for a Healthy Life, and any other local design guidance.

The layout and design of building curtilages, roads, parking, pavings, open space, site furniture footpaths and boundary treatments should make a positive contribution to the street scene / public realm and the integration of the development with its surroundings and setting. Recycling and waste storage facilities should be in locations well related to collection points. Particular care will need to be given to boundary treatments that abut public or communal areas in order to avoid adverse impacts.

Proposals will only be permitted where they:

A. Respect the key characteristics and special qualities of the area in which the development is proposed;

B. Ensure the appearance of buildings, including scale, massing, density, height, fenestration, and materials, relate well to their context;

C. Do not adversely affect:

1. The distinctive rural, historic or architectural character of the area;
2. The urban form, in terms of significant street patterns, groups of buildings and open spaces;
3. The amenity of occupiers of adjoining residential properties;
4. The operation of existing uses outside of the proposed development;

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5. The future amenity of occupants of proposed residential properties, with respect to access to open space; protection from noise and pollution; provision of adequate internal light; storage space for bins, bicycles, prams, and other uses; and

D. Meet nationally and locally described space standards[57];

E. Have due regard for important aspects of detail and quality and should incorporate:

1. Attractive, secure layouts with safe and convenient access for the whole community, including disabled users, and incorporating appropriate measures to reduce the potential for crime and antisocial behaviour;
2. Structured layouts to avoid conflicts between different uses;
3. Well-defined, accessible, and overlooked routes for people and vehicles to ensure security;
4. Appropriate lighting to oversee public spaces and reduce crime opportunities;
5. The promotion of ownership and community responsibility by clearly defining public and private areas;
6. Appropriate activity levels to maintain safety and reduce fear of crime at all times;
7. Well-designed security features to support passive, safe design;
8. Necessary and appropriate street lighting and furniture and, subject to negotiation with developers, public art integral to the design;
9. Features that maintain good levels of daylight and sunlight into and between buildings to minimise the need for powered lighting where this does not conflict with shade and tree planting requirements;
10. Appropriate soft landscape (greening) measures and open space provision to enhance amenity and biodiversity value;
11. Measures that minimise risks associated with climate change, including a fabric first approach, the use of appropriate materials, techniques, and technologies to reduce carbon emissions over the lifetime of the development;
12. The mitigation of potential adverse impacts, such as noise, smell, dust, arising from developments, both during and after construction;

[57] Technical housing standards – nationally described space standard - GOV.UK (www.gov.uk)

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13. Measures to secure the management of waste in accordance with the waste hierarchy (reduce, reuse, recycle, recovery, disposal) during the construction and operational phases;

14. A comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.

On any development scheme there is potential for the creation of inert material during any demolition and construction or ground movement or remodelling. Principles of waste reduction and reuse should be considered in the layout, design and levels of any development on all the sites. In development proposals the potential for on-site reuse of inert material will be required to be addressed in development proposal, as this will reduce the generation of waste and subsequent need to export waste off-site for management.

This policy applies to all of the Cranbrook Plan Area but does not supersede any Cranbrook Plan policies.

Justification for policy

10.7. Paragraphs 131 to 141 of the NPPF sets out that planning authorities to create policies for high-quality, beautiful, and sustainable places and buildings. Paragraph 132 highlights the need for clear design visions and expectations to provide applicants with certainty. The NPPF advises local planning authorities to prepare design guides or codes consistent with the National Design Guide58 and National Model Design Code59, reflecting local character and preferences.

10.8. Policy W4 of the Devon Waste Plan 2011-2031 requires the submission of a waste audit statement for all major planning applications to minimise the generation of waste.

10.9. This Council will prepare a District Design Guide to help inform the application of Policy DS01.

[58] HRD-003 – National Design Guide, https://eastdevon.gov.uk/media/45hnoxhb/hrd-003-national-design-guide.pdf

[59] HRD-001 – National Design Code Part 1, https://eastdevon.gov.uk/media/giyl0kst/hrd-001-national-model-design-code-pt1-the-coding-process.pdf

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Housing density and efficient use of land

10.10. This policy ensures residential development optimises site density while conserving or enhancing the area's character and making efficient use of land. Major developments and those in sensitive locations require a design code specifying density recommendations.

Policy DS02: Housing density and efficient use of land

Proposals for residential development should optimise the density of the site in a manner that conserves or enhances the character of the area and makes efficient use of land.

Proposals for major development schemes and those in environmentally or heritage sensitive locations will be required to be supported by a design code agreed with or produced by the council as planning authority. Codes, amongst other matters, may specify density recommendations for key allocations.

This policy does not apply in the Cranbrook Plan area.

Justification for policy

10.11. Paragraphs 123 to 130 of the NPPF focus on making effective use of land and achieving appropriate densities. To meet sustainability goals, it is essential to use land efficiently and build at the highest density compatible with the surrounding area's character. The NPPF (paragraph 129) advocates for minimum density standards in town centres and areas well-served by public transport to significantly increase average residential density. It also suggests setting a range of densities based on the accessibility of different areas.

Advertisements

10.12. This policy ensures that advertisements are appropriately positioned, safe, sympathetic to the area's character, and designed with compatible colours and materials. Illuminated advertisements should reflect the area's general lighting level

Policy DS03: Display of advertisements

Applications for the display of advertisements will be considered in terms of amenity and public safety, taking account of cumulative impacts. Advertisements should be:

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A. Appropriately positioned and scaled in relation to their context;

B. Safe in terms of highway safety;

C. Sympathetic to the character of the area;

D. Designed with colours and materials compatible with the building and area; and

E. Where illuminated, the type and level of illumination should reflect the general level of lighting in the area.

This policy applies in the Cranbrook Plan area.

Justification for policy

10.13. The display of advertisements is controlled similarly to planning permission but under a separate legal system. This policy guides decision-makers on handling advertisement consent applications.

10.14. The NPPF states that poorly sited and designed advertisements can undermine an area's character. Control should focus on amenity and public safety, considering cumulative impacts (paragraph 141). This policy seeks to address these issues.

Incorporating green and blue infrastructure in design and development

10.15. This policy ensures that development in East Devon delivers high-quality, multi-functional Green and Blue Infrastructure in line with Natural England's Green Infrastructure Framework[60].

Policy DS04: Green and blue Infrastructure

Development in East Devon will deliver high quality multi-functional Green and Blue Infrastructure in accordance with Natural England's Green Infrastructure Framework.

All major development proposals must:

[60] ENV-011 - Natural England's Green Infrastructure Framework - https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx [accessed 8th Jan 2025]

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A. Demonstrably meet the 5 Natural England Green Infrastructure Principles[61];

B. Provide a robust Green and Blue Infrastructure Plan which clearly demonstrates how it accords with Natural England's GI Framework and will contribute to nature recovery and restoration of wildlife rich habitats; is integrated with and connects to the surrounding landscape; and provides multi-functional Green Infrastructure which incorporates and enhances natural ecosystems functions including landscape and water quality, biodiversity, food production (including orchards and allotments), increased canopy cover, sustainable drainage and climate change mitigation/adaptation;

C. Enhance and promote the health and wellbeing of residents through the provision of high quality publicly accessible natural green/blue space and connected cycling/walking infrastructure;

D. Enhance existing habitats and provide new wildlife spaces and corridors that enhance biodiversity and provide green links, open space and biodiversity enhancement areas;

E. Maximise beneficial outcomes for residents and visitors to encourage use of the GI network and to enrich the cultural identity of the area;

F. Contribute to the achievement of excellent ecological status of rivers and watercourses, through enhanced natural flood storage, capture of run-off and restoration of soil health; and

G. Clearly demonstrate how proposed Green and Blue Infrastructure will be managed and maintained.

This policy applies in the Cranbrook Plan area.

Justification for policy

10.16. Good quality Green Infrastructure (GI) plays a crucial role in improving health, wellbeing, air quality, nature recovery, and climate resilience, while addressing social inequality and environmental decline. GI is a network of multi-functional green and blue

[61] ENV-010 - Natural England Green Infrastructure Principles (Detailed version, date January 2023) - https://eastdevon.gov.uk/media/4j0herl1/env-012-natural-england-green-infrastructure-principles.pdf

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spaces and natural features that provide a wide range of benefits for nature, climate, communities, and prosperity.

10.17. Development proposals in East Devon should align with the five Benefit Principles of Natural England's Green Infrastructure Principles[62] Wheel:

- Nature Rich Beautiful Places
- Active and Healthy Places
- Thriving and Prosperous Places
- Improved Water Management
- Resilient and Climate Positive Places

10.18. GI should be multifunctional, accessible, connected to its landscape and nature networks, and responsive to local character. It provides opportunities to link with Biodiversity Net Gain, Local Nature Recovery Strategies, Nature Recovery Network, and Natural Capital. GI provision can fully count towards Biodiversity Net Gain delivery. The council will look to produce a standalone Green Infrastructure Design Guide and/or to incorporate Green Infrastructure measures into other design guidance to also help inform implementation of policy.

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[62] ENV-010 – Natural England Green Infrastructure Principles (Detailed Version, date January 2023), https://eastdevon.gov.uk/media/4j0herl1/env-012-natural-england-green-infrastructure-principles.pdf

Sustainable Transport and Communications



Chapter 11. Sustainable Transport and Communications

Introduction

11.1. East Devon is a largely rural district with relatively low levels of walking, cycling, and public transport, and higher car ownership, compared to the national average. While some villages and hamlets rely on car travel, larger settlements offer jobs, facilities, and services accessible by sustainable travel modes.

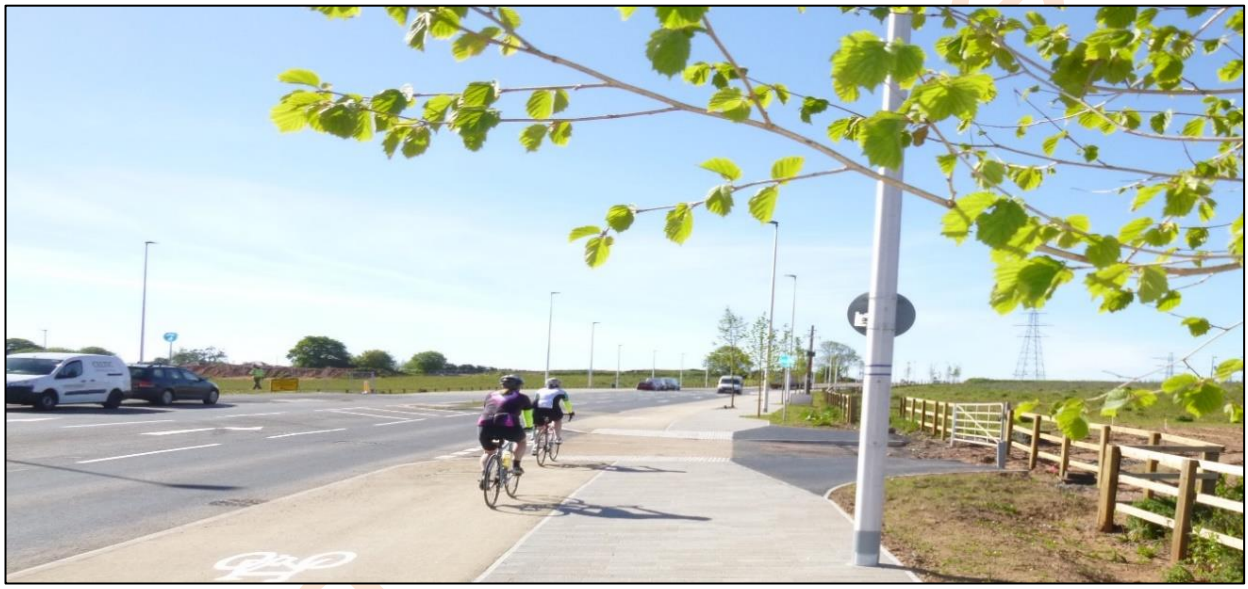


FIGURE 12 New cycle and walkways facilitate sustainable travel.

11.2. The spatial strategy in chapter 3 reflects national policy by focussing significant development at locations which are, or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Promoting sustainable transport in new developments reduces traffic congestion, lowers carbon emissions, improves air quality, and enhances physical and mental health. It also addresses social exclusion for those without car access, such as young people, older people, those with disabilities, and low-income households.

11.3. A range of other plans prepared by partner organisations, principally Devon County Council as the local transport authority, promote sustainable travel – these include

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Local Cycling and Walking Infrastructure Plans[63], Local Transport Plan 4[64], and the Bus Service Improvement Plan[65]. Transport modelling is underway to consider the impact of development across the wider covering East Devon, Exeter, Mid Devon and Teignbridge.

Walking, cycling and public transport

11.4. This policy prioritises walking, wheeling, cycling, and public transport for short local journeys and as part of longer journeys.

Strategic Policy TR01: Prioritising walking, wheeling, cycling, and public transport

Walking, wheeling, cycling and public transport should be the natural first choice for short local journeys, or as part of a longer journey. Walking and cycling routes must be prioritised in new development (specifically including where land is allocated for development) – such routes should be coherent, direct, safe, comfortable and attractive. Where appropriate, cycle paths should be segregated from pedestrians to reduce the potential for conflict (for example, where high usage levels are anticipated). Proposals for walking and cycling routes should be aligned with the Local Transport Plan and, where relevant, the Clyst Valley & New Communities and Countywide Local Cycling and Walking Infrastructure Plans.

New development (specifically including where land is allocated for development) should facilitate access to high quality public transport through its location, layout, and, where necessary, contributions to public transport services and/or facilities (for example, bus services, bus stops, bus priority measures, rail infrastructure). In

[63] TRI-004 - Cycling and Multi-Use Trail Network Strategy, https://eastdevon.gov.uk/media/3ifdkvrm/tri-004-cycle-and-multi-use-strategy.pdf

[64] TRI-008 – Devon and Torbay Local Transport Plan 4, https://www.devon.gov.uk/roads-and-transport/traffic-information/transport-planning/devon-local-transport-plan-4-2025-2040/ [accessed 13th Jan 2025]

[65] TRI-009 – Bus Service Improvement Plan, https://eastdevon.gov.uk/media/dylhidnc/tri-009-bus-service-improvement-plan-2024-v-3-0-june-2024.pdf

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particular, development should be aligned with Devon County Council's Bus Services Improvement Plan.

Where appropriate, development should provide, or otherwise make contributions to, an easy interchange between active and shared transport modes through the delivery of mobility hubs.

Development which would result in the loss or reduce the convenience or attractiveness of an existing or proposed footpath, cycleway or bridleway, will not be permitted unless an acceptable alternative route is provided.

This policy applies in the Cranbrook Plan area.

Justification for policy

11.5. Exmouth, Honiton, Seaton, and Ottery St Mary have bespoke bus services, with several high-frequency routes linking East Devon settlements to Exeter. The district has nine train stations across two lines, with significant usage increases over the past 20 years. High-quality active travel corridors, like the Exe Estuary Trail, are also present.

11.6. Studies suggest that most people prefer to walk if their destination is within 1.6 km (1 mile), typically 800m (0.5 miles).[66] Factors such as topography, surveillance, directness, and attractiveness also influence walking choices. While it is unrealistic to require all new developments in rural East Devon to be within 800m of key services and facilities, this is feasible in larger settlements and developments.

11.7. The National Model Design Code advocates walking and cycling for short local journeys, especially those under five miles. In the South West, 43% of journeys are under two miles,[67] offering significant potential for walking or cycling instead of driving. Wheeling includes people who use wheelchair and mobility scooter users who may not identify with walking.

[66] HCO-002 - Planning for Walking,: https://www.ciht.org.uk/media/4465/planning_for_walking_-_long_-_april_2015.pdf ; HRD-003 - National Design Guide, https://eastdevon.gov.uk/media/45hnoxhb/hrd-003-national-design-guide.pdf

[67] TRI-016 – Region and Rural-Urban Classification, https://www.gov.uk/government/statistical-data-sets/nts99-travel-by-region-and-area-type-of-residence#trip-length

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11.8. Sustainable travel 'mobility hubs' can promote walking, cycling, and public transport by providing facilities like secure cycle storage, bike hire, electric vehicle charging, car sharing spaces, and bus stops in one location. These hubs are ideal for key locations such as train stations, bus stops, and Park and Ride sites.

11.9. East Devon, being predominantly rural, has a substantial public rights of way network that this policy seeks to protect and enhance.

Protecting transport sites and routes

11.10. This policy supports the delivery and protection of sites and routes critical for developing infrastructure to widen transport choice and facilitate large-scale development.

Strategic Policy TR02: Protecting transport sites and routes

The council will support the delivery of sites and routes that are critical in developing infrastructure to widen transport choice and realise opportunities for large scale development. New developments should also seek to aid the delivery of transport routes, particularly those proposed in Local Cycling and Walking Infrastructure Plans, Bus Service Improvement Plans, Local Transport Plans or other relevant strategies, taking into account the needs they generate and also potential that may arise though later developments in adjoining or nearby areas.

The following proposed transport sites and routes will be protected from other development that will preclude their delivery.

Strategic cycle network schemes:

A. Clyst Valley Trail

B. Sidford to Sidbury

C. Cranbrook to Exeter (E3)

Public transport:

A. Railway passing loop(s) as necessary between Honiton and Cranbrook.

B. Bus priority route at A3052/A376 to M5 Junction 30.

Road schemes:

A. Alterations/improvements to Clyst St Mary roundabout (A3052/A376)

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B. Alterations/improvements to A30 Airport Junction

C. The route of Axminster relief road.

This policy applies in the Cranbrook Plan area.

Justification for policy

11.11. The policy identifies and safeguards sites and routes essential for enhancing transport infrastructure and promoting sustainable travel. Protecting these sites and routes from other development that could hinder their implementation aligns with national policy and supports the development of a comprehensive transport network.

11.12. New development should contribute to the delivery of these transport sites and routes, where justified.

Travel plans, transport statements and transport assessments

11.13. This policy requires developments likely to generate significant vehicle movements to be supported by a transport statement or assessment and a travel plan to ensure sustainable travel arrangements.

Policy TR03: Travel plans, transport statements and transport assessments

Where development is likely to generate significant amounts of vehicle movements, planning permission will not be granted unless they are supported by a transport statement or transport assessment, and subsequent travel plan, that identifies measures to secure new sustainable travel arrangements, taking into account:

A. The scale of the development; and

B. The availability of public transport, walking and cycling opportunities; and

C. Proximity to environmental designations; and

D. Cumulative impacts of other development in the area; and

E. Whether there are particular types of impacts that require further evaluation.

This policy applies in the Cranbrook Plan area.

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Justification for policy

11.14. The spatial strategy and policies prioritising sustainable transport aim to limit the need to travel and offer genuine transport choices. However, new developments will still generate car travel, especially in rural East Devon, necessitating policies to address transport network impacts. Congestion is a particular issue in western East Devon and eastern Exeter, affecting peak travel times.

11.15. National policy states that developments generating significant movement should provide a travel plan and be supported by a transport statement or assessment to evaluate likely impacts. Travel plans are long-term management strategies that integrate sustainable travel into the planning process; whilst transport assessments thoroughl assess the transport implications of development, and transport statements offer a lighter-touch approach for limited impacts.

Parking standards

11.16. This policy sets minimum parking standards for new residential and employment developments, considering car and cycle parking requirements to promote sustainable transport and reduce emissions.

Policy TR04: Parking standards

Residential car parking standards

Parking in new residential development should provide the following minimum parking provision, unless evidence shows that a different provision is more appropriate based on public transport accessibility, the nature of occupants of dwellings or presence of locally available off-road car parking provision.

Type/Use	Car Parking Requirements	Cycle Parking Requirements (Secure and Undercover)
Residential Dwelling	Average of 1.7 spaces per dwelling (rounded up to the nearest whole number in individual applications).	1 space per Bedroom

Car parking spaces must be of an adequate size to accommodate vehicle parking and have sufficient width to the sides for pedestrian access and egress of vehicles taking

account of the location of the parking space and whether or not spaces also serve as access to a property and whether there are adjacent obstructions.

Garage spaces will not count toward the overall quantum of car parking spaces.

Employment and other development parking standards

Car parking provision to serve new employment and other developments should meet the standards set out below, unless it is demonstrated through robust assessment that alternative levels are more desirable and appropriate.

Type/Use	Car Parking	Short Stay Cycle Parking (obvious, easily accessed and close to destination)	Long Stay Cycle Parking (secure and ideally covered)
Class B2/E(g)	1 per 30 sqm	1 per 1,000m^2	1 per 500m^2
Class B8	1 per 200 sqm	1 per 1,000m^2	1 per 500m^2
Class E(a) Non-food retail and general retail	1 per 20 sqm	1 per 6 staff	1per 200 sqm
Class E(a) supermarket/ Food retail	1 per 14 sqm	1 per 6 staff	1 per 200 sqm
Class E(b)/ Sui Generis Hot food takeaways (including drive throughs)	1 per 25 sqm	2 per establishment	1 per 8 staff
Class C1	1 per bedroom	1 space per 10 bedrooms	1 space per 10 staff

All new parking provision must provide provision of charging points to charge electric vehicles and electric bikes.

The section of this policy that falls under the heading of 'Residential car parking standards' does not apply in the Cranbrook Plan area. The section under 'Employment and other development parking standards' does apply in the Cranbrook Plan Area.

Justification for policy

11.17. The National Planning Policy Framework (NPPF) outlines five key issues for setting local parking standards: accessibility, development type and mix, public transport availability, local car ownership levels, and the need for charging spaces for ultra-low emission vehicles. Given East Devon's rural nature and higher-than-average car ownership, these standards ensure adequate parking while promoting cycling and reducing emissions. Garages are rarely used for car storage and so will not be counted as part of the required car parking provision.

11.18. New residential developments should provide bicycle parking to encourage cycling. In 2019, surface transport emissions accounted for over one-fifth of the UK's total greenhouse gas emissions, with cars and vans contributing 77.9%[68].

11.19. In East Devon, road transport emissions were over one-third of the district's total CO2 emissions. The government mandates increasing production of zero-emission vehicles, aiming for 80% of new cars and 70% of new vans to be zero-emission by 2030, reaching 100% by 2035[69]. East Devon District Council (EDDC) supports this transition through electric vehicle infrastructure and smarter choices.

11.20. For residential parking, the parking figures are based on guidance from the Department for Communities and Local Government (DCLG) and local car ownership data from the 2021 census, resulting in a minimum standard of 1.7 parking spaces per dwelling. In town centres with access to public car parks or on-street parking, lower levels may suffice. In areas with excellent public transport links, car parking spaces may not be necessary.

11.21. New employment developments should adhere to the outlined parking standards. Applications proposing different levels must be justified by robust evidence in a

[68] CCF-015 - The Sixth Carbon Budget Surface Transport, https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Surface-transport.pdf [accessed 10th Jan 2025]

[69] TRI-006 - Zero Emission Vehicle (ZEV) Mandate Consultation, https://www.gov.uk/government/consultations/a-zero-emission-vehicle-zev-mandate-and-co2-emissions-regulation-for-new-cars-and-vans-in-the-uk/outcome/zero-emission-vehicle-zev-mandate-consultation-summary-of-responses-and-joint-government-response [accessed 9th Jan 2025]

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Transport Assessment, Transport Statement, or Travel Plan, considering local circumstances.

11.22. All new developments must provide Electric Vehicle (EV) charging points in accordance with the Building Regulations 2010[70] and relevant government guidance, including the Devon Electric Vehicle Charging Strategy[71].

Aerodromes and safeguarding

11.23. This policy ensures that developments within aerodrome safeguarded areas and Public Safety Zones do not compromise the safe operation of protected aerodromes or public safety.

Policy TR05: Aerodrome safeguarded areas and Public Safety Zones

Within aerodrome safeguarded areas and the Public Safety Zones for Exeter Airport, planning permission will not be granted for development that would prejudice the safe operation of protected aerodromes or give rise to public safety concerns.

There is a general presumption against new or replacement development or changes of use of existing buildings within Public Safety Zones. In particular, no new or replacement dwellings, mobile homes, caravan sites or other residential buildings will be permitted within a Public Safety Zone. Other forms of development will be acceptable, provided they do not reasonably expect to increase the number of people living, working or congregating in the area.

Development that could have an adverse impact on the operation or safety or navigational systems at the Airport will not be permitted unless they provide suitable mitigation to address adverse impacts arising (for example, funding for system upgrades).

This policy applies in the Cranbrook Plan area.

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[70] TRI-005 - Approved Document S: infrastructure for charging electric vehicles: https://eastdevon.gov.uk/media/ol4el1k1/tri-005-approved-document-s-infrastructure-and-charging-of-evs.pdf

[71] TRI-003 - Devon Electric Vehicle Charging Strategy: https://eastdevon.gov.uk/media/tcyobx4i/tri-002-devon-electric-vehicle-charging-strategy.pdf

Justification for policy

11.24. The Civil Aviation Authority has identified safeguarded areas around Exeter Airport and Dunkeswell Airport, as well as a MoD facility in Mid Devon affecting the northern part of the plan area. The Council will consult with the Civil Aviation Authority and airport operators on planning applications that could impact airfield operation and safety, following ODPM Circular 1/2003. This includes developments with high structures, those that may interfere with radio signals, or create bird strike hazards.

11.25. Public Safety Zones have been identified by the Department for Transport on land adjoining the runways to Exeter International Airport. A Public Safety Zone is an area within which the annual risk of fatality to a permanent present individual due to an aircraft accident is not less than 1 in 100,000. Within this area there is a smaller zone, where the individual fatality risk is 1 in 10,000.

Communications

11.26. The NPPF guides local authorities to facilitate the development of a high-quality communications infrastructure in support of economic growth and social well-being. The NPPF makes clear that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technologies (such as 5G). Further, the NPPF sets out how these policies should be balanced with other considerations, including conserving and enhancing both the natural and historic environment.

Digital connectivity

11.27. East Devon faces challenges in delivering communications infrastructure in a rural area. East Devon is part of the Connecting Devon and Somerset (CDS) programme. CDS comes under the Government's Superfast Broadband Programme to deliver next-generation broadband infrastructure to areas where the commercial market has failed to invest.

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11.28. According to Ofcom, in 2024 92.53%[72] of the addresses in East Devon have super-fast broadband coverage and 66.05%[73] have ultra-fast broadband coverage, in comparison the mean for all English district local authorities are 96.61% and 73.24%. This policy ensures that major developments have access to superfast broadband and high-quality communications infrastructure, supporting economic growth and social well-being.

Policy TR06: Digital connectivity

Planning permission for major developments, that will be used or occupied by people, will not be granted unless the scheme will have access to terrestrial or satellite superfast broadband and high-quality communications.

All new ducting to serve new developments must be installed with capacity for more than one provider and other provisions to enable the delivery of multi-operator fibre to the premises and sufficient mobile connectivity.

Developers are encouraged to have early discussions with strategic providers or Connecting Devon and Cornwall for major development and East Devon District Council will continue to support the expansion of full-fibre broadband connections in the district.

This policy applies in the Cranbrook Plan area.

Justification for policy

11.29. Paragraph 118 of the NPPF advises that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.

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[72] TRI-010 - Percentage of addresses with superfast broadband availability in East Devon, 2024: https://eastdevon.gov.uk/media/cxbfh23j/tri-008-lg-inform-superfast-broadband-availability-in-east-devon.pdf

[73] TRI-011 - Percentage of addresses with ultrafast broadband availability in East Devon, 2024: https://eastdevon.gov.uk/media/l1iosvlp/tri-009-lg-inform-ultrafast-broadband-availability-in-east-devon.pdf

11.30. The Building etc. (Amendment) (England) (No. 2) Regulations 2022[74] came into force on 26 December 2022. These regulations introduce gigabit broadband infrastructure and connectivity requirements for the construction of new homes in England.

11.31. East Devon District Council would support further digital connectivity and high-quality communications improvements in the district by liaising with delivery partners and operators in the area and supporting the community engagement of their programmes.

Wireless connectivity and telecoms infrastructure

11.32. Fast and reliable wireless connectivity and telecoms infrastructure are essential for supporting smart technology in homes, workplaces, and travel. Businesses depend on robust communications infrastructure to connect with customers, suppliers, and employees, ensuring efficient operations. This infrastructure includes masts, antennas, ground-based cabinets, and compounds.

Policy TR07: Wireless connectivity and telecoms infrastructure

Proposals for wireless connectivity and telecoms infrastructure will only be permitted where they accord with the principles of good practice for wireless network development, including, but not limited to:

A. Site sharing and use of existing infrastructure or buildings to accommodate new development;

B. Consultation with the local planning authority, local communities and other stakeholders;

C. Considered siting and design, avoiding harm to landscape character, heritage, environment, and bio-diversity; and

D. Compliance with guidance laid out in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) public exposure levels guidance.

Proposals within National Landscapes or at sensitive locations must provide a Landscape and Visual Impact Assessment and, where in the vicinity of a heritage asset as Heritage Impact Assessment.

[74] TRI-012 - The building etc. (Amendment) (England) Regulations 2022: https://www.legislation.gov.uk/uksi/2022/603/contents/made [accessed 13th Jan 2025]

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A condition will be imposed on any permission granted to ensure the removal of equipment, supporting apparatus, and the restoration of the site to its former condition, or to a standard to be agreed with the Authority, as soon as reasonably practicable after it is no longer required for electronic communications purposes.

Where appropriate, future permitted development rights will be restricted by condition to prevent harm to landscape character, heritage, environment, and bio-diversity.

This policy applies in the Cranbrook Plan area.

Justification for policy

11.33. The National Planning Policy Framework (NPPF) highlights the importance of advanced, high-quality, and reliable communications infrastructure for economic growth and social well-being. The Future Telecoms Infrastructure Review (FTIR)[75] and the National Infrastructure Strategy[76] outline the government's strategy for achieving digital connectivity targets and delivering high-quality infrastructure across the UK.

11.34. The Code of Practice for Wireless Network Development in England (2022)[77] guides the provision of telecoms infrastructure, covering all forms of wireless development, including masts and cabinets. This Code was developed by the Department for Digital, Culture, Media and Sport (DCMS) in collaboration with industry representatives, government departments, local planning authorities, and protected landscape bodies.

11.35. Proposals for wireless connectivity and telecoms infrastructure must adhere to the principles of good practice, including site sharing, consultation with stakeholders, considered siting and design, and compliance with International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines. Proposals in National Landscapes or

[75] TRI-013 – Future Telecoms Infrastructure Review, https://eastdevon.gov.uk/media/pqwjpgx5/tri-011-future-telecoms-infrastructure-review.pdf

[76] TRI-014 - National Infrastructure Strategy, https://eastdevon.gov.uk/media/ttifukxq/tri-012-national-infrastructure-strategy.pdf

[77] TRI-015 - Code of practice for wireless network development in England, 2022: https://eastdevon.gov.uk/media/pqrhlkem/tri-013-code-of-practice-for-wireless-network-development-in-england.pdf

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sensitive locations require a Landscape and Visual Impact Assessment and, if near heritage assets, a Heritage Impact Assessment.

11.36. Conditions will be imposed to ensure the removal of equipment and site restoration once it is no longer needed for electronic communications. Future permitted development rights may be restricted to prevent harm to landscape character, heritage, environment, and biodiversity.

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Our Outstanding Landscape



Chapter 12. Our Outstanding Landscape

12.1. East Devon has a beautiful natural environment, which makes the District an attractive place to live and work. This environment also attracts visitors who contribute to the local economy.



FIGURE 13 East Devon's outstanding landscape

Landscape features

12.2. This policy protects East Devon's landscape, countryside, and rural areas from harmful development. Development is permitted only if a proportionate Landscape Appraisal demonstrates it will protect and enhance valued landscape attributes and special features.

Strategic Policy OL01: Landscape features

East Devon's landscape, countryside and rural areas will be protected against harmful development. Development will only be permitted where the applicant is able to demonstrate through a proportionate Landscape Appraisal that it will protect and enhance valued landscape attributes and special features and qualities that contribute

to the character of East Devon's landscapes, in particular where it would not harm the distinctive landscape, amenity and environmental qualities within which it is located, including:

A. Land form and patterns of settlement;

B. Important natural and manmade features which contribute to the local landscape character, including topography, traditional field boundaries, trees and woodlands, areas of importance for nature conservation and rural buildings;

C. The adverse disruption of a view from a public place which forms part of the distinctive character of the area or otherwise causes significant visual intrusions; and

D. Aesthetic and perceptual factors such as tranquillity, wildness and dark skies.

All development in the countryside should have regard to the most up to date Landscape Characterisation Assessments as a basis for understanding, maintaining and enhancing local distinctiveness and landscape character as well as up to date strategy and guidance for trees and woodlands.

This policy applies in the Cranbrook Plan area.

Justification for policy

12.3. This overarching policy aims to protect important landscape features, whether designated or not. A key objective of the Local Plan is to conserve and enhance the environment, landscape, historic character, archaeological value, wildlife, agricultural, recreational, and natural resource value of countryside areas. All development in the countryside should consider the District Landscape Characterisation Assessment (LCA)[78] and the Council's Tree Strategy[79] to maintain and enhance local distinctiveness and landscape character.

[78] ENV-002 – East Devon and Blackdown Hills Landscape Character Assessment, https://eastdevon.gov.uk/media/nr3lkwr3/env-004-east-devon-and-blackdown-hills-landscape-charachter-assessment.pdf

[79] ENV-008 – Tree, Hedge & Woodland Strategy for East Devon 2024-2034, https://eastdevon.gov.uk/media/41ef4fiw/eddc_treewoodlandhedgerowstrategy_v1-4.pdf

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12.4. East Devon's landscape includes deep valleys, wooded hills, ancient woodlands, historic parkland, low-lying farmland, riverside meadows, and various urban forms. The district is rich in biodiversity, with international, national, and locally protected sites and habitats forming part of a wider ecological network. Maintaining sustainable agricultural land and practices is crucial for preserving the district's rural character and landscape.

12.5. Proposals should be accompanied by a proportionate Landscape Appraisal, conducted in accordance with the Guidelines for Landscape and Visual Impact Assessment[80] and successor documents. The level of detail required will depend upon the scale and type of development, the likely impact and the characteristics of the landscape within which it is located. If a full Environmental Impact Assessment (EIA) is required, a Landscape and Visual Impact Assessment (LVIA) by a Chartered Landscape Architect will be necessary.

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[80] Guidelines for Landscape and Visual Impact Assessment 3rd Edition, 2013 (Landscape Institute & IEMA)

National Landscapes

12.6. This policy ensures the highest level of protection for the landscape and scenic beauty of National Landscapes (NLs) in East Devon, including the Heritage Coast.

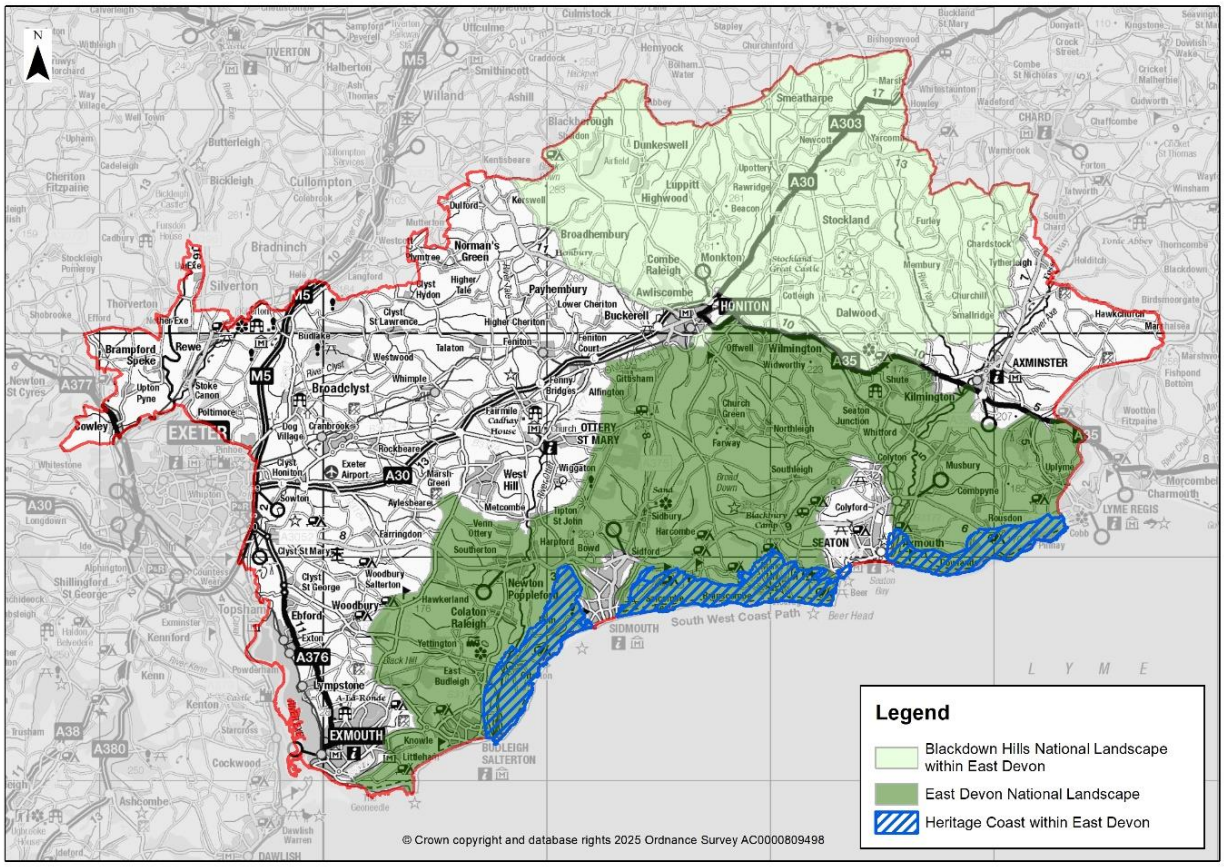


FIGURE 14 East Devon has significant National Landscapes (formerly AONB's) and Heritage Coast.

Strategic Policy OL02: National Landscapes (Areas of Outstanding Natural Beauty)

The highest level of protection will be given to the landscape and scenic beauty of the National Landscapes (NL's) in East Devon:

A. Development in a NL, or outside but affecting its setting or appearance, will only be permitted where it avoids harm and contributes to the protection, conservation and enhancement of the special qualities, character and natural beauty of the NL (including the coastline, where relevant);;

B. Major development in a NL will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest; and

C. Any relevant National Landscape Management Plans will be a material consideration in decision making.

This policy will also apply to the Heritage Coast.

This policy applies in the Cranbrook Plan area.

Justification for policy

12.7. National Landscapes (NLs), formerly Areas of Outstanding Natural Beauty (AONBs), cover around two-thirds of East Devon, including several villages and Budleigh Salterton. The district contains two NLs: the East Devon NL in the south and the Blackdown Hills NL in the north, which extends into neighbouring Mid Devon and Somerset. A small part of the Dorset NL also extends into the east of the district. These areas have the highest level of landscape protection in England, equivalent to National Parks, and are designated by the Secretary of State, meaning their boundaries and statutory protection cannot be altered through the local plan process.

12.8. This policy is necessary to ensure the protection and conservation of East Devon's NLs in accordance with the Countryside and Rights of Way Act 2000 (CROW Act)[81], the Levelling Up and Regeneration Act 2023[82], and the National Planning Policy Framework (NPPF). The Council has a duty to 'seek to further' the statutory purposes of Protected Landscapes and recognise these in reaching decisions and undertaking activities that impact these areas.

12.9. Heritage Coasts (as distinct from Coastal Preservation Areas or the Jurassic Coast) were defined by Natural England and the relevant maritime local authorities to conserve the best stretches of undeveloped coast in England. In East Devon the Heritage Coast lies within the National Landscape and the same policy considerations will apply to both areas.

[81] ENV-015 – Countryside Right of Way (CROW) Act 2000, https://www.legislation.gov.uk/ukpga/2000/37/contents [accessed 15th Jan 2025]

[82] ENV-016 – Levelling Up and Regeneration Act (LURA) 2023. https://www.legislation.gov.uk/ukpga/2023/55/contents [accessed 15th Jan 2025]

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Coastal Preservation Areas

12.10. This policy designates land around the coast and estuaries of East Devon as a Coastal Preservation Area, protecting its undeveloped and open status while supporting appropriate proposals that improve public access to the coast.

Strategic Policy OL03: 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. Development or any change of use in the defined area will not be allowed if it would damage the undeveloped/open status of the designated area or where visually connected to any adjoining areas.

The Coastal Preservation Area is defined on the basis of visual openness and views to and from the sea or estuaries. Proposals which in improve public access to the coast will be supported where appropriate.

This policy does not apply in the Cranbrook Plan area.Justification for policy

12.11. The National Planning Policy Framework (NPPF) requires local authorities to maintain the character of the undeveloped coast while improving public access where appropriate. This policy protects the character of the undeveloped coast, including the WHS, and designates a Coastal Preservation Area based on a detailed character assessment of visual openness and views to and from the sea.

Areas of Strategic Visual Importance

12.12. This policy ensures that development proposals preserve the visual integrity, identity, and scenic quality of East Devon by conserving and enhancing key views and landmarks.

Policy OL04: Areas of strategic visual importance

Development proposals will only be permitted where they preserve the visual integrity, identity and scenic quality of the district, in particular by conserving and enhancing key views and views of local landmarks, including those identified in Neighbourhood Plans.

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The following view types are considered to be particularly important:

A. Landmark views to and from viewpoints and tourism and recreational destinations, including the coast, woodland and open countryside;

B. Views from publicly accessible areas which are within, to or from settlements which contribute to the viewers' enjoyment of the local area;

C. Views from public rights of way and other publicly accessible areas;

D. Night-time views of dark skies, particularly where lighting is to be introduced in areas of low existing light pollution; and

E. Views which include or otherwise relate to specific features relevant to East Devon and its special qualities, such as key landmarks, heritage assets (either in view or the view from) and biodiversity features.

Development proposals should conserve and enhance sequential views, and not result in adverse cumulative impacts within views.

This policy applies in the Cranbrook Plan area.

Justification for policy

12.13. The policy aims to protect important views and landmarks, encouraging the conservation and enhancement of key view types and patterns. It ensures development does not detract from the visual integrity, identity, and scenic quality characteristic of East Devon. Site-based assessments should follow the latest guidelines for Landscape and Visual Impact Assessment (LVIA) [83] and be proportionate to the scheme's size and impact. If an LVIA is not required, a simple landscape assessment may suffice.

12.14. Sources of information for assessments include the East Devon and Blackdown Hills Landscape Character Assessment (2019)[84], What Makes a View (Blackdown Hills AONB, 2013)[85], the Devon historic environment record[86], Village Design Statements,

[83] Guidelines for Landscape and Visual Impact Assessment 3rd Edition, 2013 (Landscape Institute & IEMA)

[84] ENV-002 - East Devon and Blackdown Hills Landscape Character Assessment, https://eastdevon.gov.uk/media/nr3lkwr3/env-004-east-devon-and-blackdown-hills-landscape-charachter-assessment.pdf

[85] ENV-003 - What makes a view? https://eastdevon.gov.uk/media/5gdpc1hk/env-005-what-makes-a-view.pdf

[86] ENV-017 - Devon Historic Environment Record, https://www.devon.gov.uk/historicenvironment/the-devon-historic-environment-record/ [accessed 14th Jan 2025]

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Conservation Area Character Appraisals and Management Plans, Local Landscape Character Assessments, and Neighbourhood Plans. These should inform development proposals and be provided early in the planning process.

Green wedges

12.15. This policy restricts development within green wedges to prevent settlement coalescence and maintain the individual character and identity of settlements.

Policy OL05: Green wedges

Within green wedges, as defined on the Policies Map, development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.

This policy does not apply in the Cranbrook Plan area.Justification for policy

12.16. Green wedges are a long-standing local landscape designation that maintains open green networks between settlements to prevent coalescence and preserve local identity. New buildings within green wedges are restricted to ensure the openness, role, and function of these landscapes are not adversely affected. Proposals for new buildings must be proportionate in size and scale to their intended use and evidence may be required to justify new or larger building

12.17. Essential infrastructure, such as sewage or water connections, power sources, waste water recycling/treatment sites, electricity substations, new roads, emergency services, or telecommunications, is permitted if necessary for connection purposes and if benefits outweigh the impact on the designation. Buildings for outdoor sport and recreation, cemeteries with ancillary buildings, and allotments are acceptable in principle, judged on a site-by-site basis.

The Council supports new buildings for community use, including educational facilities, if a green wedge location is justified.

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Land of Local Amenity Importance and Local Green Space

12.18. The policies in this plan provide important protection to the natural environment within East Devon and are likely to help preserve the character and integrity of important green areas within and around the District. However, there is potential for development pressure to erode and impact upon smaller green areas which are particularly important to local communities. This policy seeks to give added protection against development to specific locally valued green areas or open spaces, including those which are identified during the period of this Local Plan.

Policy OL06: Land of Local Amenity Importance and Local Green Space

This policy will apply to Local Green Spaces, designated through Neighbourhood Plans (and identified on maps in those documents), and to the established Land of Local Amenity Importance areas (as shown on the Policies Map).

Within the Local Green Space or Land of Local Amenity Importance areas, development will be restricted to those limited types of appropriate development set out below, unless very special circumstances can be demonstrated.

Appropriate development, compatible with the reasons for which the land was designated, is considered to be:

A. Buildings for agriculture and forestry;

B. Provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries and allotments, provided they do not conflict with the purpose of the LGS/LLAI designation;

C. The extension or alteration of a building provided that it does not result in a disproportionate addition over and above the size of the original building; and

D. The replacement of a building, provided the new building is for a community use and not materially larger than the one it replaces.

All development proposals should be carefully designed and managed to minimise visual impact, respect the reasons for which the site was designated, and ensure the continued integrity of the site.

Development proposals outside LLAI or LGS, but conspicuous when viewed from it, should minimise any detrimental impacts to the visual amenity and respect reasons for which the site was designated. Development proposals which improve accessibility to,

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or enhance the use of LLAI/LGS will be supported. This policy applies in the Cranbrook Plan area.

Justification for policy

12.19. The Land of Local Amenity Importance designation will convey protection separate to (and in some cases in addition to) the Local Green Space designation which some East Devon communities have identified (and will identify) through Neighbourhood Plans.

12.20. Land of Local Amenity Importance is a long-standing designation recognising a number of specific small parcels of land highly valued by local communities. The Local Plan recognises the particular visual, and other, importance of 14 sites within 5 of the District's towns and restricts development that is not for a community purpose or that would undermine the open character of the area. The sites are deemed to be locally significant, with opportunities of enhancement to provide multiple benefits, including improved water quality, access, biodiversity, recreational, health and educational benefits.

12.21. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. It is envisaged that communities will use this designation to formally protect such areas in future, rather than identifying additional Land of Local Amenity Importance. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. As outlined in national policy, Local Green Space designation should only be used where the green space is in reasonably close proximity to the community it serves; demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of wildlife; and local in character and is not an extensive tract of land.

12.22. As additional Local Green Spaces may be identified during the life of the Local Plan it is not possible to identify these areas on the Policies Map, but the policy will apply to LGS in made Neighbourhood Plans.

12.23. Development within, or in close proximity to the Local Green Space or Land of Local Amenity Importance, should respect reasons for which the site was designed and minimise any impacts on it.

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Contaminated land

12.24. This policy requires a contaminated land assessment for development sites where contamination is anticipated, ensuring safe remediation and mitigation.

Policy OL07: Contaminated land

Where it is anticipated that contamination may be present on or near to a development site, planning applications should be supported by a proportionate contaminated land assessment. The assessment must:

A. Identify and characterise the contamination;

B. Identify the risks; and

C. Identify remediation and/or mitigation measures if required.

Where identified as necessary, agreed measures must be taken to remediate the site prior to or during development. Ongoing monitoring may also be required.

Development on or in close proximity to active or former waste sites will only be permitted where it can be demonstrated that there will be no harm to future occupiers of the site from leachate or landfill gas or other waste arising.

This policy applies in the Cranbrook Plan area.

Justification for policy

12.25. East Devon has a limited amount of contaminated land, but safe decontamination is essential. Remediating and mitigating contaminated or unstable land enhances the local environment. Applications must demonstrate site suitability, considering ground conditions, hazards, and remediation proposals. After remediation, land must not be classified as contaminated under the Environmental Protection Act 1990.[87]

[87] ENV-018 – Environmental Protection Act 1990, https://www.legislation.gov.uk/ukpga/1990/43/contents [accessed 14th Jan 2025]

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Potentially hazardous developments and notifiable installations

12.26. This policy ensures that development within notified consultation zones around hazardous installations poses no health and safety risks.

Policy OL08: Potentially hazardous developments and notifiable installations

Proposals for development within a notified consultation zone around a hazardous installation will be permitted only if there is no health and safety risk to that development or occupants, users or the development or to surrounding areas.

This policy applies in the Cranbrook Plan area.

Justification for policy

12.27. Certain sites and pipelines are designated as notifiable installations due to hazardous substances. East Devon contains high-pressure gas pipelines and other hazardous sites. While these are regulated under health and safety legislation, controlling development near these zones is prudent. The Health and Safety Executive hold records of affected areas and advise on consultation distances. Consent for hazardous substance-related development will not be granted if it increases health and safety risks.

Control of pollution

12.28. This policy prevents development that would result in unmitigated pollution, protecting the environment and public health.

Policy OL09: Control of pollution

Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include:

A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot;

B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;

2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;

C. Noise and/or vibration;

D. Light intrusion, where light overspill from street lights or floodlights on to areas not intended to be lit, particularly in areas of open countryside and areas of nature conservation value;

E. Fly nuisance;

F. Pollution of sites of wildlife value, especially European designated sites or species;

G. Odour.

Where there is an identified risk of pollution, new development should be accompanied by a construction environment management plan (CEMP) to include details of protection, mitigation and enhancement measures, including SuDS and how soil will be managed during construction to avoid compaction and sediment laden run-off.

This policy applies in the Cranbrook Plan area.

Justification for policy

12.29. Pollution significantly impacts health and quality of life. Development proposals must consider potential pollution effects, and relevant authorities will be consulted early in the process. The Council aims to control and reduce pollution, requiring detailed lighting schemes to minimise light pollution. Decisions will ensure new developments do not pose pollution risks to existing developments and are appropriate for their location.

12.30. Where there is an identified risk of pollution, new development should be accompanied by a Construction Environment Management Plan (CEMP). The CEMP should include details of protection, mitigation, and enhancement measures, such as Sustainable Drainage Systems (SuDS) and soil management during construction to avoid compaction and sediment-laden run-off.

12.31. The Council will consult statutory pollution control authorities at an early stage for proposals that may raise pollution concerns. This ensures that developments are assessed for their potential impacts on health, the natural environment, and amenity.

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The cumulative impacts on air quality will be considered, and developments within Air Quality Management Areas must align with local air quality action plans.

12.32. External lighting proposals must demonstrate that lighting is the minimum needed for security and working purposes, minimising light pollution from glare and spillage. This is particularly important in areas of open countryside and nature conservation value, ensuring that lighting does not detract from residential amenity or highway safety.

12.33. By addressing these various forms of pollution, the policy aims to safeguard the environment and public health, ensuring that development in East Devon is sustainable and responsible.

High quality agricultural land

12.34. This policy restricts development on the best and most versatile agricultural land (Grades 1, 2, and 3a) unless there is an overriding need and no suitable lower-grade land is available.

Policy OL10: Development on high quality agricultural land

Unless allocated for development under another plan policy, planning permission for development affecting the best and most versatile agricultural land (Grades 1, 2 and 3a) will only be granted exceptionally if :

A. Sufficient land of a lower grade (Grades 3b, 4 and 5) is unavailable, or available lower grade land has an environmental value recognised by a statutory wildlife, historic, landscape or archaeological designation outweighing the agricultural considerations; or

B. The benefit of the development justifies and clearly outweighs the loss of high quality agricultural land.

If there is a choice between sites in different grades, land of the lowest grade available must be used except where other sustainability considerations, including intrinsic nature conservation value of a site, outweigh land quality issues.

Where best and most versatile land is developed a soil handling plan and sustainable soil management strategy based on detailed soil surveys should be submitted as part of the planning application. Topsoil should be protected during development and retained for reuse.

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This policy applies in the Cranbrook Plan area.

Justification for policy

12.35. East Devon has a significant amount of high-quality agricultural land, particularly near settlements where development pressures are greatest. Local Plan policy aims to conserve and protect the highest grades of agricultural land, balancing this with the need to accommodate development.

12.36. Soils are a finite, multi-functional resource essential for wellbeing and prosperity. Development decisions should consider the impact on soils, their intrinsic character, and the sustainability of the ecosystem services they provide. When developing the best and most versatile agricultural land, a soil handling plan and sustainable soil management strategy, based on detailed soil surveys, will be required to minimise detrimental impacts and ensure that topsoil is retained on site wherever possible.

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Our Outstanding Biodiversity and Geodiversity



Chapter 13. Our Outstanding Biodiversity and Geodiversity

Introduction

13.1. East Devon boasts a rich abundance of biodiversity and geodiversity, from Internationally Designated Sites to extensive networks of priority habitats and protected species. These resources are invaluable for nature conservation, scientific research, health and wellbeing, education, climate change mitigation, flood risk management, air and water purification, and the economy.

13.2. However, these natural assets are threatened by factors such as climate change, agriculture, pollution, land use change, urbanisation, and population growth. These impacts can be complex, arising through both direct and indirect mechanisms.

13.3. The importance of wildlife and the natural world is increasingly recognised by the Government, as evidenced by the Environment Act 2021[88] and the Government's 25 Year Environment Plan[89].

13.4. The new local plan policies aim to protect, enhance, and expand existing biodiversity features while creating new habitats. The plan seeks to improve the quality and accuracy of ecological information and enhance avoidance, mitigation, and compensation outcomes from granted permissions.

13.5. All proposals should follow the Mitigation Hierarchy: first, avoid biodiversity impacts; if unavoidable, mitigate them; and as a last resort, compensate for residual impacts. Compensation should only be considered when avoidance and mitigation are unachievable. For developments requiring a Habitats Regulations Assessment,

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[88] ENV-013 – Environment Act 2021, https://www.legislation.gov.uk/ukpga/2021/30/contents [accessed 9th Jan 2025]

[89] ENV-014 – A Green Future: Our 25 Year Plan to Improve the Environment, https://eastdevon.gov.uk/media/0kjlidka/env-016-25-year-environment-plan.pdf

compensation is only permissible under exceptional circumstances of overriding public interest.



FIGURE 15 Seaton Wetlands

Protection of wildlife sites

13.6. Many sites in East Devon are protected due to their intrinsic importance and the wildlife they support. These sites receive considerable legal protection, which is further articulated through planning policy. This policy clarifies existing legislation and government guidance, detailing when impacts may be permitted, expectations for biodiversity enhancement, and the designations included within the policy scope.

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Stategic Policy PB01: Protection of internationally and nationally important wildlife sites

International and nationally designated wildlife sites are of greatest importance and must be given upper most protection.

Development proposals that would cause a direct or indirect adverse effect upon internationally and nationally designated sites will not be permitted unless all of the following criteria are met:

A. They cannot be located on alternative sites that would cause less or no harm;

B. The public benefits of the proposal clearly outweigh the impacts on the features of the site and the wider network of natural habitats and designated sites;

C. Suitable avoidance and mitigation (and exceptionally where legally compliant compensation) measures are secured, in accordance with the mitigation hierarchy;

D. Where permanent or long-term temporary habitat loss or direct reduction of habitat condition is identified, bespoke compensation measures will need to be agreed. This must be undertaken as early as possible and include utilisation of the Discretionary Advice Service from Natural England; and

E. In respect of internationally designated sites, the overall coherence of the national site network must be maintained.

Internationally designated sites falling under this aspect of policy include:

A. Special Areas of Conservation (SAC);

B. Special Protection Areas (SPA);

C. Proposed SACs;

D. Potential SPAs;

E. Ramsar sites;

F. Proposed Ramsar sites.

G. Areas secured as compensation for damage to an internationally or nationally designated site

Nationally designated sites falling under this aspect of policy include:

A. Sites of Special Scientific Interest (SSSI);

B. Marine Conservation Zones (MCZ);

C. National Nature Reserves (NNR).

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This policy applies in the Cranbrook Plan area.

Justification for policy

13.8. Statutory designated wildlife sites benefit from substantial protection under national legislation. This policy does not duplicate these protections but provides additional detail on permissible impacts and biodiversity enhancement expectations.

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Policy PB02: Protection of regionally and locally important wildlife sites

Development proposals that would cause a direct or indirect adverse effect upon Regionally and Locally important wildlife sites and features will not be permitted, unless all the following criteria are met:

A. They cannot be located on alternative sites that would cause less or no harm. When destruction of these habitats is proposed, proof of there being no satisfactory alternative will need to be provided;

B. The public benefits of the proposal clearly outweigh the impacts on the features of the site and the wider network of natural habitats and designated sites;

C. The sites have been surveyed in the optimal botanical period by a suitably experience botanist (FISC[90] level 4 (or equivalent) or above) in accordance with published (or updated) designation criteria[91] and suitability assessment; and

D. Suitable avoidance, mitigation and compensation measures are proposed, in accordance with the mitigation hierarchy, commensurate with the ecological value of the site affected, secure for the duration of the development, and providing like-for-like habitat restoration and/or creation and ensuring that there is no degradation to the wider ecological networks and priority habitats.

Such sites include:

A. Local Nature Reserves (LNR);

B. County Wildlife Sites (CWS);

C. Unconfirmed Wildlife Sites (UWS);

D. Special Verges designated for biodiversity.

This policy applies in the Cranbrook Plan area.

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[90] ENV-019 - Field Identification Skills Certificate, https://bsbi.org/field-skills [accessed 7th Jan 2025]

[91] ENV-004 - The Devon Local Sites Manual Policies and Procedures for the Identification and Designation of Wildlife Sites, https://www.dbrc.org.uk/wp-content/uploads/2022/03/CWS-Guidelines-and-appendices-V1.4-March-2022.pdf [accessed 15th Jan 2025]

Justification for policy

13.9. Non-statutory sites of regional and local importance have limited protection under national legislation, relying on local planning policy and the NPPF. The council recognises the biodiversity value and strategic importance of these sites and priority habitats. These ecologically important and often irreplaceable features play a major role in ecosystem resilience and nature recovery. This policy provides clarity on when impacts may be permitted, expectations for biodiversity enhancement, and the designations included within the policy scope. County Wildlife Sites are determined by the Devon Wildlife Trust following rigorous assessment criteria. Unconfirmed County Wildlife Sites have been subject to initial review but not fully assessed to justify designation.

Irreplaceable habitats and important features

13.10. This policy aims to protect irreplaceable habitats and important features such as ancient woodlands, veteran trees, and species-rich hedgerows from destruction or degradation.

Policy PB03: Protection of irreplaceable habitats and important features

Development proposals which would result in the destruction or degradation of irreplaceable habitats will be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists;- this includes impacts through direct, adjacent, or indirect pathways, including lighting and pollution.

Habitats include:

Aancient woodland, ancient and veteran trees (within and outside of ancient woodland).

Mature trees

Mature trees showing early signs of veteranisation or trees classified as 'notable' will require a high evidence burden for any proposed impacts, with mitigation and compensation measures consummate with their value.

Hedgerows

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Important hedgerows as defined by the Hedgerow Regulations 1997[92], and species-rich Devon hedges have a very high intrinsic biodiversity value. Proposals resulting in the loss and/or degradation of these hedgerows, will only be permitted where the mitigation hierarchy has been applied and evidenced in earnest.

Impacts should first be avoided, and where this is not possible, justification for impacts should be provided in full. Following this, suitable avoidance and mitigation measures should be proposed, followed by compensation measures as a last resort. Any compensatory hedges should be species-rich, include a bank, standard trees, and be mindful of temporal time scales to become a functional habitat in their replacement ratios.

Hedgerow translocation should always be considered first, as a preferential option to hedgerow destruction followed by compensation.

Hedgerow management should be in accordance with, Hedgelink guidance and the Tree, Hedge, and Woodland Strategy for East Devon. Any new hedges must be distinctive to the local area.

Priority Habitats[93] and habitats supporting protected and notable species

Impacts on Priority Habitats and habitats which support the functionality of Priority Species, such as bat foraging and commuting habitats, cirl bunting nesting and foraging habitat will require adequate mitigation and compensation for any potential direct or indirect adverse impacts from development.

Mitigation and compensatory requirements, including details regarding long-term maintenance of functional habitats, must be explicitly quantified within submitted Ecological Impact Assessments (EcIAs) to ensure these can be appropriately secured. EcIAs should be informed by recent survey information undertaken at suitable time of year following best practice guidelines and BS 42020:2013[94] (or superseding standard).

[92] ENV-020 – The Hedgerows Regulations 1997, https://eastdevon.gov.uk/media/zolnismd/env-020-the-hedgerows-regulations-1997.pdf

[93] Habitats of Principle Importance, as listed under Section 41 of: ENV-007 - Natural Environment and Rural Communities (NERC) Act 2006, https://www.legislation.gov.uk/ukpga/2006/16/contents (identified through site survey work or as identified through existing mapped resources)

[94] ENV-029 - BS 42020:2013 Biodiversity. Code of practice for planning and development, https://knowledge.bsigroup.com/products/biodiversity-code-of-practice-for-planning-and-development?version=standard [accessed 15th Jan 2025]

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This policy applies in the Cranbrook Plan area.Justification for policy

13.11. Some habitats, including ancient woodlands and veteran trees, are irreplaceable due to their age, uniqueness, and biodiversity. Planning permission will not be granted for proposals that could harm these habitats unless there are exceptional reasons and a robust mitigation/compensation strategy, as per the NPPF.

13.12. Hedgerows, particularly in East Devon, are valuable biodiversity resources often threatened by development. Protecting and enhancing these features is crucial. The policy promotes the translocation of hedgerows over destruction, ensuring better quality and retention of ecological niches. All development proposals should include adequate mitigation and compensation measures, informed by recent ecological surveys and best practice guidelines.

Habitat Regulation Assessment

13.13. The most significant wildlife sites in East Devon benefit from an international designation and for these sites and where adverse impacts may be possible from development there is a need for assessment under the Habitat Regulations to determine the acceptability of proposals. Plan policy set out details of the approach to be taken.

Strategic Policy PB04: Habitats Regulations Assessment

HRA avoidance and mitigation strategies and guidance

Subject to exceptional circumstances referred to in policy PB01, proposed plans or projects must not adversely affect the integrity of sites protected under the Conservation of Habitats and Species Regulations 2017[95]. These sites consist of:

A. Special Areas of Conservation (SAC);

B. Special Protection Areas (SPA);

C. Proposed SACs;

[95] ENV-021 – The Conservation of Habitats Species Regulations 2017, https://www.legislation.gov.uk/uksi/2017/1012/contents [accessed 14th Jan 2025]

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D. Potential SPAs;

E. Ramsar sites;

F. Areas secured as sites compensating for damage to a European site.

The proponent of the plan or proposal must provide all necessary information to allow the planning authority to carry out Habitats Regulations Assessment (HRA) of the proposal.

Where there are likely significant effects to a European site, alone or in-combination, from an application, mitigation measures will need to be secured. Appropriate assessment will be necessary and will need to ensure mitigation measures are adequate and secured for as long as the impact might occur. Legislation and government guidance requires the planning authority to be confident beyond reasonable scientific doubt that the proposals will not result in an adverse effect on the integrity of the site. Consequently, we will require evidence of a high quality and accuracy to inform HRA and we will seek the advice of the statutory conservation body (Natural England).

Where it is not possible to rule out adverse effects on integrity, alone or in-combination with other plans or projects, permission will only be granted in exceptional circumstances. In such cases it will be necessary to demonstrate that there are no alternatives, there is over-riding public interest and compensation can be secured).

Specific HRA mitigation strategies and guidance

Plans and proposals should take into consideration and be in accordance with the latest versions of all council and wider HRA guidance documents and strategies. These documents and strategies are intended to facilitate HRA assessment by providing a coherent strategic approach to the delivery of mitigation requirements whilst avoiding unnecessary duplication of assessment effort. These documents include (existing and pending production):

A. South-East Devon European Sites Mitigation Strategy (existing – and undergoing review)

B. Beer Quarry Caves SAC Guidance Document (existing)

C. Exmouth Imperial Recreation Ground Events Protocol (existing)

D. River Axe SAC Mitigation Strategy (proposed)

E. Pebblebed Heaths - Vehicle emission impacting on designated site (proposed)

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Specific HRA policy requirements in relation to avoiding, mitigating and compensating for HRA impacts

The South-East Devon European Sites Mitigation Strategy (SEDESMS)[96]

In respect of the Exe Estuary SPA and the East Devon Pebblebed Heaths SPA/SAC (and Dawlish Warren SAC in Teignbridge District) an over-arching strategic approach to HRA mitigation has been established and a new strategy is nearing completion at early 2025. All residential development schemes within a straight line 10 kilometers distance of any part of the European sites will be required to provide mitigation to offset increased recreational pressure associated with new development.

Developers must clearly demonstrate that mitigation can and will be provided to ensure no adverse effect on the integrity of the European sites and identify and secure mechanisms through which delivery will be achieved, secured in perpetuity, and delivered within agreed timescales. All mitigation is to be delivered in accordance with the most recently adopted/approved version of the strategy and supporting guidance.

Development within 400m of the East Devon Pebblebed Heaths – SPA and SAC

Predation of birds by domestic cats, direct recreational disturbance, dog related impacts and urban effect impacts are identified as a particular concern on the East Devon Pebblebed Heaths. To help preserve the integrity of the East Devon Pebblebed Heaths, specifically on account of these potential impacts, new dwellings and tourist accommodation or other developments that may result in unacceptable impacts will not be permitted on or within 400 meters of the Pebblebed Heaths.

Nutrient neutrality in the River Axe SAC catchment

East Devon District Council requires development proposals within the River Axe SAC catchment to demonstrate how nutrient neutrality will be achieved in accordance with the latest guidance and nutrient budget calculator provided by Natural England or local calculator (if subsequently approved). Non-standard proposed mitigation techniques will require evidence of their effective use elsewhere and/or utilisation of Natural England Discretionary Advice Service.

[96] ENV-009 - South-east Devon European Site Mitigation Strategy 2014 - https://eastdevon.gov.uk/media/369997/exe-overarching-report-9th-june-2014.pdf

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Protection of Beer Quarry Cave SAC bat pinch points between Seaton and Colyford, and between Colyford and Colyton[97]

In order to protect the pinch points and secure their long-term suitability for the SAC bat species, the council will not support any applications which reduce the quality or functionality of the bat foraging and commuting habitats within these pinch points, such as through hedgerow\tree loss and adverse impacts from lighting. The objective is for these pinch points to be retained in perpetuity and enhanced where possible in order to guard against potential future development pressure.

Vehicle emission impacting on designated sites

Development will not be permitted where there is potential for increased vehicle numbers, applying a precautionary approach, resulting in increases of emissions of nitrogen oxides (NOx) and/or ammonia (NH3), from internal combustion engine vehicles exceeding threshold levels of harm to designated sites (specifically the Pebblebed Heaths).

This policy applies in the Cranbrook Plan area.

Justification for policy

13.14. As a Competent Authority, the planning authority must carry out Habitats Regulations Assessments (HRA) under the Conservation of Habitats and Species Regulations 2017. East Devon contains seven habitats sites of international importance, including the Exe Estuary SPA and East Devon Pebblebed Heaths SAC.

13.15. All plans and projects not directly connected with the conservation management of a habitats site require an HRA Screening to assess potential significant effects. If significant effects cannot be excluded, an Appropriate Assessment must be conducted,. Planning permission will only be granted if adverse effects on the site's integrity are ruled out or if there are imperative reasons of overriding public interest with adequate compensation.

[97] ENV-005 - Beer Quarry and Caves (SAC) Habitats Regulations Assessment (HRA) Guidance - https://eastdevon.gov.uk/planning/beer-quarry-and-caves-sac-guidance/

Draft document

13.16. The South-East Devon European Sites Mitigation Strategy (SEDESMS) ensures that residential and non-residential developments within 10 km of the Exe Estuary or Pebblebed Heaths provide necessary mitigation. This includes on-site and off-site measures such as wardening, education, access changes, habitat improvements, and Suitable Alternative Natural Green Space (SANGS). SANGS must provide 8 hectares of open space per 1,000 new residents and be appealing to dog walkers.

13.17. To preserve the East Devon Pebblebeds Heath, new residential uses within 400 metres of the SPA are prohibited. Mitigation must be provided in perpetuity, with developer-led SANGS implemented before development occupancy. The council may use Compulsory Purchase Order powers to ensure land availability for SANGS. Monitoring will ensure mitigation keeps pace with development to protect the integrity of European sites.



FIGURE 16 Low tide on the Exe Estuary/the sea

13.18. **River Axe SAC:** The River Axe SAC is impacted by poor water quality due to increased phosphate levels. Proposals increasing phosphate levels require HRA, with mitigation secured in perpetuity. This includes new residential units and overnight accommodation. The River Axe HRA Mitigation Strategy will address these issues, following the mitigation hierarchy and a precautionary approach.

13.19. Beer Quarry Caves SAC Pinch Points: Semi-natural habitats between Seaton, Colyford, and Colyton are crucial for bat species from the Beer Quarry and Caves SAC. Development in these pinch points could severely impact bat movement and foraging. The Beer Quarry and Caves HRA guidance[98] provides specific requirements for developments in these zones.

13.20. Vehicle Emissions Impacting Designated Sites: Atmospheric nitrogen deposition affects the East Devon Pebblebed Heaths, leading to vegetation changes and adverse impacts on fauna. Development increasing traffic and emissions will not be permitted without mitigation[99]. Monitoring will ensure other designated sites, including the River Axe, are protected from similar impacts.

Biodiversity Net Gain

13.21. Biodiversity net gain is the principle that the net result (the end position) after development has occurred is that the biodiversity or wildlife value is greater than before the site was developed. The Government support biodiversity net gain and in East Devon we recognise the importance and are seeking to exceed minimum national levels.

Strategic Policy PB05: Biodiversity Net Gain

Major development[100] proposals will need to deliver biodiversity net gain (BNG) of at least 20% to be calculated using the most up-to-date statutory metric. Where there is a demonstrable viability problem to achieve this target, it will be expected that all measures to exceed the national minimum requirements are made, and evidence for not achieving the 20% target is provided in full. Non-major developments will be required to secure at least 10% BNG.

[98] ENV-005 - Beer Quarry and Caves (SAC) Habitats Regulation Assessment (HRA) Guidance, updated 2024: https://eastdevon.gov.uk/planning/beer-quarry-and-caves-sac-guidance/

[99] ENV-006 - Site Improvement Plan: East Devon Heaths (SIP070): https://eastdevon.gov.uk/media/u1snlw3l/env-008-site-improvement-plan-east-devon-heaths-sip070.pdf

[100] NPPF : https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf (definition in Annex 2 – for housing 10 or more homes/0.5 hectares or more for other uses -additional floorspace of 1,000 SqM or more).

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All applications subject to biodiversity net gain will need to be supported by a Biodiversity Gain Statement which clearly demonstrates how the biodiversity gain hierarchy has been followed. The statement will need to be supported by a completed biodiversity metric (including condition assessment sheets) and demonstrate how BNG will be delivered in accordance with good practice principles for development[101], BS 8683:2021102, and local guidance (or subsequently updated guidance). Any development proposal including significant onsite gains will need to include a Habitat Management and Monitoring Plan (HMMP) and be clear in terms of how habitats will be maintained, appropriately monitored, and reported for 30 years. The statement should provide the expected balance of any off-site gains and whether the use of statutory biodiversity credits is expected.

Where offsite habitats are created or enhanced to deliver BNG, in full or in part, the delivery should be provided within the locality of the impact and contribute to ecological networks and published strategies in accordance with BNG principles. Offsite habitat delivery should prioritise the recovery of ecological networks, priority habitats, and contribute to the aims and objectives of the Local Nature Recovery Strategy (LNRS), and other locally published plans, policies, and strategies including the Clyst Valley Regional Park, Tree, Hedge, and Woodland Strategy for East Devon, and the East Devon Nature Recovery Plan.

Where there is evidence of deliberate habitat degradation on development sites prior to the submission of planning applications, a precautionary view in terms of the habitat distinctiveness and condition will be assumed unless there is evidence to support a lower categorisation.

Developments exempt from mandatory BNG are required to deliver ecological enhancements consummate with the scale of development. Self-build developments will be required to provide a completed statutory biodiversity metric to evidence their baseline ecological value and the predicted ecological outcome of the development.

This policy does not apply in the Cranbrook Plan area.

[101] ENV-022 - Biodiversity Net Gain: Good practice principles for development, 2016: https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf Or as may be superseded.

[102] ENV-023 - BS BS8683:2021 Process for designing and implementing biodiversity net gain, https://knowledge.bsigroup.com/products/process-for-designing-and-implementing-biodiversity-net-gain-specification?version=standard [accessed 14th Jan 2025]

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Justification for policy

13.22. The Environment Act 2021[103] requires development proposals to achieve a minimum 10% BNG. This is crucial in addressing the ecological emergency, with wildlife populations declining globally and many species facing extinction. In the UK, habitat degradation and fragmentation are significant threats.

13.23. The Lawton Report (2010)[104] emphasised the need for large-scale habitat restoration to create a resilient ecological network. BNG contributes to sustainable development, climate impact mitigation, and improved mental health and well-being.

13.24. East Devon has diverse but fragmented habitats. The council aims to enhance biodiversity by increasing habitat areas, improving quality, and connecting isolated habitats. The Nature Recovery Declaration (2023)[105] commits to exceeding the 10% BNG target, recognising the link between biodiversity and climate crises.

13.25. Recent evidence suggests that a 10% BNG target without species management provides negligible gains. Therefore, the council applies the precautionary principle to ensure effective biodiversity gains. Increasing BNG to 20% is feasible and necessary for significant ecological benefits.

13.26. Habitat bank proposals in East Devon indicate the potential to deliver substantial biodiversity units. Significant growth in the district, including a new community, requires large open-space habitats to offset development impacts. BNG can be integrated with Suitable Alternative Natural Greenspace (SANG) and other mitigation measures.

13.27. BNG delivery opportunities also exist through nutrient neutrality and Landscape Recovery schemes. The 20% BNG policy will apply to major development proposals, ensuring meaningful biodiversity enhancements.

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[103] ENV-013 – Environment Act 2021, https://www.legislation.gov.uk/ukpga/2021/30/contents [accessed 14th Jan 2025]

[104] ENV-024 – Making Space for Nature: A Review of England's Wildlife Sites and Ecological Network, https://eastdevon.gov.uk/media/hn4f1u4f/env-024-making-space-for-nature-a-review-of-england-s-wildlife-sites-and-ecological-network.pdf

[105] ENV-025 – Nature Recovery Declaration for East Devon, https://eastdevon.gov.uk/media/hn4f1u4f/env-024-making-space-for-nature-a-review-of-england-s-wildlife-sites-and-ecological-network.pdf

Local Nature Recovery Strategy and Nature Recovery Network

13.28. Local nature recovery is the concept that environmental quality and biodiversity can be enhanced by improving areas for wildlife and creating green links between habitats. This policy supports proposals that enhance existing Nature Recovery Networks (NRNs) and features within them, expands NRN areas, and improvements in landscape-scale connectivity of ecological features.

Strategic Policy PB06: Local Nature Recovery Strategy and Nature Recovery Network

Proposals which result in enhancement of existing and any subsequentially defined NRNs and features that contribute to their importance, through habitat creation appropriate to network type, will be supported. Along with this, support will also be given for proposals leading to increased landscape scale connectivity of NNRs and ecological features within them.

Development proposals within NRN defined areas will be required to provide mitigation in the form of biodiversity improvements that are compatible with and lead to net improvements within or that are directly relevant to the NRN in which they fall.

Anywhere in East Devon, where or when there is off-site biodiversity net gain, or other off-site biodiversity contributions tied to planning permission for development, the expectation will be for these to be located inside, adjacent to or otherwise contribute to the overall NRN and its biodiversity importance, or to a specific NRN areas and its biodiversity importance.

Biodiversity net gain (BNG) relevant to NRN areas and their expansion and connectivity, is are formally identified as being of strategic significance within the Statutory Biodiversity Metric Calculation Tool[106]

This policy applies in the Cranbrook Plan area.

[106] ENV-026 - How is Biodiversity Net Gain Measured? https://eastdevon.gov.uk/planning/biodiversity-net-gain/how-is-biodiversity-net-gain-measured/

Draft document

Justification for policy

13.29. The Environment Act 2021 mandates a Local Nature Recovery Strategy (LNRS) for each area in England. Devon County Council is responsible for delivering the LNRS, with input from local authorities like East Devon District Council (EDDC). The LNRS includes biodiversity priorities and a local habitat map, forming the Nature Recovery Network (NRN)[107]. The intent, in the summer of 2025, is that the statutory LNRS mapping will be published. East Devon District Council will produce additional mapping and guidance to complement and add additional detail to the Devon County Council mapping. Any subsequent guidance and mapping should be taken into account in delivery of biodiversity enhancement.

13.30. The LNRS and NRN aim to implement the Lawton Report's principles of creating "bigger, better, and more joined-up"[108] ecological networks. This involves improving, expanding, and connecting habitats to enhance ecological resilience and focus nature recovery efforts.

13.31. The LNRS outlines:

- Biodiversity descriptions of the strategy area.
- Opportunities for biodiversity recovery and enhancement.
- Priority habitats and species for recovery.
- Measures to achieve these goals.

13.32. The NRN map (and any subsequent mapping) combines existing wildlife sites and extends habitats based on geology and soil conditions to identify focused areas for nature recovery. Key sites features in mapped NRN areas include SACs, SPAs, Ramsar sites, SSSIs, MCZs, NNRs, LNRs, County Wildlife Sites, special verges, ancient woodlands, and habitats of principal importance under the NERC Act 2006.

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[107] The Devon County Council Nature Recovery Network can be viewed via: ENV-031 - Devon Nature Recovery Network Map, https://www.devonlnp.org.uk/our-work/nature-recovery-network/nature-recovery-network-map [accessed 15th Jan 2025]

[108] ENV-024 – Making Space for Nature: A Review of England's Wildlife Sites and Ecological Network, https://eastdevon.gov.uk/media/hn4f1u4f/env-024-making-space-for-nature-a-review-of-england-s-wildlife-sites-and-ecological-network.pdf

Design feature for wildlife enhancement

13.33. This policy promotes wildlife enhancement in new developments by requiring features that support biodiversity, such as bird and bat boxes, hedgehog-friendly fencing, and suitable nesting sites.

Policy PB07: Ecological enhancement and biodiversity in the built environment

In addition to features required as part of biodiversity net gain, mitigation or compensation, all proposals are required to incorporate features of biodiversity value tailored to the specific proposals, relevant local receptors and in accordance with best practice to maximise potential benefits.

As a minimum, the following features are required within new proposals:

A. Integrated bird boxes (e.g. swift bricks) in suitable locations at a ratio of one per dwelling, or a relevant number to be agreed for flats or non-dwelling applications, to be provided in accordance with BS42021:2022[109];

B. Provision of integrated bat boxes in locations suitable for use by bats (i.e., adjacent to suitable habitats and not significantly impacted on by artificial lighting);

C. An integrated bat loft within all major planning applications, if ecologically relevant (i.e., if the site is a suitable location for a bat loft to be constructed - not too isolated or within unsuitable habitat such as heavily urbanised well-lit areas);

D. Gaps (13 cm x 13 cm) in the bases of garden fences, between gardens, and within fences between gardens and wider ecological networks, to facilitate movement of hedgehogs and other protected and notable species; and

E. Provision of overhanging eaves suitable for nesting house martins in all major development

The location and specification of biodiversity features should be designed with input from a qualified ecologist and informed by the most up to date research and guidance at the time of application. Bat and bird boxes should be integrated within the fabric of

[109] ENV-027 - BS 42021:2022 Integral nest boxes. Selection and installation for new developments. Specification. https://knowledge.bsigroup.com/products/integral-nest-boxes-selection-and-installation-for-new-developments-specification-1?version=standard [accessed 15th Jan 2025]

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the building to ensure longevity and retention when ownership changes (to avoid removal by new owners).

This policy applies in the Cranbrook Plan area.

Justification for policy

13.34. Significant development growth in East Devon will increase pressure on the natural environment but also offers opportunities for nature recovery. This policy supports the biodiversity objective of the Environment Act 2021 and is crucial for the recovery of species like swifts, which are currently in decline.

13.35. Paragraph 185b of the NPPF emphasizes enhancing ecological networks and recovering priority species. This policy aligns with these goals by requiring features that benefit priority species, such as birds, bats, reptiles, and hedgehogs, which can thrive in urban environments if provided with suitable habitats.

13.36. The BS42021:2021 guidance highlights the high occupancy rates of integrated bird boxes, endorsed by the RSPB and major housing developers. EDDC supports this guidance and promotes its use district-wide.

13.37. Ongoing research and guidance from organisations like the National House Building Council and the UK Green Building Council provide cost-effective measures for integrating biodiversity into the built environment. These measures require minimal maintenance and contribute significantly to nature recovery.

13.38. Additional features for wildlife enhancement:

- Reptile/amphibian hibernacula
- Brash and log piles
- Invertebrate bricks and bee hotels
- Water butts
- Wildlife ponds
- Sustainable urban drainage systems (e.g., swales and pools with native vegetation)
- Native hedge planting
- Swift/wildlife towers and green roofs
- Barn owl lofts

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- Bat, bird, and dormouse boxes in trees and hedges

13.39. These features should be designed with input from qualified ecologists and integrated into the building fabric to ensure longevity and retention.

Trees in East Devon

13.40. Trees, woodlands, and hedges are vital for enhancing landscapes, providing wildlife habitats, supporting sustainable drainage, sequestering carbon, and improving public health.

Policy PB08: Tree, hedges and woodland on development sites

Retention of existing trees and hedges

Where trees are present on a development site proposals will need to be designed, and schemes implemented, in a manner that retain good quality and healthy woodland, trees and hedgerows. This is to specifically include protection of : ancient woodland; ancient and veteran trees; those with visual amenity value; those that support wildlife (such as some appropriate U category trees as part current BS 5837[110]) or provide habitat connectivity; those which positively contribute to local landscape character, the historic environment or the significance of a heritage asset and its setting; and rare or unusual species of trees. These protected assets will need to be incorporated into the overall design and landscape scheme, within public spaces where possible.

Where justifiable and unavoidable tree and hedge losses occur, there will need to be adequate compensation for on the development site or on publicly accessible land in accordance with the minimum compensation requirements for trees listed in the Table below. This replacement policy also applies to trees with Ash dieback (or any other future serious tree pest or disease) on development sites.

Tree protection on development sites

[110] ENV-028 - BS 5837:2012 Trees in relation to design, demolition and construction. Recommendations, https://knowledge.bsigroup.com/products/trees-in-relation-to-design-demolition-and-construction-recommendations?version=standard&tab=history [accessed 14th Jan 2025]

Draft document

All development proposals where trees over 75mm diameter at 1.5m and native hedges are present, or where trees outside of the boundary are within the root protection area or the crowns of which overhang the development boundarywill need to be informed by British Standard BS 5837 Trees in relation to design, demolition and construction (or the most up to date version), the recommendations of which will be taken fully into account in the scheme design.

The planning application will be accompanied by a detailed appraisal of their condition, location, and ecological and landscape significance both at the time of the application and with an assessment of their potential future value. Applications should include an arboricultural method statement and tree protection plan to be followed during construction, reflecting the latest arboricultural standards for any tree works or development near to trees and demonstrating appropriate root protection areas.

Where woodland, trees and hedges are to be removed they should be accurately identified, with a clear justification set out for their loss, together with details of any mitigation or replacement planting as part of an overall approach to achieving biodiversity net gain. Development proposals that have not properly considered or prioritised development options enabling the retention of woodlands, trees and hedgerows will be refused.

No building, hard surfacing, drainage or underground works will be permitted that does not accord with the principles of BS 5837 or Volume 4 National Joint Utilities Group (NJUG) Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees – Issue 2 (or the current revision or any replacement) unless, exceptionally, the Council is satisfied that such works can be accommodated without harm to the trees concerned or there are overriding reasons for development to proceed.

To avoid issues with subsidence all developments, including permitted development, will require appropriate depth of foundations considering local soil geology and water demand of nearby trees (and those proposed as part of an approved landscape planting scheme) at full maturity in accordance with current industry guidance.

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Trunk diameter of tree lost to development (cm measured at 1.5 m above ground)Number of replacement trees[111]7 – 19.9120 – 29.9230 – 39.9340 – 49.9450 – 59.9560 – 69.9670+7Provision of new trees and hedgerows on development sites

The provision of new trees and hedges shall be based on the principles outlined in the Devon Tree Strategy, the Tree, Hedge, and Woodland Strategy for East Devon, Devon County Right Tree Right Place Guidance, and New Devon Hedges and relevant guidance provided by Trees and Design Action Group (TDAG).

Tree planting design and maintenance should:

A. Take into account climate change and local landscape characteristics. Planting material should be sourced in accordance with the national strategy for biosecurity;

B. Allow sufficient space for existing and newly planted trees to grow to maturity, both above and below ground;

C. Ensure that any new streets are, where possible and it is commercially viable and it would not compromise other compelling design or operational highway considerations, tree-lined and residential areas and development sites as a whole will contribute towards 30% tree cover target for urban areas within the District.

D. Use large canopy tree species within new development as these provide the greatest benefits for increasing canopy cover, providing shade, intercepting rainfall and increasing biodiversity.

Within or adjacent to areas of paving where available soil volumes are likely to be restricted, technical solutions should be used to ensure that adequate soil volume and suitable growing conditions are provided, such as water infiltration, drainage and aeration, to enable new trees to establish and reach maturity as per industry best practice. These solutions must also prevent soil compaction and provide a load bearing capacity sufficient for the task for which the surface is designed for.

This policy applies in the Cranbrook Plan area.

[111] Based on the Bristol Tree Replacement Standard (BTRS) See: Supplementary planning documents and other planning guidance - Bristol Tree Replacement Standard: https://www.bristol.gov.uk/residents/planning-and-building-regulations/planning-policy-and-guidance/supplementary-planning-documents-practice-notes-and-other-planning-guidance

Draft document

Policy PB09: Monitoring requirements for new planting schemes

Appropriate measures to ensure that new planting schemes are implemented in accordance with the approved details and to secure their long-term management and maintenance will be required including arrangements for monitoring. For major developments this will also require the placement of a financial bond by the developer prior to the commencement of construction, equal to 25% of the calculated planting cost for the scheme, or agreed phase, to be released on fulfilment of the following to the satisfaction of the planning authority:

A. Within 1 month of the completion of planting works, the issue of a signed certificate by the developer's landscape architect or other appropriately qualified/ experienced professional consultant confirming that the planting works have been overseen by them and completed in accordance with the approved details.

B. For years 1-5 thereafter, the issue of an annual inspection report by the developer's landscape architect confirming that maintenance of the scheme has been caried out in accordance with the approved details and identifying any plant failures or other defects that require rectification together with a program for their implementation at the earliest opportunity. The annual certificate shall also confirm the satisfactory rectification of any defects identified during the previous year's inspection.

This policy applies in the Cranbrook Plan area.

Justification for policy

13.41. Trees, woodlands, and hedges are crucial green infrastructure assets that enhance landscapes, provide wildlife habitats, support sustainable drainage, sequester carbon, and improve public health. New developments must incorporate existing natural features early in the design process and include new plantings to create pleasant spaces and future mature trees. Protection and management during development are essential for their long-term health.

13.42. Planning applications must demonstrate how they meet policy requirements regarding trees, woodlands, and hedges. In cases of exceptional loss of ancient woodlands or veteran trees, compensation strategies such as planting new native woodlands or improving nearby habitats are required.

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13.43. This policy supports the Tree, Hedge, and Woodland Strategy for East Devon[112], promoting the creation of new green spaces that benefit wildlife and public health.

The Dorset and East Devon Jurassic Coast World Heritage Site

13.44. Most of the East Devon coastline is part of the Jurassic Coast World Heritage Site, recognised for its exceptional geological importance.

Policy PB10: Protection and enhancement of the Jurassic Coast World Heritage Site

Development within the Jurassic Coast World Heritage Site, or that could adversely impact on its setting, will only be permitted if it can be demonstrated that the Outstanding Universal Value of the coastline and specifically its geological importance, will not be adversely affected.

Development proposals that could give rise to adverse impacts, will be assessed in respect of:

A. The setting and importance of the world heritage site;

B. The inherent attributes and geological qualities of the site, specifically relating to its 'Outstanding Universal Value';

C. The grounds and reasons for its inscription; and

D. Its overall integrity (including possible incremental loss) and local impacts of development.

The international importance of the site and its setting is such that development proposals will be rigorously reviewed in determination of planning applications and this policy will sit alongside other affording coastal and countryside protection and enhancement.

This policy does not apply in the Cranbrook Plan area.

[112] ENV-008 - EDDC Tree, Hedge and Woodland Strategy v1.4, https://eastdevon.gov.uk/media/b4dnabwy/env-008-tree-hedge-and-woodland-stratgy-v-1-4.pdf

Draft document

Justification for policy

13.45. The Jurassic Coast, inscribed as a World Heritage Site by UNESCO in 2001, is globally significant for its geology, fossils, and landforms. It is England's only natural World Heritage Site, extending from Orcombe Point at Exmouth to Old Harry Rocks near Swanage, Dorset.

13.46. The Jurassic Coast Partnership Plan (2020-2025)[113] identifies the site's Outstanding Universal Value (OUV), including its stratigraphy, palaeontological record, geomorphological features, and ongoing scientific importance. The high rate of erosion is a key characteristic, maintaining dynamic rock exposures.

13.47. Development proposals within or impacting the site must demonstrate no adverse effects on its OUV. The policy ensures rigorous assessment of such proposals to protect the site's integrity and significance. The majority of the site falls within the East Devon National Landscape area, emphasizing its importance.

13.48. This policy aligns with the Jurassic Coast Partnership Plan, promoting geodiversity and public enjoyment of the site while safeguarding its geological heritage.

Sites designated for their geological importance

13.49. This policy protects nationally designated geological sites, such as Sites of Special Scientific Interest (SSSIs), from adverse impacts of development.

Policy PB11: Protection of designated geological sites

Proposals and plans that would cause a direct or indirect adverse effect upon nationally designated geological sites will not be permitted unless all of the following criteria are met:

A. They cannot be located on alternative sites that would cause less or no harm.

B. The public benefits of the proposal clearly outweigh the impacts on the features of the site and the wider network of natural habitats and designated sites.

[113] ENV-030 – Jurassic Coast Partnership Plan 2020-2025, https://eastdevon.gov.uk/media/qtnjkerd/env-029-jurassic-coast-partnership-plan-2020-2025.pdf

Draft document

C. Suitable avoidance, mitigation and compensation measures are proposed, in accordance with the mitigation hierarchy.

D. the integrity of the site is maintained.

This policy does not apply in the Cranbrook Plan area.

Justification for policy

13.50. Geological sites are designated for their scientific and educational value, often supporting wildlife interests. The underlying geology can determine the presence and value of wildlife species. Some sites are designated as SSSIs for both geological and wildlife value. This policy complements existing legislation and government guidance, detailing when adverse impacts may be permitted.

Regionally Important Geological and Geomorphological Sites

13.51. This policy protects Regionally Important Geological and Geomorphological Sites (RIGS) from adverse impacts of development, ensuring their scientific and educational value is maintained.

Policy PB12: Regionally Important Geological and Geomorphological Sites

The granting of planning permission for development or land-use changes that may have an adverse effect, either directly or indirectly, on Regionally Important Geological and Geomorphological Sites will only be permitted if the justification for the proposed development clearly outweighs any harm to the intrinsic scientific or educational value of the site.

Where development is permitted mitigation will be required to minimise the negative impacts and where this is not possible adequate compensatory enhancement or new site creation schemes will be required.

This policy applies in the Cranbrook Plan area.

Draft document

Justification for policy

13.52. RIGS are important for their geological significance in Devon. Established by the Devon Regionally Important Geological and Geomorphological Sites Group, these sites are valuable educational, historical, and recreational resources. The selection criteria include educational use, scientific study, historical importance, and aesthetic value.

13.53. RIGS often result from development processes, exposing geological features. Recognising these sites as County Geological Sites helps avoid activities that might damage their geological value. Development proposals should consider how to showcase geological features in an informative way.

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Open Space and Sports and Recreation



Chapter 14. Open Space and Sports and Recreation

The importance of open space and sport and recreation facilities

14.1. Access to open spaces is crucial for mental and physical wellbeing. While East Devon has many high-quality open spaces, not everyone has easy access to them. This policy aims to align open space and recreation provision with new development and address current deficits.

Strategic Policy OS01: Access to open space and recreation facilities

Support will be given for the provision of new and enhanced high quality open spaces and access to existing spaces and to sports and recreation facilities.

A key consideration in accommodating new development will be to ensure that residents, visitors to or users of any new scheme must be able to access open spaces and sports facilities and enjoy the benefits that such spaces and facilities offer. Such an outcome will require that availability of space and safe and easy access to it for all. At the outset of designing any development proposal full account must be taken of the need for open space and sports facilities, including suitable access, changing provision, pavilions and other supporting facilities it will generate. High-quality provision must be designed in at the outset.

Qualitative (how good it is) and quantitative (how much there is of it) assessments of open space provision, in respect of what exists now and what is planned will be determining considerations in the decision-making process. Securing planning permission for development will require meeting and ideally exceeding minimum specified standards of provision.

This policy applies in the Cranbrook Plan area.

Draft document

Justification for policy

14.2. Open spaces serve both informal activities, like walking, and formal sports. However, some areas, especially urban ones, lack sufficient facilities. The Council's Leisure

Strategy (2022)[114] and the upcoming Playing Pitch Strategy (2025) will guide improvements and new provisions. The new strategy will assess availability, access and use of pitches used for football, cricket, hockey, rugby and tennis.

14.3. Assessment of existing and planned open spaces will be key in decision-making, ensuring developments meet or exceed minimum standards. This policy helps protect existing facilities and supports the creation of new ones, enhancing public health and wellbeing.



FIGURE 17 Playing pitch at Ottery St Mary

[114] HCO-001 East Devon District Council Leisure Strategy 2021-2031, https://eastdevon.gov.uk/media/fvwb1cy5/east-devon-district-council-leisure-strategy-final-15-06-22.pdf

Quantified open space standards applicable for new development

14.4. New developments, especially housing, must have access to appropriate levels of open space or contribute to new provision to avoid shortfalls. This policy sets quantified open space standards based on Fields in Trust guidelines[115].

Policy OS02: Sport, recreation and open space provision in association with development

Planning permission for new housing development, will be required to provide open space in line with Fields in Trust derived standards and Natural England's Green Infrastructure and Accessible Greenspace Standards,

All major development proposals should include a clear open space strategy explaining how the provision for play responds to local need and provision, provides for all ages and is based on accessibility and an audit of current provision.

On sites over 200 homes developers will be expected to provide an audit of existing open space provision within 1.5km of the development and its capacity to justify inclusion in meeting site open space requirements.

Open space and play provision should accord with the requirements tabled below.

- Up to 20 homes should provide amenity green space suitable for informal play.
- Between 21 and 100 homes should provide on-site Local Areas of Play (LAPs) and amenity green space. On smaller sites in particular, amenity greenspace and designated play areas should be co-located to maximise recreational opportunities.
- Between 100 and 300 homes should provide on-site Local Areas of Play (LAPs), Local Equipped Areas of Play (LEAPs) and amenity green space.
- Between 300 and 500 homes should provide on-site Local Areas of Play (LAPs), Local Equipped Areas of Play (LEAPs), amenity green space and all other open space typologies as set out in the table below.

[115] HCO-003 - Fields in Trust Guidance for Outdoor Sport and Play, https://fieldsintrust.org/content/images/FIT-Standards-2024-Accessible-version.pdf

Draft document

- On sites of more than 500 homes should provide all types of play spaces (LAP, LEAP, NEAP, and additional informal play provision (e.g. MUGA, Pump Track)) for all ages, .amenity green space and all other open space typologies as set out in the table below.

Open space type (defined in Field in Trust standards)	Quantity guideline (hectares per 1,000 population)	Maximum walking guideline distances from dwellings
(A) Amenity green space (including allotments)	0.60	480 metres
(B) Equipped designated play areas	0.25	100m to LAPs, 400m to LEAPs and 1,000m toNEAPs
Parks and gardens	0.80	710 metres
Natural and semi natural green space	1.80	720 metres
Playing pitches	1.20	1,200 metres
Other outdoor pitch space	0.40	1,200 metres
Informal play provision	0.30	700 metres

Additional requirements for residential developments over 200 dwellings

Accounting for open space provision in accordance with the above and any additional existing accessible green space within 1.5 km of the site, all developments of 200 plus dwellings should also seek to ensure that there is or will be:

A. Doorstep Accessible Greenspace (defined as any formal/ informal publicly accessible open space) of at least 0.5ha within 200 metres (under 5 mins walk), or a

B. Local Accessible Greenspace of at least 2ha within 300 metres (5 mins walk from home)

Additionally developments of over 300 dwellings should provide or have access to, a medium sized Neighbourhood Accessible Greenspace of at least 10ha) within 1km (15 minutes' walk from home). For developments of over 1,000 dwellings this rises to 20 hectares of Accessible Greenspace within 2km.

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Accessible Greenspaces can contribute towards other functions such as Suitable Alternative Natural Greenspace (SANG) or Biodiversity Net Gain. New developer provided open space will typically be required on site, unless off-site provision is demonstrated to be of greater benefit.

Open space will be calculated on the basis of an average East Devon residential occupancy rate of 2.26 residents per household as derived from the 2021 census.

Open space provision will be required unless:

A. It is clearly demonstrated that the proposed housing development will provide for a different resident population level than the above or clearly differing needs, in which case moderation of standards may be appropriate; and/or

B. The most meaningful contribution is generated by providing only certain types of space provision, this may be specifically relevant where need generated does not provide sufficient land to meet site size thresholds for a given use; and/or

C. Other substantive open space types are present, or will be provided, and they will provide an alternative better overall open space provision; and/or

D. The site is within a town centre where space is limited, provided that the lack of on-site provision is compensated for by appropriate developer contribution towards new play facilities in the locality.

Open space requirements for non-residential use

Major developments for non-residential uses will need to make space provision of a level that is proportionate to needs arising from the development in question, such as the provision of adequate attractive outdoor sitting/ picnic area for staff on employment sites, and appropriate recreational space on larger sites.

This policy applies to those parts of the Cranbrook Plan area that are NOT allocated for built development.

Justification for policy

14.5. New developments, especially those increasing the population, create a need for additional facilities unless there is already a surplus. This policy requires new facilities to meet the needs generated by development, primarily housing but also other types that affect local populations, such as commercial projects. The Fields in Trust guidance provides positive design and development guidance that can be used to inform development proposals.

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14.6. The policy aims to deliver new open spaces and enhance existing ones alongside residential development. Specialist accommodations, like those for the active elderly, will be assessed similarly, with adjustments for specific needs. Funds from this policy may be pooled to support public open space projects.

Location for new facility provision

14.7. This policy supports the provision of new and enhanced open spaces, sports facilities, and allotments within or near urban areas, ensuring they are accessible and compatible with neighbouring uses.

Policy OS03: Location of facilities for sport and recreation and open

Within or adjoining urban or built-up areas, planning permission will be granted for new open space areas, sports facilities and parks and gardens or for the upgrading or enhancement of existing facilities provided that unacceptable adverse amenity or environmental impacts do not arise from development.

Any new or enhanced provision should be readily accessible to all people with a particular emphasis attached to ensuring safe pedestrian and cycle accessibility. Any built development associated with new facilities should be proportionate in scale or kind to the facilities that exist or are to be provided and where possible close by to existing built development.

This policy applies in the Cranbrook Plan area.

Justification for policy

14.8. New sport and recreation facilities and open spaces can be built in their own right or be accommodated within development sites, especially larger ones, and be integrated into detailed design proposals. They should be accessible to nearby residential populations and centres, avoiding adverse impacts. While new facilities are generally expected to be close to built-up areas, less formal open spaces can be more flexibly located with minimal adverse impacts.

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New allotments and avoiding the loss of existing ones

14.9. This policy supports the creation of new allotments and protects existing ones, ensuring they are well-located and avoid adverse impacts.

Policy OS04: New allotments and avoiding the loss of existing ones

New allotments will be granted planning permission where they are well related to settlements and will avoid adverse environmental or amenity impacts.

Planning permission will not be granted for developments that would result in the loss of existing allotments unless at least one of the tests set out below is satisfied:

A. A development proposal will create a new provision that is equal to or better than that being lost: or

B. There is a demonstrable over-supply, and an over-supply that can be shown to persist in respect of past patterns and future projections of need, in the Parish/town in which the allotment is located.

This policy applies in the Cranbrook Plan area.

14.10. Allotments are valuable community assets, especially in urban areas. The council supports new allotments based on local needs.

14.11. Demand for allotments has increased, making them important for local communities. Loss of allotments is rare and only acceptable if a demonstrable over supply exists or provision is to be replaced with equal or better alternatives, considering factors to include overall size, cost to users, accessibility, and quality of growing conditions.

Sport and recreation facilities in the countryside

14.12. This policy supports the provision of outdoor recreation facilities in the countryside and on the coast, ensuring they are appropriately scaled and located.

Policy OS05: Leisure and recreation developments in the countryside

Planning permission will be granted for outdoor recreation facilities in the countryside and on the coast provided that the nature of the activities undertaken or the space

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requirements of the proposal require a countryside or coastal location and all of the following tests are met:

A. The facilities or development proposals are in scale with the character, environmental characteristics and setting of the area and do not conflict with countryside, nature or landscape policies, nor detract from the amenities of the area

B. The proposals provide for safe and convenient pedestrian and cycling access and discreet parking arrangements, particularly in environmentally sensitive areas.

C. On site facilities are appropriate to meet the needs of the proposal and links with adjacent/nearby footpaths and bridleways are provided. D. Development should not result in net adverse natural environmental impacts and ideally should generate improvements.

The clear policy expectation is that low impact uses only will be accommodated and such uses should be for countryside related activities. Any building work should be small scale and subservient to wider site use and where possible existing building reuse rather than new development should take place. Any new buildings and necessary extensions should be limited in scale and be in close proximity to existing groups of buildings or an existing settlement.

Where it is proposed to extend or intensify an existing use the proposals and any net cumulative additional impacts will be considered in the context of and be required to be compatible with all of the above.

This policy applies in the Cranbrook Plan area.

Justification for policy

14.13. The changing nature of agriculture and the need for rural diversification highlight the importance of outdoor recreation facilities in the countryside. These developments can improve despoiled environments, create wildlife habitats, and provide appealing destinations. However, they must be carefully managed to avoid significant visual impacts on the landscape.

14.14. Activities like horse riding are encouraged if they can be safely accommodated without harming the countryside. Dwellings in the open countryside are not justified based on recreational needs. This policy ensures that new facilities are in scale with their surroundings, provide safe access, and ideally generate environmental improvements.

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Any new buildings should be small-scale, reuse existing structures where possible, and be close to an existing settlement.

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Our Outstanding Historic Environment



Chapter 15. Our Outstanding Historic Environment

15.1. A heritage asset, as defined by the NPPF, is any building, monument, site, place, area, or landscape with heritage interest significant enough to influence planning decisions. This includes both designated and locally identified assets.

15.2. East Devon boasts a rich heritage with distinctive architecture, including Scheduled Monuments, Listed Buildings, Conservation Areas, and more. These assets contribute to the district's unique character and include both man-made structures and natural landscapes shaped by human interaction.

15.3. National policy highlights the importance of conserving heritage assets for their contribution to quality of life. Local authorities must develop strategies for their conservation and enjoyment, focusing on assets at risk.

15.4. The East Devon Heritage Strategy (2024-2042)[116] guides policy implementation, detailing the district's heritage and setting objectives for its preservation. This strategy includes broader designations like National Landscapes, which enhance heritage management.

15.5. Non-designated heritage assets, identified by local authorities, also hold significant value and should be considered in planning decisions. These assets require balanced judgement regarding any potential harm or loss, ensuring their conservation aligns with their significance.

Historic environment

15.6. This policy ensures new developments consider the significance of heritage assets, promoting their conservation and viable use while enhancing local character and distinctiveness.

[116] HRD-004 – East Devon Heritage Strategy (2024-2042), *Link when published*

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Strategic Policy HE01: Historic environment

Proposals for new development that may affect heritage assets should take account of the desirability of sustaining and enhancing the significance of those assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.

Particular encouragement will be given to schemes that will help secure the long term conservation of at-risk, vacant and/or under-used buildings and bring them back into appropriate use.

Non-designated heritage assets, where identified through local or neighbourhood plan-making, the Local List[117], Conservation Area Appraisal or review or through the planning application process, will be recognised as heritage assets in accordance with national guidance and any local criteria. Development proposals that directly or indirectly affect the significance of a non-designated heritage asset will be determined with regard to the scale of any harm or loss and the significance of the asset.

Applicants will be required to describe, in line with best practice and relevant national guidance, the significance of any heritage assets affected including any contribution made by their setting. The level of detail should be proportionate to the asset's importance. In some circumstances a planning condition will require further survey, analysis and/or recording.

Alterations to historic buildings, for example to improve energy efficiency or reduce carbon emissions, should respect the integrity of the historic environment and the character and significance of the building.

This policy applies in the Cranbrook Plan area.

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[117] HRD-005 – East Devon List of Local Heritage Assets (2023), https://eastdevon.gov.uk/media/zrrkvjm3/east-devon-list-of-local-heritage-assets-january-2023.pdf

Justification for policy

15.7. Heritage assets, both designated and non-designated, are crucial to East Devon's character. These include Listed Buildings, Scheduled Monuments, Conservation Areas, and more. Most heritage assets lack statutory designation, relying on the planning system and positive management for conservation.

15.8. Applicants should use resources like the Devon Historic Environment Record and local Heritage Impact Assessments to understand the significance of affected heritage assets. Proposals should align with the Heritage Strategy and relevant guidance.

15.9. Further surveys and analysis may be required for some applications. Heritage Statements and Impact Assessments should follow best practice and national guidance, such as Historic England's advice notes.

15.10. The Council monitors at-risk heritage assets, seeking solutions through discussions with owners and using statutory powers if necessary. Collaboration with stakeholders and support for Neighbourhood Development Plans help protect and enhance the district's heritage.

Listed buildings

15.11. This policy ensures that any development affecting listed buildings conserves and enhances their heritage significance, respecting their architectural and historic features.

Policy HE02: Listed buildings

Proposals for development, including change of use, that involve any alteration of, addition to or partial demolition of, a listed building or within the curtilage of, or affecting the setting of a listed building will be expected to:

A. Conserve, enhance or better reveal those elements which contribute to the heritage significance and/or its setting;

B. Respect any features of special architectural or historic interest, including, where relevant, the historic curtilage or context, such as burgage plots, or its value within a group and/or its setting, such as the importance of a street frontage or traditional shopfronts; and

C. Be sympathetic to the listed building and its setting in terms of its siting, size, scale, height, alignment, materials, building methods and finishes (including colour and

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texture), design and form, in order to retain the special interest that justifies its designation.

Development proposals affecting the significance of a listed building or its setting that will lead to substantial harm or total loss of significance will be refused unless, exceptionally, it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that demonstrably outweigh that harm or loss or where the applicant can demonstrate that:

A. The nature of the heritage asset prevents all reasonable uses of the site;

B. No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;

C. Conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

D. The harm or loss is outweighed by the benefit of bringing the site back into use.

Development proposals (including changes of use) that would result in less than substantial harm to the significance of a listed building or its setting will be expected to:

A. Minimise harm and avoid adverse impacts, and provide justification for any adverse impacts, harm or loss of significance;

B. Identify any demonstrable public benefits or exceptional circumstances in relation to the development proposed; and

C. Investigate and record changes or loss of fabric, features, objects or remains, both known and unknown, in a manner proportionate to the importance of the change or loss, and to make this information publicly accessible.

This policy applies in the Cranbrook Plan area.

Justification for policy

15.12. East Devon has around 4,600 listed buildings and structures, recognised for their national architectural or historic interest. Listing protects both the exterior and interior features, as well as any objects or structures within the curtilage that have been part of the land since before 1 July 1948. Occasionally, land distant from the building may also be considered part of its setting due to historical or functional associations.

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15.13. Listed buildings often have features that support roosting bats. Compliance with relevant legislation requires species survey information and ecological conditions for works likely to impact bats. This policy ensures that development proposals conserve and enhance the significance of listed buildings, respecting their special architectural and historic interest.

Conservation Areas

15.14. This policy ensures that development within or affecting Conservation Areas conserves or enhances their special interest, character, setting, and appearance.

Policy HE03: Conservation Areas

Proposals for development within or affecting the setting of a Conservation Area must conserve or enhance its special interest, character, setting and appearance. Development will be expected to:

A. Contribute to the Conservation Area's special interest and its relationship within its setting. The special characteristics of the Conservation Area (such as existing walls, buildings, trees, hedges, burgage plots, traditional shopfronts and signs, farm groups, medieval townscapes, archaeological features, historic routes etc.) should be preserved;

B. Take into account important views within, into or out of the Conservation Area and show that these would be retained and unharmed;

C. Respect the local character and distinctiveness of the Conservation Area in terms of the development's: siting; size; scale; height; alignment; materials and finishes (including colour and texture); proportions; design; and form and should have regard to any relevant Conservation Area Character Appraisal;

D. Be sympathetic to the original curtilage of buildings and pattern of development that forms part of the historic interest of the Conservation Area;

E. Be sympathetic to important spaces such as paddocks, greens, gardens and other gaps or spaces between buildings which make a positive contribution to the pattern of development in the Conservation Area;

F. Ensure the wider social and environmental effects generated by the development are compatible with the existing character and appearance of the Conservation Area;

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G. Ensure no loss of, or harm to any building or feature that makes a positive contribution to the special interest, character or appearance of the Conservation Area.

Where a proposed development will lead to substantial harm to or total loss of significance of a Conservation Area, consent will only be granted where it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits that outweigh that harm or loss.

Where a development proposal will lead to less than substantial harm to the significance of a Conservation Area, this harm will be weighed against the public benefits of the proposal.

Wherever possible the sympathetic restoration and re-use of structures which make a positive contribution to the special interest, character or appearance of the Conservation Area will be encouraged to prevent harm through the cumulative loss of features which are an asset to the Conservation Area.

This policy applies in the Cranbrook Plan area.

Justification for policy

15.15. East Devon has 33 Conservation Areas, covering parts of main towns and historic cores of smaller settlements. These areas are designated for their special architectural or historic interest, which legislation seeks to preserve and enhance. Conservation Areas include groups of buildings, open spaces, trees, historic settlement patterns, and archaeological features. Development must preserve or enhance the character of these areas, considering important views, local character, and significant spaces.

Archaeology and Scheduled Monuments

15.16. This policy protects Scheduled Monuments and archaeological remains, ensuring development proposals consider their significance and setting.

Policy HE04: Archaeology and Scheduled Monuments

Development must protect the site and setting of Scheduled Monuments, designated or undesignated archaeological remains, including ancient routeways and milestones.

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Applicants will be expected to undertake an assessment of appropriate detail to determine whether the development site is likely to contain archaeological remains. Proposals must show how the development proposals have had regard to any such remains.

Where the assessment indicates archaeological remains on site, and development could disturb or adversely affect archaeological remains and/or their setting, applicants will be expected to:

A. Submit an appropriate archaeological desk-based assessment; and/or

B. Undertake a field evaluation (conducted by a suitably qualified archaeological organisation), where necessary.

Nationally important archaeological remains (whether scheduled or demonstrably of equivalent significance) should be preserved in situ. Non-designated archaeological sites or deposits of significance equal to that of a nationally important monument will be assessed as though those sites or deposits are designated.

Where a proposed development will lead to substantial harm to or total loss of significance of such remains consent will only be permitted where it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

Where a development proposal will lead to less than substantial harm to the significance of such remains, this harm will be weighed against the public benefits of the proposal.

For other non-designated archaeological remains, the effect of a development proposal on the significance of the remains, either directly or indirectly, will be taken into account in determining the application.

In exceptional cases, where harm to or loss of significance to the asset is considered to be justified, the harm should be minimised, and mitigated by a programme of archaeological investigation, including excavation, recording and analysis. Planning permission may be granted conditional upon a programme of archaeological mitigation agreed with the Council that will be implemented by an appropriately qualified organisation. Unless otherwise agreed with the Council any development should not commence until the approved archaeological works have been satisfactorily completed. The results of the analysis of findings subsequent to the investigation

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should be published and made available to the relevant local and county authorities as well as being made publicly accessible.

This policy applies in the Cranbrook Plan area.

Justification for policy

15.17. East Devon has a significant archaeological heritage, with around 200 Scheduled Monuments legally protected under the Ancient Monuments and Archaeological Areas Act. The Devon Historic Environment Record[118] includes numerous other sites of local interest. Development proposals must assess and consider archaeological remains, preserving nationally important sites in situ. In exceptional cases, harm to or loss of significance must be minimised and mitigated through archaeological investigation and recording. The results should be made publicly accessible to enhance understanding and conservation of the district's archaeological heritage.

Historic Landscapes, Parks and Gardens

15.18. This policy ensures that development proposals conserve or enhance the special historic interest, character, or setting of parks and gardens on the Historic England Register.

Policy HE05: Historic Landscapes, Parks and Gardens

Proposals should conserve or enhance the special historic interest, character or setting of a park or garden on the Historic England Register of Historic Parks and Gardens of Special Historic Interest in England.

Any harm to or loss of significance of any heritage asset requires clear and convincing justification. Substantial harm to or loss of these assets should be wholly exceptional in the case of Grade I and Grade II* Registered Historic Parks and Gardens and exceptional in the case of Grade II Registered Historic Parks and Gardens.

[118] ENV-017 - Devon Historic Environment Record, https://www.devon.gov.uk/historicenvironment/the-devon-historic-environment-record/ [accessed 14th Jan 2025]

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Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, consent will only be granted where it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. All other options for their conservation or use must have been explored.

A balanced judgment, having regard to the scale of any harm or loss and the significance of the heritage asset, will be required in assessing proposals affecting non-designated historic parks and historic landscapes (including historic routes and battlefields).

Applicants will be required to describe, in line with best practice and relevant national guidance, the significance of any heritage assets affected including any contribution made by their setting. The level of detail should be proportionate to the asset's importance. In some circumstances planning conditions will require further survey, analysis and recording.

This policy applies in the Cranbrook Plan area.

Justification for policy

15.19. Historic landscapes, parks, and gardens are vital parts of East Devon's heritage, comprising open spaces, views, archaeological remains, and designed features like planting and water elements. These sites also hold green infrastructure and biodiversity value. Protecting and sympathetically managing these sites and their settings is essential.

15.20. The most significant sites are listed on the Historic England Register of Historic Parks and Gardens and the National Heritage List for England. Additionally, the district has several regionally or locally important sites that should be protected and enhanced where possible. Development proposals must justify any harm to these assets, ensuring substantial public benefits outweigh any loss. Non-designated sites require a balanced judgement based on their significance and the scale of harm or loss.

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Community Facilities



Chapter 16. Community Facilities

16.1. Thriving communities are reliant on having spaces and buildings where people can meet and for community-based activities to take place. Without such spaces many communities would not survive and would not provide the support mechanisms that are needed for the health and wellbeing of their residents. Such facilities also form an important resource that promotes social well-being and cohesion – they make space and place for great things to happen.

Policy CF01: New or extended community facilities

Encouragement will be given to the provision of new social and community facilities and extension of existing facilities.

Planning permission for new community spaces and buildings or extension to existing, to support (typically non-profit making) community events, gathering and activities, will be granted where all of the tests set out below are satisfied:

A. Provision will need to be within, adjoining or physically close to, and as such well related, to built-up parts or edges of a recognisable mass of buildings that reasonably constitutes a town, village or settlement (this test would be met in respect of new land allocations in the local plan for development).

B. Development will be designed to serve local residents. Facilities must be accessible to residents and within safe reasonable walking distance of most potential users of the facility. They will need to be proportionate in scale and size to the needs of that community.

Where possible development proposals must promote the sharing of spaces and facilities with a range of uses and activities typically expected in any development.

This policy applies in the Cranbrook Plan area.

Justification for policy

16.2. Community facilities like halls, schools, libraries, health centres, and places of worship are vital for social activities. The Council supports expanding or creating new facilities, especially in areas with substantial new development or lacking existing facilities. Multi-purpose buildings accommodating various uses are encouraged.

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16.3. The Council also supports the temporary use of residential houses or other appropriate buildings for community activities in the following instances:

- Where there is a perceived demand that needs to be proven before constructing a permanent facility.
- Where a large development is proposed and a temporary space is needed to establish an embryonic community facility early in the construction process. These temporary uses can serve a 'meanwhile' function until a permanent solution is delivered.

16.4. This approach ensures that immediate community needs are met while planning for long-term, sustainable community facilities.

Loss of community facilities

16.5. This policy aims to prevent the loss of community facilities unless they are no longer needed or viable, or an equivalent replacement is provided.

Policy CF02: Loss of community facilities

Planning Permission will not be granted for developments that would result in the full or partial loss or closure of a community facility unless at least one of the tests set out below is met:

A. The community facility (in full or part) is no longer needed by the community or cannot be financially viably sustained or made to be viable. To meet this policy planning applications that would result in a full or partial loss must be accompanied by both an:

1. Assessment, over a shorter and longer term, that demonstrates that a need no longer exists, and
2. A financial viability assessment and demonstration of active marketing that clearly shows that in current or alternative modified community use or different models of ownership, over a shorter and longer term, the facility cannot be sustained.

B. An alternative facility is provided in a pedestrian accessible location to the local community (of equivalent or better accessibility as that to be lost) and is of equal or higher community value and is being provided as an explicit replacement for the lost facility.

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This policy applies in the Cranbrook Plan area.

Justification for policy

16.6. Community facilities are essential, and their loss should be avoided unless they are clearly not needed, not used, or surplus to requirements. Proposals resulting in the loss of facilities must demonstrate a lack of need or viability through assessments and active marketing. Alternatively, an equivalent or better replacement facility must be provided in an accessible location. This policy ensures that community needs continue to be met and facilities remain available for public use.

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Implementation and Monitoring



Chapter 17. Implementation and Monitoring

Monitoring

17.1. The Local Plan must be deliverable, not just aspirational. Each policy should outline intended outcomes and how success will be measured. To achieve this, the council will monitor and publish the following reports, fulfilling the need for an Annual Monitoring Report.

Housing Monitoring Update (HMU): Tracks housing completions, projections, and land supply. This includes:

- Total net and gross completions by district, parish, settlement, and Built-up Area.
- Breakdown of completions on brownfield and greenfield sites.
- Affordable housing statistics.
- Housing projections for the Local Plan period.
- Five Year Housing Land Supply calculations.
- Housing Delivery Test results.
- Designated Neighbourhood Area Housing Requirement Figures.

Employment Land Review (ELR): Assesses employment land availability and development. It identifies major employment sites and business parks, recording:

- Developed plots and building floorspace.
- Vacant or undeveloped plots suitable for future business development.

Local Economic Review (LER): Provides core economic statistics from Census data, Office of National Statistics datasets, and other evidence. It includes:

- Wages and productivity.
- Unemployment and economic inactivity.
- Employee and job numbers.
- Demographics and wellbeing.

Self and Custom-Build Report: Details demand and supply for self-build plots, including numbers on the council's self-build register and plots granted planning permission.

Brownfield Land Register: Lists suitable brownfield sites for development. To be included, sites must be:

- Suitable for residential development according to Local Plan and NPPF policies.

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- Free from adverse impacts on the natural environment, habitats, or built heritage.
- Viable and deliverable within 5 years.
- At least 0.25 hectares in size or capable of supporting five or more dwellings.
- Available for residential development without ownership or legal constraints.

17.2. Additional monitoring areas include section 106/CIL contributions, heritage strategy, gypsy and traveller sites, neighbourhood plans, and planning appeals.

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Appendix 1 – Local Plan housing trajectory



Appendix 2 – Designated Neighbourhood Area Housing Requirement Figures Breakdown

DESIGNATED NEIGHBOURHOOD AREA	Local Plan Allocations	Adopted Cranbrook Plan Allocations	Neighbourhood Plan* Allocations (without planning permission)	Future Neighbourhood Plan Provision	Completions 01/04/2020 to 31/03/2024	Commitments 01/04/2020 to 31/03/2024	TOTAL DNA Minimum Housing Requirement Figure
All Saints	0	0	0	0	2	0	**2**
Axminster	1,086	0	0	0	212	111	**1,409**
Axmouth	0	0	0	0	1	3	**4**
Aylesbeare	0	0	0	0	2	6	**8**
Beer	0	0	0	0	6	38	**44**
Bishops Clyst (Sowton and Clyst St Mary) #	0	0	0	72	10	87	**169**
Broadclyst	214	90	44	0	1,001	1,033	**2,382**
Broadhembury	10	0	0	0	18	11	**39**
Budleigh Salterton	35	0	0	0	48	49	**132**
Chardstock	30	0	0	0	0	0	**30**
Clyst Honiton #	0	0	9	0	2	0	**11**
Clyst St. George	596	0	0	0	1	2	**599**
Colyton and Colyford	61	0	0	0	27	81	**169**
Cotleigh	0	0	0	0	0	0	**0**

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Dalwood	0	0	0	0	0	2	**2**
Dunkeswell	43	0	0	0	5	24	**72**
East Budleigh with Bicton	22	0	0	0	3	5	**30**
Exmouth	1,305	0	0	0	483	523	**2,311**
Farringdon #	0	0	0	0	2	3	**5**
Feniton	102	0	0	0	16	9	**127**
Hawkchurch	12	0	0	0	3	2	**17**
Honiton	528	0	0	0	167	144	**839**
Kilmington	28	0	24	0	5	2	**59**
Luppitt	0	0	0	0	1	1	**2**
Lympstone	200	0	0	0	11	112	**323**
Membury	0	0	0	0	2	2	**4**
Monkton	0	0	0	0	1	0	**1**
Newton Poppleford and Harpford	55	0	0	0	10	11	**76**
Otterton	10	0	0	0	15	2	**27**
Ottery St. Mary (including Tipton St John)	323	0	5	0	107	48	**483**
Payhembury	15	0	0	0	7	16	**38**
Plymtree	30	0	0	0	3	9	**42**
Rockbeare	0	780	0	0	14	12	**806**
Seaton	284	0	0	0	71	168	**523**
Sidmouth (including Sidford and Sidbury)	215	0	0	0	71	185	**471**
Stockland	0	0	0	0	1	2	**3**
Uplyme	0	0	19	0	13	12	**44**

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Upottery	0	0	0	0	1	2	**3**
West Hill	64	0	0	0	4	2	**70**
Whimple	83	500	0	0	14	14	**611**
Woodbury (including Exton)	311	0	0	0	19	35	**365**
Yarcombe	0	0	0	0	1	5	**6**

Notes:

Figures for projected dwellings associated with the second new community allocation are not included as this information is not yet available.

Local Plan Allocations relates to sites/policy in this Regulation 19 Publication Version of the East Devon Local Plan (2020 to 2042).

Cranbrook Plan Allocations comprise the four Expansion Areas in Policies CB2 to CB5 of the adopted Cranbrook Development Plan Document (2013 to 2031).

*Neighbourhood Plan Allocation refers to sites allocated in a 'Made' or 'Recommended for Referendum' Neighbourhood Plan (as at end December 2025), and where not completed or consented (committed)).

Future Neighbourhood Plan Provision describes agreed dwelling totals to be brought forward in upcoming neighbourhood plans.

Dwellings completed on sites before 01/04/2020 are not included in the figures as they fall outside the Plan Period.

Dwelling completions or commitments (with planning permission) are included in the figures up to the 2024 Monitoring Point (31/03/24).

Further information on the methodology for calculating the housing requirement and more detail on the figures for each DNA can be found

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East Devon Local Plan 2020 to 2042

Regulation 19 Publication Draft
February 2025



East Devon District Council

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2

Foreword

East Devon is an outstanding place.

From the rugged beauty of our Jurassic Coast to the peace and tranquillity of our National Landscapes, we are surrounded by a glorious, thriving natural environment; between the quiet vitality of our towns and the gentle warmth of our historic villages, we share in a proud and welcoming community - and whether in the fierce determination of our farmers, rural workers, and small business owners, the passion and resilience of our tourist industry, or the drive, creativity, and innovation of our high- and green-tech industries in the West End and Enterprise Zone, we benefit from a diverse, resilient, and growing rural economy.

This Local Plan, guiding development in East Devon through to 2042, aims to preserve and enhance these distinctive qualities. While government policy necessitates the allocation of land for housing and employment, our focus remains firmly on ensuring development is balanced, sustainable, and beneficial to our communities. This Plan is underpinned by principles that seek to protect our outstanding landscapes and wildlife while fostering vibrant, inclusive communities.

Key to this vision is our commitment to delivering genuinely affordable housing and implementing strong measures to reduce carbon emissions both during construction and throughout the operational lifespan of new developments. We also aim to exceed government requirements for biodiversity enhancement and set out a comprehensive strategy to support thriving town centres, robust community facilities, and opportunities for local businesses to flourish. By creating spaces that enable residents to live and work close to home, we aspire to make East Devon even more attractive to the industries of the future. We hope this vision delivers as far as we can on what our community has told us is important, and we're grateful to everyone that has participated in the process of developing them – whether through our online consultations, town hall meetings, or by coming in-person to join in discussions.

The creation of a new community between the A30 and A3052—a significant part of this Plan—exemplifies this approach. By consolidating a substantial portion of East Devon's housing needs in this new community, we can deliver the infrastructure and affordable housing that our area urgently requires. This development represents an opportunity to apply the lessons learned from Cranbrook, ensuring the new community is thoughtfully designed, sustainably developed, and well-integrated into the natural environment, with essential services and facilities in place from the outset.

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We recognise there will be challenges in delivering the vision set out by this Local Plan, and that the evolving nature of government policy and the national planning framework may sometimes limit what can be achieved. However, this Plan reflects our steadfast commitment to work within these constraints to deliver the best outcomes for East Devon.

Above all, this Local Plan represents more than a framework for development; it is a pledge to the people of East Devon. It is a commitment to safeguard the exceptional qualities of our district while moving towards a sustainable, inclusive, and prosperous future for all who live, work, and visit here: to make East Devon an even more outstanding place.

Councillor Todd Olive
Portfolio Holder for Strategic Planning



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About this consultation

The local plan has reached the Regulation 19 stage of production and consultation, this is a formal legally prescribed stage of plan making. Consultation starts on insert date February 2025. This will be the first planned phase of Regulation 19 consultation. A second phases of Regulation 19 consultation is planned to run from Spring 2025 through to the early summer (dates to be confirmed). Thereafter the plan will be submitted for examination in Autumn 2025. The submission process involves sending the plan and supporting documents, including comments and representations received, to the Planning Inspectorate who will undertake a plan examination.

The plan in current draft form covers all local plan matters with the exception of full policy details on the new community proposals. Evidence work, as at early 2025, is ongoing in respect of the new community (see specifically Strategic Policy WS01 in this plan) as well as on other inter-related local plan matters. Once this evidence work is completed, and policy gaps in the plan can be filled in, and further policy refinement undertaken, the second phase of consultation will take place.

This second phase of consultation is envisaged to introduce limited new material into the plan, though does provide scope for refinement of new community policy and some minor more general amendments.

A new National Planning Policy Framework (the Government's overarching policy on planning matters) was issued in December 2024. This set out transitional arrangements for local plans to progress under the current plan making regime ahead of legislative changes, a new plan making system, announced for 2025. The new (December 2024) National Planning Policy Framework also allows for local plans to progress and be examined under the National Planning Policy Framework dated December 2023, subject to meeting defined deadlines. This plan, and policies within it, are drafted to accord with the December 2023 National Planning Policy Framework and all references in the plan are to this document, unless specifically stated otherwise. In drafting the plan we have, however, been mindful of the new national guidance and the direction of travel of Government policy.

Comments on all concerns identified should be made at this stage of consultation, this includes in respect of policy WS01, notwithstanding that any such comments, specifically on new community matters, can be elaborated on at the second stage of consultation when more policy detail and supporting evidence will be available

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Introduction



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Chapter 1. Introduction

The role of the local plan

1.1. The primary role of the local plan is to guide and inform decisions on where and how development will take place in East Devon. It forms part of the Development Plan, which is the key basis for determining planning applications.

1.2. The Local Plan, and the Development Plan overall, must be read as a whole to understand complete policy coverage. We have avoided replicating matters in different plan policies where a single policy reference addresses the relevant consideration.

1.3. The East Devon Local Plan covers the period from 1 April 2020 to 31 March 2042. Upon adoption, it will supersede, in their ~~the~~entirety, the East Devon Local Plan adopted in 2016 and the Villages Plan adopted in 2018.

1.4. On adoption this local plan, the Cranbrook Plan, made Neighbourhood Plans and waste and mineral plans produced by Devon County Council will make up the Development Plan for East Devon. This local plan provides planning policy coverage for selected matters within the Cranbrook Plan area. The adopted Cranbrook Plan remains part of the Development Plan[1] and is the primary plan for determining planning applications at Cranbrook. However~~, a limited number of~~ many policies in this new local plan will also apply within the Cranbrook Plan area and should be applied alongside Cranbrook Plan policies which will remain in place as part of the Development Plan. , ~~we will add to plan policies whether they apply at Cranbrook or not – this task is not yet done. No policies in this local plan supersede those in the Cranbrook Plan~~. Where policies in this plan apply to parts of or the whole of the Cranbrook Plan area this is specified in policy, and with the exception of allocation policies that fall outside of the West End as are cases where any policy does not apply.

[1] OTE-001 - Cranbrook Plan DPD 2013-2031,: https://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/adopted-cranbrook-plan-dpd-2013-2031/#article-content

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Commented [A3]: For avoidance of doubt we have stated in plan policies whether they apply, or not, in the Cranbrook Plan area. But unless specifically noted we do not provide specific comment on a policy by policy basis. Note that in previous drafts of this plan there was an appendix, now deleted, that set out whether policies did or did not apply.

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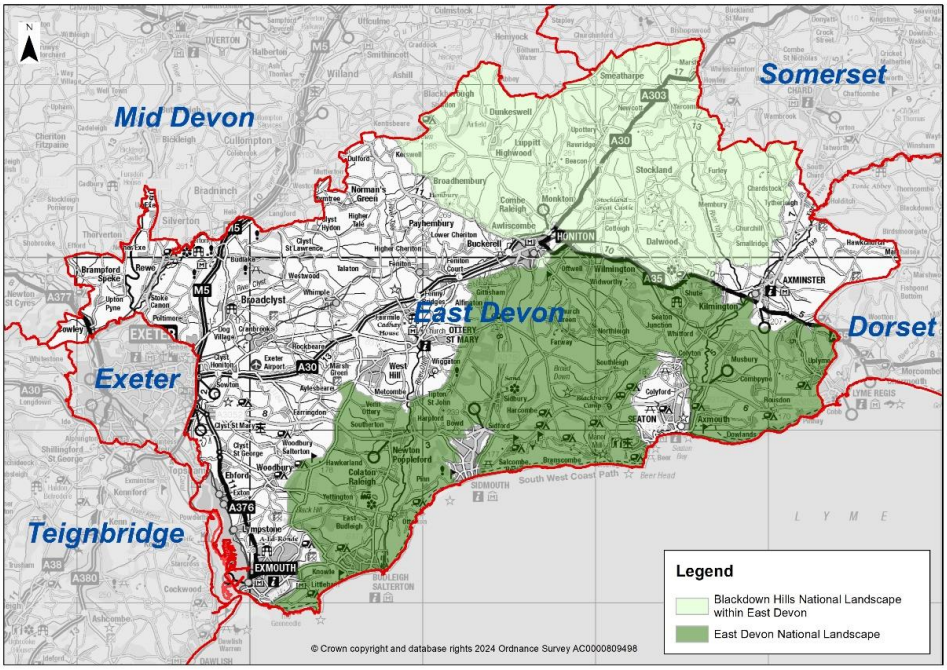


FIGURE 1 East Devon District and neighbouring authorities ~~– map will need updating to reference National Landscapes (AONB). Plus look at bits we colour in grey – add grey for Cranbrook and elsewhere? Note similar map showing Jurassic coast and NL's is needed for landscape chapter~~

Strategic and non-strategic policies and the Policies Map

1.5. The plan differentiates between strategic and non-strategic policies, as advised to do so by the National Planning Policy Framework.

1.6. Strategic Policies set out the overarching approach and deal with major subject matters fundamental to decision-making or setting a general tone.

1.7. Non-strategic policies typically add an extra layer of detail to inform decision-making.

1.8. Strategic policies are denoted with the word 'Strategic' in the title, while all other policies are non-strategic. Neighbourhood Plans and their policies can supersede non-strategic policies but not strategic policies.

1.9. Many policies refer to specific locations or areas defined on the Local Plan Policies Map.[2]

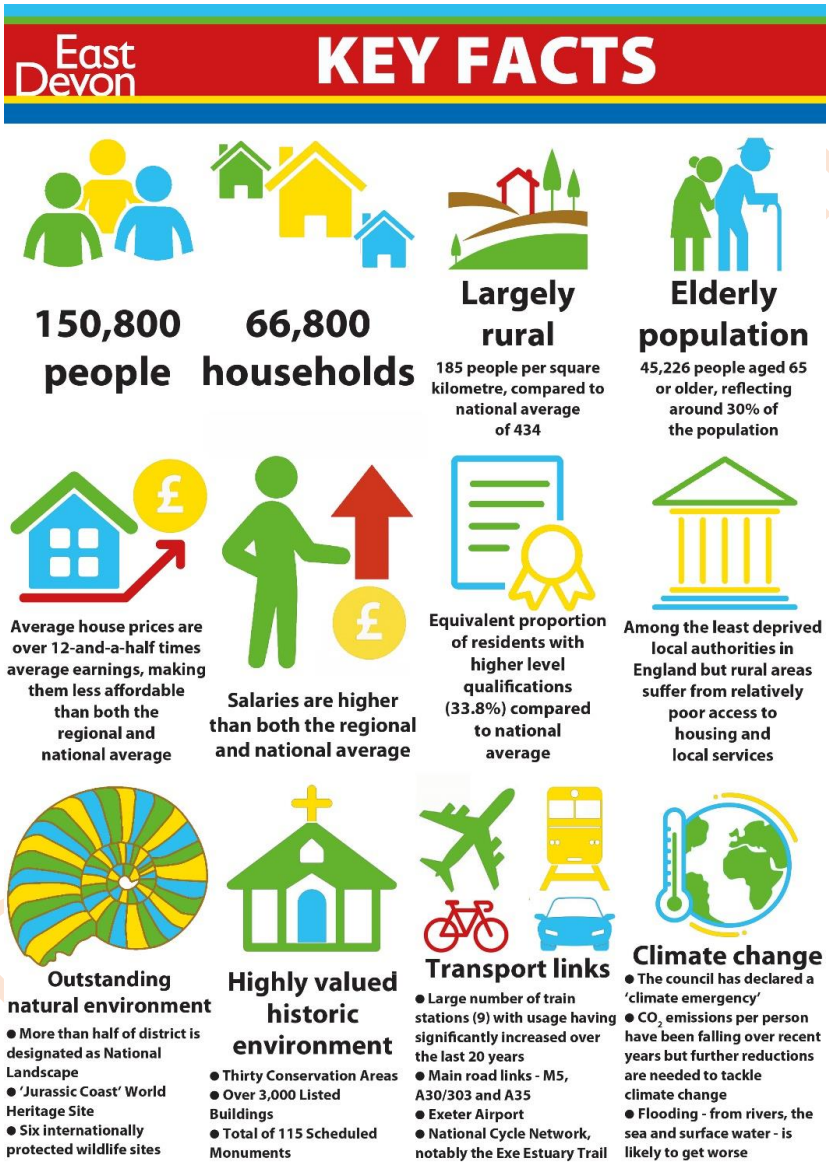


FIGURE 2 Key Facts ~~– the above table will be updated. It could show where we are now (at 2024 or maybe 2020) and where we will be at 2042 in respect of numbers and data.~~

The role of and relationships with neighbouring planning

1.10. Neighbourhood planning is actively supported by the District Council, with 27 made plans at the time of plan Publication. Activity to prepare and review plans is expected to increase with the adoption of the new Local Plan.

1.11. After adoption, neighbourhood plans will be tested for conformity with local plan strategic policies and can add local specificity or supersede non-strategic policies if needed. Once made, they become part of the statutory ~~d~~Development ~~p~~Plan, and development decisions should align with them.

1.12. We encourage developers to consider the aims and policies of relevant neighbourhood plans and engage with local communities at an early stage when preparing planning applications. The new Local Plan will supersede conflicting neighbourhood plan policies but otherwise, existing plans and their policies will remain in effect until replaced.

1.13. Information about neighbourhood plans in East Devon is available on the Council's website.[3]

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[3] OTE-002 - Neighbourhood Plans in East Devon, https://eastdevon.gov.uk/planning/planning-policy/neighbourhood-and-community-plans/neighbourhood-plans/

The Vision



Chapter 2. The Vision

Our local plan vision

2.1. By 2042 and beyond East Devon will be a diverse, inclusive and thriving place to live and work and a pleasure to visit and enjoy.

2.2. In responding to the climate emergency we will continue to play our part in what will be an increasingly net zero carbon world. At a local level we will be operating at net zero carbon, minimising energy consumption and maximising renewable energy generation. Communities in East Devon will be adapting to a changing climate.

2.3. We will ensure our urban areas and towns and villages, as they grow to meet future needs, continue to be great places to live and have better access to the surrounding countryside for all. Looking beyond our boundaries we will need to maintain strong relationships with the adjacent city of Exeter and our other neighbours.

2.4. The western side of East Devon will remain a focal point for growth with Cranbrook now well established and thriving. Our second new community will be a council and corporate led development meeting the needs of a growing population. Alongside additional housing, new high-technology and green businesses will continue to invest in the western side of the district securing high quality jobs and training. This development will come forward in an outstanding environment with the expanded and expansive Clyst Valley Regional Park wrapping around new developments.

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

2.6. Rural East Devon will retain its outstanding charm and character with ~~SP07~~ modest ~~sensitively~~and sensitively planned development to meet the needs of local communities. Farming and rural activities will still dominate the use of land. Where possible we will retain high quality land in agricultural production as we move towards more environmentally sustainable farming practices into the middle decades of the 21st century.

2.7. Across East Devon new development will draw on our outstanding heritage legacy but will also be innovative in design and forward looking to incorporate net zero carbon

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technologies in new buildings and built spaces. Working with partner bodies we will strive to secure better facilities, especially where there may be current deficits in provision, including for schools and medical services. This will include in locations where past housing development has occurred without adequate services.

2.8. New, expanded and improved physical, social and community facilities and infrastructure will be delivered alongside development. This will ensure that people live healthier and happier lives with greater access to services and facilities in a cleaner and greener setting. Sustainable transport links, active travel provision and infrastructure connecting communities will be enhanced and provided alongside development. High quality urban spaces, and our existing towns and built development, will link in with enhanced Green Infrastructure, open space and recreational facilities.

2.9. Our beautiful and diverse countryside, National Landscapes, world class Jurassic coast, nature reserves and built heritage assets will be protected and enhanced. We will ensure that alongside new development there is greater care of the natural world with biodiversity improvements and a far richer and more nature friendly tapestry of green spaces in the future. These will support both nature recovery and the health and well-being of our communities.

2.10. The plan objectives set a framework for the chapters and specifically the plan policies that follow. The objectives are not in a priority order or ranking and no one carries any more or less weight than any other.

TABLE I. Plan Objectives

Designing for health and well-being	Objective 1	To encourage healthy lifestyles and living environments for all East Devon residents.
Tackling the climate emergency	Objective 2	To ensure all new development moves the district towards delivering net-zero carbon emissions by 2040 and that we adapt to the impacts of climate change.
Meeting future housing needs	Objective 3	To provide high quality new homes to meet people's needs.
Supporting jobs and the economy	Objective 4	To support business investment and job creation opportunities within East Devon and support a resilient economy.
Promoting vibrant town centres	Objective 5	To promote the vitality of our town centres, encourage investment, greater flexibility and a wider range of activities to increase footfall and spend.

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Designing beautiful and healthy spaces and buildings	Objective 6	To promote high quality beautiful development that is designed and constructed to meet 21st century needs.
Our outstanding built heritage	Objective 7	To conserve and enhance our outstanding built heritage.
Our outstanding natural environment	Objective 8	To protect and enhance our outstanding natural environment and support an increase in biodiversity.
Promoting sustainable transport	Objective 9	To prioritise walking, cycling and public transport and make provision for charging electric vehicles
Connections and infrastructure	Objective 10	To secure infrastructure needs at an appropriate time to support new development
Supporting sustainable and thriving villages	Objective 11	To help support villages and protect and enhance facilities and services they offer.

2.11. The vision and objectives of the plan, as set out in policies to follow, are captured in the local plan key diagram below.

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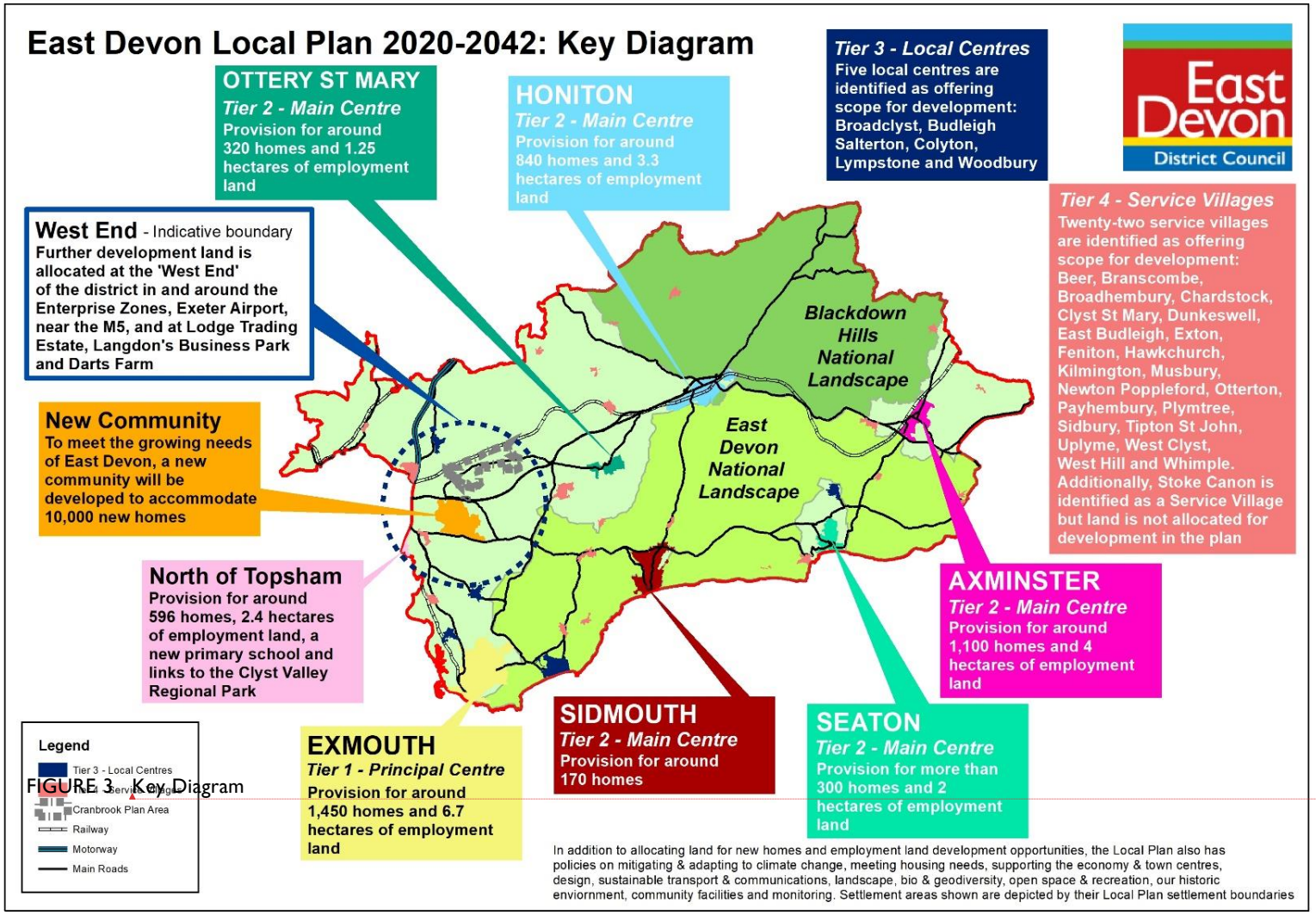


FIGURE 3 Key Diagram

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The Spatial Strategy



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Chapter 3. The Spatial Strategy

Introduction

3.1. The spatial strategy of the local plan is concerned with establishing an overarching picture of the amounts, types and distribution of future development that will be accommodated in East Devon. We set out an overarching strategic policy that addresses these matters.

Strategic Policy SP01: Spatial strategy

New development will be directed towards the most sustainable locations in East Devon, by:

A. Focusing new development at the West End of the district, including a further new community, on-going development of Cranbrook and other major strategic developments close to Exeter. The West End is not a spatially defined policy area with ~~by~~ a line on ~~a~~ the Policies map, rather it is a term that applies to development proposals and site allocations ~~are~~ referred to in this Chapter of the plan.

B. Promoting the most significant development levels, other than at the West End where the highest levels of growth are proposed, at the Principal Centre of Exmouth.

C. Promoting significant development at the Main Centres of Axminster, Honiton, Ottery St Mary, Seaton, and Sidmouth to serve their own needs and that of the wider surrounding areas;

D. Supporting development at the Local Centres of Broadclyst, Budleigh Salterton, Colyton, Lympstone, and Woodbury that meets local needs and those in the immediate surroundings;

E. Allowing limited development at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill and Whimple.

Settlements not listed above, with the exception of ~~Cranbrook and~~ Broadclyst Station which ~~are~~ is addressed through the Cranbrook Plan, are defined as in 'open countryside' for the purposes of the Local Plan. The open countryside definition also

Commented [A4]: Change requested by committee on 11 Dec 2024.

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excludes any location that falls in a defined settlement boundary or any site or area of land that is explicitly allocated or identified in the Development Plan for built development. In the open countryside more restrictive planning policies apply.

This policy applies to all of the Cranbrook Plan area.

Justification for policy

3.2. The Local Plan promotes a sustainable development pattern that aligns growth with infrastructure. The NPPF (paragraph 20) requires strategic policies to set out an overall strategy for place-making, focusing significant development on sustainable locations that reduce travel needs and offer transport choices.[4]

3.3. The NPPF states that in rural areas, housing should enhance or maintain the vitality of rural communities, with policies identifying opportunities for villages to grow and thrive.

~~3.3.~~3.4. ~~Our~~ The spatial strategy creates a carefully considered settlement hierarchy, grouping settlements together where they share similar characteristics in terms of population, employment, and community facilities and services, as outlined below:[5] ~~reflecting each area's characteristics, infrastructure, and service provision. Development is strategically directed to maximise sustainability and local needs.~~[6]

Commented [A6]: Text amended to clarify meaning.

- The 'West End' ~~near Exeter~~: A highly sustainable area that has seen significant development since 2010, with substantial residential growth, employment opportunities, and strong functional links to Exeter. This zone offers extensive infrastructure, proximity to urban services, and efficient transport connections, making it a prime location for strategic development.

[4] National Planning Policy Framework, Dec 2023, paragraph 11a, 20a: ~~National Planning Policy Framework (publishing.service.gov.uk)~~ *link to NPPF on EDDC when uploaded*

[5] GEV-001 - The Role and Function of Settlements, https://democracy.eastdevon.gov.uk/documents/s13843/1a.%20Role%20and%20Function%20of%20Settlements_report_v3%20final%20draft%20for%20SPC.pdf

[6] ~~GEV-001 - The Role and Function of Settlements, 2021: https://democracy.eastdevon.gov.uk/documents/s13843/1a.%20Role%20and%20Function%20of%20Settlements_report_v3%20final%20draft%20for%20SPC.pdf~~

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- Principal Centre - Exmouth: The district's largest settlement, distinguished by its significantly higher population, diverse job market, and comprehensive range of community services and facilities that serve both local and wider regional needs.
- Main Centres - Axminster, Honiton, Ottery St Mary, Seaton, Sidmouth: Settlements with strategic and local facilities that serve both their immediate area and surrounding communities, offering a balanced mix of jobs, services, and growth potential.
- Local Centres: Settlements with reasonable population levels and a smaller but important selection of strategic and local facilities, playing a crucial role in supporting local community infrastructure.
- Service Villages: 23 settlements with good local facilities, providing essential services and infrastructure for their immediate rural areas and supporting more localised, sustainable development.

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3.5. Other settlements have a more limited level of jobs and facilities and, for the purposes of the Local Plan, fall within 'open countryside' where development is restricted to certain circumstances such as rural exception sites, community-led development (for example through a neighbourhood plan), and rural workers dwellings.

~~3.4.~~**3.6.** The spatial strategy~~is~~ promotes a sustainable pattern of development~~approach~~ that balances development needs with environmental constraints, with approximately half of new homes planned ~~for~~ at the West End ~~of East Devon near Exeter~~. The strategy prioritises development in sustainable locations while protecting the district's outstanding open countryside and coastal environment.

Commented [A7]: Text added and amended to provide greater clarity.

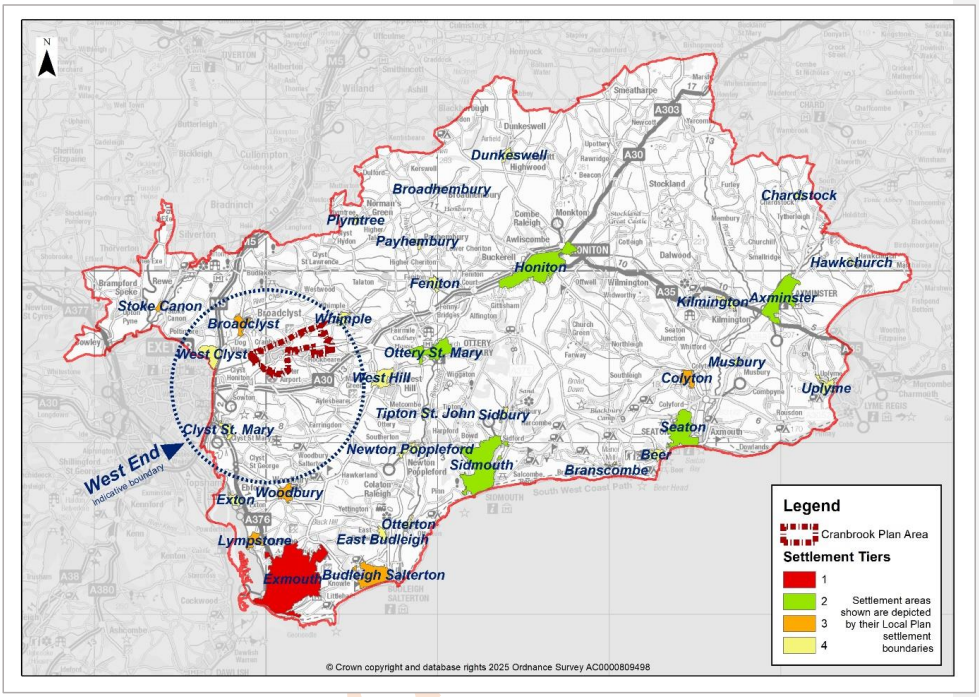
~~**3.5.** The hierarchy ensures development supports local community vitality, particularly in rural areas, by allowing scaled growth that matches each settlement's capacity and characteristics. In open countryside, more restrictive policies apply, with development permitted only in limited, locally justified circumstances.~~

Commented [A8]: Delete paragraph as similar to text above.

~~3.6.~~**3.7.** Policies in later chapters in the plan show where land is allocated for development. The Site Selection methodology explains how sites have been identified, assessed, and chosen for allocation or not.[7] Housing sites have only been considered for allocation where consistent with the spatial strategy set out in Strategic Policy SP01, with slightly more flexibility for the location of employment

[7] SAL-001 – Site Selection Methodology, https://eastdevon.gov.uk/media/3724949/site-selection-methodology-v2.pdf ~~INSERT REF. TO SITE SELECTION METHODOLOGY~~

allocations if they are located in close proximity to existing employment sites. New residential development at Cranbrook is outside the scope of the Local Plan, as it is



addressed in the Cranbrook Plan (adopted October 2022). Therefore, sites within or adjoining the Cranbrook Plan area are not considered for allocation in the Local Plan. ~~Appendix 1 (this is to be produced) sets out a table of all already built, permitted, allocated (in this plan) and predicted windfall development in East Devon from 2020 to 2042.~~

FIGURE 4 Plan showing Principal Centre of Exmouth (Tier 1), ~~and~~ Main Centres of Axminster, Honiton, Ottery St Mary, Seaton, and Sidmouth (Tier 2), Local Centres (Tier 3) and Service Villages (Tier 4). ~~Plan to be updates to show Cranbrook and West End.~~

Levels of future housing provision

~~3.7.~~3.8. Delivering a sufficient supply of homes' is an NPPF policy theme. The NPPF requires Local Plans to identify and meet as a minimum the objectively assessed development needs for their area. The purpose of this strategic policy is to set out what the housing development requirements are for East Devon for

the plan period. This is central to the council's 'plan, monitor and manage' approach to housing development.

Strategic Policy SP02: Levels of future housing development

The Local Planning Authority will plan, monitor and manage the delivery of housing development in accordance with the spatial strategy and the site allocations set out in this plan, and other adopted or made Development Plan Documents in the district, including Neighbourhood Plans.

Housing provision will be made for at least 20,909~~insert final number here~~ dwellings (net) to be delivered in the plan area between 1 April 2020 to 31 March 2042. The housing requirement will be delivered through a stepped trajectory, with an annual target of 850 homes from 2020/21 to 2031/32, increasing to 1070 homes per year from 2032/33 to 2041/42.~~ We have, however, applied a 10% (need to review final % number) headroom flexibility uplift and in this will provide for insert final number here dwellings.~~

This policy applies to all of the Cranbrook Plan area but does not supersede any Cranbrook Plan policies.

Commented [A9]: Matter covered in supporting text

Justification for policy

~~3.8.~~3.9. The policy responds to the Council's priority of addressing housing needs by establishing a clear housing requirement based on the Standard Method using latest ONS statistics. It provides for a minimum number of new dwellings with an added flexibility headroom, supporting the government's objective of significantly boosting housing supply and aligning with the local plan's vision and spatial strategy.

3.10. The housing requirement encompasses an annual housing provision of ~~946~~ 950 dwellings.~~,~~ W~~w~~ith a target of approximately 4,070 affordable dwellings for 2020 to 2040, we have uplifted this figure by 10% to account for the years 2040 to 2042 giving a

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gross total, for 2020 to 2042, of 4,477, which is justified by the latest evidence of affordable housing need[8].

3.11. The Local Plan housing provision follows transitional arrangements set out under the December 2024 redraft of the NPPF. The new standard method generates an annual average housing number (at February 2025) of 1,188~~46~~ dwellings. Providing for 80% of this (para 234 of the December 2024 NPPF) generates the annual average housing level of 950.4 new homes, a 22-year plan requirement of 20,909. Projected delivery from all sources, from a monitoring base position of 1 April 2024 – those already built, those with permission, projected future windfalls and allocations in this plan provide for 22,614 homes. Of these 3,514 have been built which if deducted from gross projections leaves a net delivery of 19,100 and a net need, with the same subtraction, of 17,395. Deducting the net need from net delivery generates a 'surplus' of 1,705, this figure expressed as a percentage of net need gives a healthy headroom surplus of 9.8% that will account for any possible non-delivery.

3.12. In recognition of the complexities inherent in delivering major development sites, particularly the proposed new community provision of new homes will come forward under a stepped trajectory that will provide an annual average of 850 dwellings per year ~~for~~ from 2020/21 to 2031/32 and 1,070 per year from 2032/33 to plan end at 2023/24. A housing technical assessment paper provides more detail on housing numbers and provision.[9]

~~3.9.~~3.13. The housing trajectory is illustrated in Appendix 1~~2~~ as is 5-year land supply forecast at the anticipated point of plan adoption.

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Commented [A10]: Text added to set out details on housing provision and stepped trajectory.

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[8] Based on the scale of affordable housing in Sensitivity Test 3 shown in Figure 57 in: HOU-00~~2~~1 - East Devon Local Housing Needs Assessment: https://eastdevon.gov.uk/media/3724890/east-devon-lhna-final-accessible-160922.pdf

[9] HOU-001 - Housing Delivery Technical Report Jan 2025

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FIGURE 5 New homes at Clyst St George

~~3.10.~~3.14. Detailed evidence supporting this policy can be found in the 2022 Housing Need, Supply and Requirement Interim Topic Paper[10], ~~which is available in the local plan evidence base~~. The local plan housing supply will provide for a level of workers, given job growth assumptions in the plan, that aligns with the future workforce that housing will accommodate. Assessment is set out in a Jobs and Workers Balance Assessment[11] (noting there would be a surplus of workers at the sub-regional level).

Commented [A11]: Text added to advise of there being an appropriate balance between future job numbers and housing to accommodate workers.

[10] KSD-~~009~~ 010 - 2022 Housing Need, Supply and Requirement Interim Topic Paper: https://eastdevon.gov.uk/media/3724865/htp-east-devon-housing-need-supply-requirement-interim-topic-paper.pdf

[11] ECN-010 - East Devon, Exeter, Mid Devon and Teignbridge Local Housing Needs Assessment: Jobs and Workers Balance Assessment – https://eastdevon.gov.uk/media/nluaf5ws/ecn-010-jobs-and-workers-balance-assessment.pdf ~~document to be uploaded and web link to be inserted~~

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FIGURE 6 Homes under construction.

Housing requirements in Designated Neighbourhood Areas

~~3.11.~~3.15. This strategic policy establishes housing requirements for the 42 currently Designated Neighbourhood Areas (DNAs) in East Devon, in line with government policy. It provides a framework for neighbourhood planning~~housing development~~ that reflects the district's spatial strategy for housing development, ~~ensuring balanced growth across different communities~~.

Commented [A12]: Amended for clarity as the figures are solely providing a framework for neighbourhood plans in their consideration of housing matters (giving a factual presentation of housing from the various supply sources by the geography of existing designated Neighbourhood Areas, that embodies the spatial strategy and site allocations set out in other policies in the plan.)

Strategic Policy SP03: Housing requirement by Designated Neighbourhood Area

Housing requirement figures for Designated Neighbourhood Areas for the purposes of neighbourhood planning are as follows: ~~Note, however, that the numbers in the policy are subject to final checking and possible consequential amendments.~~

~~This policy applies to all of the Cranbrook Plan area.~~

Commented [A13]: The figures have now been checked and finalised for Reg 19. Consequential amends are shown and explained below.

Commented [A14]: (this is moved to the end of the policy)

Designated Neighbourhood Area (as of December 2024, in alphabetical order)	Total (minimum) Housing Requirement (01/04/20 to 01/04/42) - All ~~known~~ supply sources (completions, commitments, ~~and~~ DPD allocations~~,~~ (Cranbrook, Local Plan (excluding second new community)*, and neighbourhood plans)	Minimum Contribution from Emerging/future Neighbourhood Plans (not Made or Recommended to Referendum at December 2024) ~~Minimum Residual Housing Requirement (Provision through emerging/future Neighbourhood Plan)~~
All Saints	2	0
Axminster	1,4094	0
Axmouth	4	0
Aylesbeare	8	0
Beer	44	0
Bishops Clyst* (Clyst St Mary and Sowton)	169	72
Broadclyst	2,382	0
Broadhembury	39	0
Budleigh Salterton	13282	0
Chardstock	30	0
Clyst Honiton*	11	0
Clyst St George	599	0
Colyton and Colyford	169	0
Cotleigh	0	0
Dalwood	2	0
Dunkeswell	72	0

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Commented [A15]: Amended to make it clearer that the figure of 72 at Bishops Clyst is part of the total, and not additional to it.

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Commented [A16]: Updated allocation from 5 to 10 homes to align to final figure in Policy SD02.

Commented [A17]: Amended to reflect removal of Site Budl_01 as agreed at SPC 11/12/24

East Budleigh with Bicton	30	0
Exmouth	2,3411	0
Farringdon*	5	0
Feniton	127	0
Hawkchurch	17	0
Honiton	839	0
Kilmington	59	0
Luppitt	2	0
Lympstone	323227	0
Membury	4	0
Monkton	1	0
Newton Poppleford	76	0
Otterton	2735	0
Ottery St Mary	483	0
Payhembury	38	0
Plymtree	42	0
Rockbeare	806	0
Seaton	522	0
Sidmouth (Sid Valley)	471	0
Stockland	3	0
Uplyme	44	0
Upottery	3	0
West Hill	70	0
Whimple	611	0

Commented [A18]: Correction to remove site Lymp_07 from Exmouth DNA and correctly show it within Lympstone DNA.

Commented [A19]: Correction to include Lymp_07 associated with growth of Exmouth to the correct DNA of Lympstone as noted above, and to amend site allocation at site GH/ED/73 from 46 to 42 to reflect recent planning approval.

Commented [A20]: Amended to reflect removal of site Otto_02 as agreed at SPC 11/12/24

Woodbury	3656	0
Yarcombe	6	0

These figures represent the minimum ~~of~~ housing development in each of the Designated Neighbourhood Areas over the plan period. Proposals for additional housing, including through allocations in neighbourhood plans to meet a specific local need will be supported where they are in accordance with other strategic policies in this Plan and supported by appropriate evidence. For future new (and/or amended) Designated Neighbourhood Areas (noting some parts of East Devon are currently not designated), the Local Planning Authority will provide an indicative figure, if requested to do so by the neighbourhood planning body.

A breakdown of the total housing requirement by supply category is given in Appendix 2~~3~~.

This policy applies in the Cranbrook Plan area, specifically to the parts of the Cranbrook Plan area that form parts of the above listed designated neighbourhood areas.

Commented [A21]: Correction to align to data 2024 data for completions and commitments.

Commented [A22]: Text moved from below, where it is deleted, to be included in the policy itself.

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~~**3.12.** These figures represent the **minimum** expected scale of housing development in each of the Designated Neighbourhood Areas over the plan period. Proposals for additional housing, including through allocations in neighbourhood plans to meet a specific local need will be supported where they are in accordance with other strategic policies in this Plan and supported by appropriate evidence. For future new (and/or amended) Designated Neighbourhood Areas, the Local Planning Authority will provide an indicative figure, if requested to do so by the neighbourhood planning body.~~

Justification for policy

Commented [A23]: Amendments throughout this section all made for clarity and logical ordering of the points being articulated..

~~**3.13.**~~**3.16.** The housing requirements included in this policy are calculated using a comprehensive methodology that accounts for housing completions, existing commitments, and site allocations from development plans to show the expected scale of housing development over the plan period. They~~Neighbourhood areas will have specific housing provisions that~~ contribute to the district's overall housing provision requirements and strategy. It gives the figures for all parts of East Devon that currently have designated Neighbourhood Areas and provides a basis for doing so on request for other areas, as required to support neighbourhood planning. ~~These figures represent net new dwellings, allowing for units lost to demolition or conversion.~~

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~~3.14.~~3.17. The policy is designed to provide clarity and flexibility for local communities. The housing figures are minimum requirements, not maximum limits, allowing for potential further windfall development where it accords with other policies in the plan and enabling neighbourhood plans to allocate additional sites and~~or~~ exceed the specified numbers. Neighbourhood planning bodies are encouraged to consider making site allocations ~~(with the exception of Bishops Clyst – see Policy SD14),~~ and there may be advantages in doing so, but ~~though~~ there is no mandatory obligation ~~to do so~~. Similarly, there is no obligation for neighbourhood plans to address any shortfall that may arise~~.~~

~~3.15.~~3.18. ~~Key considerations include: h~~Housing supply figures are~~is~~ based on the 2024 monitoring point (to 31st March 2024) and ~~. These figures~~ represent net new dwellings, allowing for units lost to demolition or conversion. Housing numbers related to the second new community are not included as they are not available by individual Neighbourhood Area.~~windfall developments are not included in individual DNA calculations, and the local planning authority will support communities in their planning efforts. The approach balances district-wide housing needs with local community aspirations.~~

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~~3.16.~~3.19. In addition to that given in Appendix ~~3~~2, ~~A~~a more detailed breakdown of housing requirements for each Neighbourhood Area[12], ~~-~~is available on the East Devon District Council website. Monitoring ~~and~~ will be undertaken~~pdated~~ annually through the Housing Monitoring Update[13]. The local planning authority will support communities in considering the need for, and scope and content of, new or reviewed neighbourhood plans in applying and monitoring this policy.

Policy for employment provision and distribution

~~3.17.~~3.20. This section outlines the local plan's economic strategy and employment policy approach, focusing on creating a resilient, sustainable, and inclusive economy for East Devon. The approach aims to support economic growth while addressing key challenges such as low wages, changing workforce dynamics, and the transition to a net-zero economy.

[12] HOU-014 – Detailed Tables of DNA Housing Requirements by DNA, *link when published*
[13] KSD-003 – Annual Monitoring Report, https://eastdevon.gov.uk/planning/planning-policy/monitoring/

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~~3.18.~~3.21. The strategy emphasises supporting innovation, attracting new sectors, and modernising existing industries. Key priorities include fostering transformational sectors, supporting local businesses, and creating opportunities for well-paid, productive careers. Particular attention is given to emerging technologies, green industries, and adapting to changes like increased homeworking and artificial intelligence.

~~3.19.~~3.22. The plan recognises significant economic challenges, including the loss of major employers, lower-than-average wages, and demographic shifts with an ageing population. It seeks to address these by promoting economic diversification, supporting new communities ~~like Cranbrook~~, and ensuring land and infrastructure are available to support business growth and innovation.

~~3.20.~~3.23. Central to the strategy is a commitment to sustainable development, balancing economic prosperity with environmental protection and social well-being, while preparing for future economic and technological transformations.

~~Policy for employment provision and distribution~~

Commented [A24]: Heading moved as preceding text didn't make sense without a section heading

~~3.21.~~3.24. To support job opportunities and business growth, the local plan must ensure a strategic approach to employment provision and land supply. Employment allocations are shown on the Policies Map. For information purposes other significant employment sites[14] are also identified but this is not a comprehensive list of all areas to which employment policies will apply.

Commented [A25]: Additional text added to clarify the information shown on the Policies Map

Strategic Policy SP04: Employment provision and distribution strategy

The Council is committed to achieving high quality, high value jobs in East Devon, close to people's homes. Employment provision will consist of:

A. Sites allocated in this plan (not at new communities) – ~~XXX~~ 90.66 hectares ~~TBC~~
B. Sites at Cranbrook – 19.2ha ~~18.40ha~~
C. Sites at 2nd new community (up to 2042) – around 17.5ha
D. Sites built 2020-2024 – ~~XXX~~ 6.8ha ~~TBC~~

[14] These sites are identified in: ~~the~~ ECN-004 - -2023 Employment Land Review, https://eastdevon.gov.uk/media/di2lpadk/employment-land-review-2021-23-published.pdf

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E. Sites with planning permission or under construction at 2024- 44ha ~~Total – XXX~~

F. Total- 178.16ha ~~Sites with planning permission or under construction at 2024 – 44ha~~

~~F.~~G. In addition, windfall sites are likely to come forward in accordance with other plan policies

This level of provision gives range and choice when measured against a quantified forecast need of 80 hectares set out in the Economic Development Needs Assessment[15] (mid-point clean growth scenario) and ongoing monitoring work.

Employment uses will include:

E(g)(i) Office use - to be primarily located in the town centres of tier 1 and 2 settlements and the proposed new community. Office use will be permitted on site allocations as an ancillary part of other business uses.

E(g)(ii) Research and Development and **(iii) industrial use** (which can be carried out in any residential area without causing detriment to the amenity of the area)- will be met through employment site allocations, alongside larger housing developments as allocations and as windfall development.

B2 General Industrial use - the majority of this provision will be met through site allocations in the West End.

B8 Storage and Distribution use - the majority of this provision will be met through site allocations in the West End.

Other employment generating development, such as sustainable green rural tourism and leisure development will be permitted in accordance with other Plan Policies.

Existing employment areas that will continue to be the primary locations for industrial, warehousing, offices, distribution development and other B Class Uses are identified on the Policies Map. Employment site allocations are identified on the Policies Map and will be subject to site specific Policies in the plan.

This policy applies to all of the Cranbrook Plan area.

[15] ECN-001 Greater Exeter Economic Development Needs Assessment, ~~2023:~~ https://eastdevon.gov.uk/media/flflexie/greater-exeter-edna-final-report-combined-v2-0.pdf

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Justification for policy

~~3.22.~~3.25. The Council Plan and Economic Development Strategy highlight that a resilient economy promotes prosperity and reduces hardship. This policy ensures adequate employment development for the plan period, meeting the needs of new and growing businesses, locating quality jobs near communities, and collaborating with partners to supply quality employment spaces.

~~3.23.~~3.26. The EDNA evaluates East Devon's employment land needs for 2020-2040, focusing on offices, industry, and warehousing. It concludes a need for 7 ha of land for offices, 65 ha for industrial use, and 8 ha for logistics. These fall under Use Classes B2, B8, and E(g).

~~3.24. As of November 2022, the estimated demand was 506,163 sqm for industrial uses and 2,267 sqm for offices, with available floorspace at 4,913 sqm (industrial) and 11,908 sqm (offices). Remaining demand is expected to be met through developments already planned or under construction at 2024.~~

Commented [A26]: This complicates the narrative without adding anything particularly useful

~~3.25.~~3.27. The Plan allocates suitable sites to meet employment floorspace requirements, offering flexibility and choice. Most sites support mixed B2, B8, and E(g) uses, except in residential areas where general industry and warehousing/logistics are restricted to protect local amenity.

Policy reference and address	Uses permitted	Amount of employment land (ha)
Allocations in the West End		
Strategic Policy WS01: Development of a second new community east of Exeter (up to 2042- with a further 30ha post 2042)	Not Specified	~~TBC~~17.5
Strategic Policy WS04: Land north of the Science Park (Brcl_23)	E(g)(iii)	2
Strategic Policy WS06: Employment land to the east of the airport buildings (Site GH/ED/43, GH/ED/45 and Rock_09a)	B2, B8, E(g)	24.34
Strategic Policy WS07: Employment land north of the Airport, adjoining Treasbeare (Clho_09)	B2, B8, E(g)	15.3
Strategic Policy WS08: Employment land opposite the airport buildings, south of the A30 (site Farr_01)	B2, E(g)	1
Strategic Policy WS10: Development next to the M5 and north of Topsham	Not specified	2.4

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Policy reference and address	Uses permitted	Amount of employment land (ha)
Strategic Policy WS12: Employment land at Sandygate, between the M5 and Clyst Road (site Clge_07)	B2, E(g)	0.7
Strategic Policy WS13: Employment land at Lodge Trading Estate, Station Road, Broadclyst (site Brcl_27a)	B2, E(g)	1.89
Strategic Policy WS14: Employment land south of Langdon's Business Park, Clyst St Mary (site Sowt_15a)	B2, B8, E(g)	1
Strategic Policy WS15: Employment land at Darts Farm (Clge_23 and Clge_25a)	E(g)	2.13
Allocations at Tier 1-2 Settlements Note - land is not allocated at Sidmouth as a large employment site already has an extant planning permission		

Strategic Policy SD01: Exmouth and its future development:		
Land to the South of Littleham (Exmo_17)	E(g)	1.6
Land directly to the East of Liverton Business Park (Exmo_18)	B2, B8, E(g)	2.7
Land at St John's (Exmo_20b)	E(g)(iii)	2
Land at Courtlands Cross (Lymp_07)	E(g)(iii)	0.4

Strategic Policy SD02: Axminster and its future development:		
Prestaller Farm, Beavor Lane (Part of GH/ED/80)	E(g)(iii)	1
Land west of Chard Road (GH/ED/83)	E(g)(iii)	0.8
Land west of Musbury Road (Axmi_01a)	B2, B8, E(g)	2
Land east of Musbury Road (Axmi_02 and Axmi_08)	E(g)(iii)	0.6
Land at Axminster Carpets (Axmi_07)	E(g)	Up to 0.5
Great Jackleigh Farm (Axmi_09)	E(g)	1
Land east of Lyme Close (Axmi_11a)	E(g)	0.4

Strategic Policy SD03: Honiton and its future development:		
Land on the western side of Hayne Lane, Gittisham (Gitti_03)	B2, B8, E(g)	5.5
Land to the West of Combe Garden Centre, Gittisham (Gitti_04)	B2, B8, E(g)	9.1
Employment Land within the Existing Heathpark Industrial Estate- plots 11A,11B,11D and 11M	B2, B8, E(g)	3.3

Strategic Policy SD04: Ottery St Mary and its future development

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Barrack Farm (Otry_01b)	E(g)(iii)	1.25
Strategic Policy SD05: Seaton and its future development:		
Land off Harepath Road (Seat_05)	E(g)	2.2
Allocations at the Tier 3 and 4 Settlements		
Strategic Policy SD07: Development at Broadclyst (Brcl_12)	E(g)	0.6
Strategic Policy SD17: Development at Feniton (Otry_20)	B2, B8, E(g)	4.64
Strategic Policy SD18: Development at Hawkchurch (Hawk_01)	E(g)	0.25
Strategic Policy SD20: Development at Musbury (Musb_01a)	E(g)(i)	0.06

~~3.26.~~3.28. The policy ensures sufficient employment land is allocated to support economic growth. The Council will monitor and seek to maintain an appropriate mix of uses throughout the plan period.

~~3.27.~~3.29. West End employment sites and new communities support high-value jobs and strategic inward investment, especially in emerging technology sectors. Employment growth at Tier 1-4 settlements aims to meet local needs and improve self-containment. New jobs will be required alongside new housing on larger development allocations.

Settlement Boundaries

~~3.28.~~3.30. Settlement boundaries are essential for identifying areas suitable for development. They serve three main purposes:

- Define where development is acceptable to promote sustainable development.
- Control the scale and location of development to implement the plan strategy.
- Prevent unregulated development in the countryside and open areas.

Strategic Policy SP05: Development inside Settlement Boundaries

Within the settlement boundaries defined on the Policies Map development will be supported in principle. This does not mean that all development will be acceptable

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within settlement boundaries: proposals will be considered on their own merits having regard to other policies in this plan and any made neighbourhood plan.

This is a strategic policy and significant changes to the boundaries defined through neighbourhood planning would be incompatible with it. However, neighbourhood plans that propose modest adjustments to the settlement boundaries to increase the opportunities for additional development are likely to be compatible with this policy.

This policy does not apply in the Cranbrook Plan area noting that P~~p~~lan has defined Built-up Area Boundaries and associated plan policy.

Justification for policy

~~3.29.~~3.31. Settlement boundaries direct growth to areas that align with our plan objectives, providing clarity on where development is likely to be acceptable. This offers certainty to decision makers, local communities, landowners, and developers.

~~3.30.~~3.32. Settlement boundaries have been established around Tier 1 to Tier 4 settlements (excluding Stoke Canon which is wholly in flood zones 2 and 3). Large strategic development sites may also have boundaries or clear allocations for development. The Settlement Boundaries ~~Evidence~~ Topic Paper (KSD-01~~2~~1)[16] details the rationale for their delineation.

~~3.31.~~3.33. These boundaries help manage growth patterns in line with national planning guidance, guiding but not stifling outward growth. Some built-up areas may be excluded from these boundaries if deemed inappropriate for additional development. Outside settlement boundaries, development is more restricted under separate plan policies.

Land outside of settlement boundaries

~~3.32.~~3.34. East Devon is predominantly rural, renowned for its outstanding natural environment. Our strategy directs growth to the new communities and Tier 1 to Tier 4 settlements, aligning with the National Planning Policy Framework

[16] KSD-011 – Settlement Boundary Topic Paper, *Link when published*

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(NPPF) to promote sustainable development. This approach ensures development is concentrated in areas with existing infrastructure and services

Strategic Policy SP06: Development beyond Settlement Boundaries

In locations outside of the defined settlement boundaries development will not be permitted unless it is in accordance with a specific Local or Neighbourhood Plan policy that explicitly permits such development.

This policy applies in the Cranbrook Plan area for all locations that fall outside of the Built-up Area Boundaries set out in the Cranbrook Plan.

Justification for policy

~~3.33.~~3.35. This policy is crucial for implementing the local plan strategy, managing growth in line with national planning policy. By focusing development within defined settlement boundaries, we promote sustainable development patterns and limit inappropriate development elsewhere. This helps to maintain the character and quality of East Devon's rural areas and natural landscapes.

~~3.34.~~3.36. Settlement boundaries provide clarity and certainty for decision makers, local communities, landowners, and developers about where development is likely to be acceptable. This policy supports the strategic focus on sustainable growth while balancing the needs of rural communities for appropriate development opportunities.

~~3.35.~~3.37. Land outside settlement boundaries is treated as 'countryside' in planning terms, even if it includes built-up areas. Such areas are generally unsuitable for development unless explicitly permitted by separate policy in the plan. This approach allows for flexibility to meet specific needs, such as affordable housing to address local needs or the conversion of existing buildings, while ensuring that development is controlled and sustainable. This balance is essential to protect the rural character and environmental quality of East Devon while accommodating necessary growth.

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Infrastructure

~~3.36.~~3.38. Effective infrastructure delivery is crucial for supporting new development and ensuring the well-being of the wider community. This policy outlines the requirements for infrastructure provision in new development proposals.

Strategic Policy SP07: Delivery of infrastructure

New development proposals must be supported by appropriate infrastructure, delivered in a timely manner to support the needs of the development and the wider community. Applications will be required to:

A. Assess the infrastructure requirements arising from their development.

B. Provide or contribute towards necessary infrastructure improvements, either through direct provision or financial contributions.

C. Ensure that infrastructure to be delivered by the development is delivered in parallel with the progress of the development.

D. Coordinate with relevant service providers and the Local Planning Authority to ensure efficient and effective infrastructure delivery.

E. Consider the long-term maintenance and management of new infrastructure.

Where appropriate, the Council will use planning conditions or planning obligations to secure the provision of infrastructure and its ongoing maintenance.

This policy applies in the Cranbrook Plan area noting that the Cranbrook Plan also sets out Cranbrook bespoke requirements.

Justification for policy

~~3.37.~~3.39. Proper infrastructure provision is essential for creating sustainable communities that meet the needs of residents and businesses. Adequate infrastructure supports a high quality of life and ensures access to essential services and amenities.

~~3.38.~~3.40. Well-planned infrastructure attracts investment and supports economic growth. It also helps mitigate environmental impacts, such as through sustainable drainage systems or green transport options.

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~~3.39.~~3.41. The East Devon Infrastructure Delivery Plan (IDP)[17] provides a comprehensive assessment of the district's infrastructure needs and priorities. Developers should consult the most recent version of the IDP when assessing infrastructure requirements for their proposals.

~~3.40.~~3.42. This policy aligns with the National Planning Policy Framework (NPPF) requirements for plan-making and the use of planning obligations. By requiring developers to contribute to infrastructure needs, the policy ensures that the cost of supporting growth does not fall disproportionately on existing communities.

3.43. A coordinated approach to infrastructure delivery is encouraged, promoting collaboration between developers, the local authority, and service providers. Considering the long-term maintenance of infrastructure helps ensure the ongoing viability and effectiveness of new facilities and services.

3.44. Additional homes create the need for additional education provision including primary and early years, secondary and special education need school paces. There are also implications for home to school transport. This education impact of development must be fully mitigated by financial contributions in order for development to be acceptable in planning terms

~~Additional homes create the need for additional education provision including primary and early years, secondary and special education need school paces. There are also implications for home to school transport. This education impact of development must be fully mitigated by financial contributions in order for development to be acceptable in planning terms.~~

Infrastructure Provision

3.45. Delivering infrastructure alongside housing and economic development is crucial for sustainable communities. This includes essential services like transport, flood risk measures, utilities, and habitat mitigation, as well as daily access to education, health, open spaces, and play areas.

[17] KSD-001 – Infrastructure Deliver Plan, *Link when Published*

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Commented [A27]: Additional words added following discussion with Devon County Council. Noting relevance and importance attached to education matters.

Commented [A28]: Move para 16.1-3 to SP07 justification.

Commented [A29R28]: Moved the section on infrastructure next to its relevant policy

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3.46. Infrastructure funding can come from various sources:

- **Direct Provision by Developments**: New developments must address their direct impacts by providing or funding necessary infrastructure.
- **Planning Obligations (Section 106 Agreements)**: Legal agreements where developers contribute to infrastructure.
- **Community Infrastructure Levy (CIL)**: A charge on new developments collected for future infrastructure projects.
- **Government Grants or Loans**: Funding from national or local government.
- **Utilities Companies and Central Government**: Funding from statutory organisations and central government for specific projects like flood protection.

3.47. As the local plan progresses, detailed assessments of infrastructure needs and provision plans will be required.

Phased Delivery of Infrastructure and Services

3.48. Developments are often built out in phases by different developers and require co-ordination between them to ensure their timely and co-ordinated delivery.

Strategic Policy SP08: Phased Delivery of Infrastructure and Services

Developments that are being brought forward in phases or parcels by multiple developers must be designed so that each phase or parcel provides pedestrian, cycling and vehicular access up to the boundaries of each development parcel/phase. Such developments shall also ensure that all services including electricity, water, sewerage, broadband and district heating services (where applicable) are also delivered up to the boundaries of each phase or parcel.

Delivery of services shall be co-ordinated with providers to ensure that adequate capacity can be provided to service future phases/parcels without the need for retrofitting.

The pedestrian, cycling and vehicular access links and services must be built to adoptable standards (and included in agreements under s38 of the Highways Act 1980 where they are to be adopted by the highway authority). Services must be built to regulatory standards and details of appropriate mechanisms for in perpetuity management and maintenance, with adoption by a regulatory body being the preference, will be subject to the agreement of the local planning authority.

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The delivery of these links and services shall be in accordance with any masterplan and phasing plan for the overall development (unless otherwise agreed) and will be secured in s106 agreements to ensure that they are provided in a timely manner.

This policy will apply in the Cranbrook Plan area noting that the Cranbrook Plan also sets out Cranbrook bespoke requirements.

Justification for policy

~~3.41.~~3.49. It is important to ensure that both above and below ground services and infrastructure link up between different parcels of phased developments to ensure that no party is held to ransom by another at the expense of the quality of the development. This policy seeks to ensure that adequate links between parcels are provided, in the interests of facilitating a comprehensive movement network and to avoid unnecessary delay, cost, retrofitting and disruption in the delivery of adjoining phases or parcel.

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Development at the West End



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Chapter 4. Development at the West End

4.1. The West End of East Devon, near Exeter, has seen significant development recently. This local plan continues to support high growth in this area, with projects including district heating, green infrastructure, the Growth Point programme, the Enterprise Zone, improved highways, and climate emergency responses. Past policies focused on this area due to development constraints in other parts of East Devon, with much of the district in designated National Landscapes. The existing built environment near Exeter provides jobs, services, infrastructure, and market demand for housing and employment development. These factors remain relevant, with much future development already planned or underway, particularly at Cranbrook. The West End, and its growth, will provide economic and job benefits, including in respect of enhancing skill levels and education and training, for all of East Devon and a wider area.

4.2. Continued growth in the West End will ~~leverage~~ make use of existing infrastructure and necessitate provision of additional facilities, especially for the second new community. The 'West End' is not defined by a map line but refers to development proposals and sites ~~discussed~~ referenced in this chapter.

The ongoing development and potential for expansion of Cranbrook

4.3. Cranbrook is a new community under construction on the western side of East Devon, about 5 km from the M5 Motorway and Exeter City boundary. Since starting from a green field in 2011, it has grown to around 3,000 homes by the end of 2024. The Cranbrook Plan includes policies to expand the town to nearly 8,000 homes.

4.4. Cranbrook will continue to develop under the adopted Cranbrook Plan, with selected policies from this local plan also applicable. The Cranbrook Plan has an end date of 2031, and a new plan will supersede it before then.

~~4.2.~~

Planning for a second new community

~~4.3.~~4.5. To accommodate significant housing growth, the local plan allocates land for a new community ~~in~~ at the West End~~, near Exeter~~. Extensive

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research and assessment have identified and allocated a site for the new community, shown on the Policies Map.



~~FIGURE 7 – New houses at Cranbrook~~

~~4.4.~~4.6. In technical assessment work ~~East Devon Options Appraisal Report.pdf~~East Devon Options Appraisal Report[18] there is a vision of the new community, this states:

A second new community in East Devon with a self-sufficient, healthy and dynamic community with distinctive character. Delivering up to 8,000 high-quality homes with a range of tenures, places of work and a diverse mix of uses that are easily accessible via sustainable and active travel such that these become the dominant transport modes.

This new community will be more than just a settlement, it will be an ambitious and highly desirable place that supports the growth of a self-governing and self-sustaining community that establishes its culture at the outset in order to develop and thrive into the future.

The structure of the settlement will promote innovative design that will draw inspiration from the local context, including the unique surrounding historic environment, to create a rich

[18] GEV-003 - East Devon – Options appraisal for a potential new settlement, https://eastdevon.gov.uk/media/ff1fcr4s/gev-003-a-options-appraisal-for-a-potential-new-settlement.pdf

character. Streets and spaces will be designed to encourage social interaction and will be embedded in a well-connected and integrated active travel network with comprehensive links to nearby employment, surrounding countryside and the city of Exeter.

It will be underpinned at its core by sustainability, wellbeing, and healthy living, creating an exemplar zero-carbon town both in terms of self-sufficiency and design and by doing so it will provide a legacy to the benefit of future generations.

This sustainable community will be sensitively and seamlessly integrated with the outstanding East Devon natural environment and contribute to the delivery of the Clyst Valley Regional Park whilst protecting nearby internationally recognised habitats.

It will provide a rich network of substantial open space and diverse landscaping, including areas of enhanced ecology and biodiversity, as well as opportunities for play, recreation and opportunities for food growing.

This vibrant and adaptable new community will preserve East Devon's legacy as an outstanding place to live. The use of local materials and labour will be promoted to deliver on local priorities, creating somewhere residents can be proud of and where people of all ages and lifestyles will prosper.

Strategic Policy WS01: Development of a second new community east of Exeter

To meet the needs of a growing population a new community will be developed on the ~~eastern~~ western side of East Devon. The new community will be a long-term strategic development scheme that will start being built during the life span of this local plan but development will extend beyond the life of this plan.

Ultimately the new community will need to accommodate at least 10,000 new homes and associated mixed use development and infrastructure. In the first instance, the land allocated in this plan further to this policy is for the new community to accommodate at least 8,000 new homes, some to be completed before 2042 and some after. The further land to be allocated to accommodate ~~further~~ greater housing numbers and associated mixed use development and infrastructure so the new community can accommodate at least 10,000 new homes will be determined through further work and be set out in subsequent development plans.

For the first 8,000 new homes, and supporting facilities and development, land is allocated, as shown on the Policies Plan. This policy sets out requirements to get to

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this scale of development but all planning and infrastructure capacity and needs work for the new community should take into account accommodating greater levels of development, to accommodate at least 10,000 new homes and associated development.

Development will need to occur and proceed on the basis of an agreed whole new community masterplan and on an agreed phased basis. The new community will be built to distinctive high quality design standards with an explicit focus on sustainable construction and building operation and renewable energy production and use. Open spaces and facilities will be readily accessible to all residents with convenient and attractive pedestrian and cycle links within the site and to local destinations and access to high quality public transport services.

Working with our partners we will promote development starting in this plan period but also extending over the longer term (beyond the lifespan of this local plan) to accommodate the following:

New homes

Up to 2042 - Around 3,300 new homes on allocated land.

Beyond 2042 – Around 4,700 additional new homes on allocated land.

Noting that at least a further 2,000 new homes and associated development will also be required to be accommodated in the longer term to be allocated in subsequent development plans.

New homes will need to be of the highest standards in terms of energy and resource efficiency, quality of design and access to services and facilities while making efficient use of land.

The allocation-wide Masterplan will set out the required levels of affordable housing, mix and size of housing and tenure types and area densities, which are expected to be:

A. ~~35%~~ affordable housing provision in accordance with strategic policy HN02;

B. a mix of types and sizes of market housing in accordance with strategic policy HN01; and

C. a site-wide average density of at least 45 dwellings per hectare.

High density housing of at least 55- 60 dwellings per hectare will be required within the town centre, neighbourhood centres and around key destinations and transport hubs.

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Gypsy and Traveller Provision

Up to 2042 – One or more sites accommodating at least 15 pitches.

Beyond 2042 – One or more additional site or sites accommodating at least 15 additional pitches.

Provision will be required in line with 'bricks and mortar' housing development and must be integrated with the new community's overall development proposals

Jobs

Up to 2042 – At least 17.5 hectares of land in office, industrial and warehouse sectors (E, B2 and B8).

Beyond 2042 – Around 30 hectares of land in office, industrial and warehouse sectors (E, B2 and B8).

Employment provision shall be made throughout the town to provide a range of spaces suitable for the needs of businesses as they develop and grow and to accommodate a range of employment opportunities for residents of the new community and surrounding areas.

Serviced or otherwise available land should be available for occupation by employment uses on a phased basis that is directly proportionate to house building occupations.

Town Centre

Up to 2042 – Allocation of 15 hectares of land for a town centre with completion of at least 5 hectares of land with completed and operational town centre uses, specifically to include retail, business and leisure uses.

Beyond 2042 – Completion of additional town centre development to occupy a grand total of at least 15 hectares of land (pre and post 2042 development).

A town centre will provide a focal point for retail, business and leisure activities and will be designed to create a vibrant day and night-time economy and this will be complemented by a series of smaller neighbourhood centres that will be built out alongside the homes that they serve.

Social, Community and Education Facilities

Accommodate a full range of social, cultural, sport, leisure, health, community and education facilities ~~(including new primary schools and a secondary school and a special educational needs school)~~ (including new primary schools and an education campus which will provide primary and secondary school places as well as provision for early

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years, pupils with special educational needs and Post 16) to meet the needs of all age groups that will live at the new community. Timely delivery of education infrastructure is essential. The education infrastructure planned for the new community will provide for a wider area in order to meet the needs of the plan. To specifically include 23 hectares of land for education provision.

Commented [A31]: More comprehensive wording agreed following discussion with Devon County Council.

Infrastructure

Infrastructure provision will need to come forward with overall development proposals. This will include at least 254 hectares of land for green [and blue] infrastructure provision (including approximately 150Ha of Suitable Alternative Natural Greenspace (SANG) to meet Habitat Regulations requirements. The Council will produce an Infrastructure Delivery Plan that will set out key requirements recognising the need for improved transport links, public rights of way network, cycle networks, bus services and road improvements, ~~district heating connections~~ community energy/heating provision, on-site renewable energy generation, drainage and SUDS requirements, new education provision, high speed broadband and other services and facilities to ensure sustainable development is delivered.

Commented [A32]: Wording change provide flexibilities over systems to use/apply.

Developments shall be developed in a phased and co-ordinated manner alongside the required infrastructure and in accordance with parameter plans for the new community which will be developed in partnership with developers and the community.

Proposals to develop land within the new community must progress in accordance with an allocation-wide masterplan, Infrastructure Delivery Strategy (to accord with the Infrastructure Delivery Plan produced by the Council), Phasing Strategy and Financial Appraisal which will have been submitted to and approved by the local planning authority prior to commencement of any development. Each planning application to be determined within the allocation area should accord with such approved documents unless otherwise agreed by the local planning authority. The allocation-wide Infrastructure Delivery Strategy will demonstrate that the development of the whole of the allocation area will deliver, in a timely manner, sufficient infrastructure to cater for the needs of the new community as a whole and also mitigate to an acceptable level the effects of the whole development upon the surrounding area and community.

Each planning application shall incorporate details of phasing and trigger levels for the provision of required infrastructure consistent with this policy and the Infrastructure Delivery Strategy. This must include proposals for the number and phasing of dwellings

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to be permitted, and the timing of housing delivery to be linked to the planned delivery of infrastructure. This will be regulated through the planning application process. Ad hoc or piecemeal development which is contrary to the aims of this policy or development that is inconsistent with the required masterplan for this site will not be permitted. Any development proposal which comes forward must demonstrate that the development does not compromise the ability to deliver the infrastructure required by this allocation and identified in this policy and the Infrastructure Delivery Strategy and does not prejudice the future integration of future development at the new community beyond this plan period.

In appropriate cases the Council, another government or public sector body or relevant landowners/developers may forward-fund and bring forward delivery of a specific item or items of infrastructure that is required for this allocation in the Infrastructure Delivery Plan and compulsory purchase powers may be used in order to deliver such items of infrastructure if required. Development proposals within the new community allocation (or benefitting from the infrastructure provided as part of the new community allocation) will be expected to contribute towards the infrastructure required by this allocation on a pooled and, where applicable, on a retrospective basis (i.e. a contribution will still be required, even where the infrastructure has already been built and/or fully or partially funded, including through forward-funding to ensure a fair and consistent apportionment of infrastructure costs across the new community). Such contributions may be sought on a framework section 106 basis to ensure that they are fairly and consistently apportioned between the development sites for the new community and may be applied by the Council to reimburse or offset such funding or provision by the Council, other government or public sector body or any relevant landowner/developer. As the final costs of the relevant infrastructure may not be known at the time, planning obligations requiring a contribution towards that infrastructure may also, where appropriate, contain a mechanism for review once the infrastructure has been fully paid for and constructed so as to secure payment of the appropriate final level of contributions to cover the costs of the infrastructure.

Stewardship

Establish a robust and sustainable new town-wide stewardship vehicle and governance early on in the planning and delivery process.

A Stewardship ~~Statement~~ Strategy will be a key component and will form part of the allocation-wide Masterplan providing full details of a) the governance structure and methods of funding of the proposed stewardship vehicle, b) public spaces and

Commented [A33]: This section was agreed to be added at committee on 11 Dec 2024.

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community assets to be owned, managed and maintained by the proposed stewardship vehicle and c) an indicative programme for the establishment and operation of the proposed stewardship vehicle.

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Meanwhile uses

Whilst waiting for land parcels to come forward for development, and in empty spaces created, appropriate 'meanwhile uses' will be actively encouraged. These 'meanwhile' uses are not expected to be permanent but they will allow social, cultural, business or environmental activity and enterprise to occur on spaces that could otherwise lie vacant or underused.

Waste transfer station

The development is to include a new waste transfer station that is to be completed and capable of operation.

Waste Water Treatment Works

The development is to include a new waste water treatment works to ensure sufficient capacity is available to support the development programme. The foul drainage strategy will include making the foul drainage system (sewerage) non rainfall responsive.

Commented [A34]: Text added to advise of need for a waste water treatment plant.

This policy does not apply in the Cranbrook Plan area.

Justification for policy

~~4.5.~~4.7. The local plan provides for a second new community near Exeter. The scale of development will ensure a wide range of services and facilities, supported by substantial infrastructure provision. Key facilities, including a secondary school, will be planned and built to serve the new community and surrounding areas.

~~4.6.~~4.8. The new community will take time to develop, with new homes expected around 2030. With build-out rates of 300+ homes per year we would anticipate around 3,300 homes to be constructed by 2042 and so significant development will extend beyond the local plan's 2042 end date, continuing into the mid-21st century. Public spaces and community assets at the new community need to remain in public ownership and the stewardship vehicle for these assets will need to be self-funding.

Commented [A35]: Text agreed for adding from committee meeting on 11 Dec 2024.

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The Enterprise Zone

~~4.7.~~4.9. Enterprise zones are designated areas where employment and business growth are actively encouraged, offering a simpler planning regime and incentives to investors. Enterprise zones in the West End of East Devon, including the Science Park, Skypark, and Exeter Logistics Park, have driven significant growth in high-value jobs. Supported by the Enterprise Zone designation, this area, alongside Exeter Airport, focuses on employment concentration, clean growth, and economic benefits for the wider district.

~~4.8.~~4.10. Clean growth, defined by the government as increasing national income while reducing greenhouse gas emissions[19], is central to the UK's industrial strategy. East Devon aims to achieve this through low and zero carbon development, district heating networks, and leveraging expertise at Exeter Science Park.

~~4.9.~~4.11. The Exeter and East Devon Enterprise Zone covers four areas, including a designated area within Cranbrook. The Council will continue to support employment-generating development within these sites, ensuring policy coverage is maintained.

~~4.10.~~4.12. One of the designated areas falls within Cranbrook. Cranbrook benefits from its own adopted plan which provides detailed policy coverage of the new community including the town centre which is also covered by a masterplan. Some policies in the Cranbrook Plan also apply to some parts or all of the area shown by the Cranbrook Plan.

Strategic Policy WS02: Development within the Enterprise Zone

Within the designated Enterprise Zone as shown on the Policies Plan support will be given for inward investment and development for business and allied uses.

All new development will need to be complementary to the existing use and purposes of the Enterprise Zone area and its specific vision for development.

[19] ECN-011 – The Clean Growth Strategy, https://eastdevon.gov.uk/media/2qncdlpf/ecn-011-clean-growth-strategy-correction-april-2018.pdf

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New buildings will need to connect to ~~the~~ district heating network ~~on~~ at ~~Science Park and~~ Sky Park and Monkerton in Exeter.

In the designated Enterprise Zone a range of building types and sizes, to maintain a flexible and competitive offer will be allowed for. However, ~~other than at Exeter Logistics Park,~~ large-scale warehousing and distribution development within the Enterprise Zone will only be allowed:

A. As a limited part of a mixed-use scheme; and

B. Providing it will not compromise the ability of those sites to deliver significant high value employment

This policy, is applicable to Cranbrook Town Centre, which is in the Enterprise Zone, and does apply in the Cranbrook Plan area.

Commented [A36]: Text amended to correct errors in reference to where district heating networks are located.

Commented [A37]: Text amended as Logistic Park is not in the Enterprise Zone.

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Justification for policy

~~4.11.~~4.13. The Enterprise Zone designation has been successful, and the aim is to build on this success. The focus will continue on developing Local Development Orders (LDOs) to support economic growth. An LDO grants planning permission for specific development proposals or classes of development in defined locations, streamlining the planning process and encouraging investment. LDOs provide clarity and certainty for development, sitting alongside local plan policy to detail appropriate development for the sites. They enable fast-track development to support businesses and job creation.

~~4.12.~~4.14. Current LDOs include:

- District Heating
- Power Park, Exeter

~~4.13.~~4.15. The Council is developing an LDO for Sky Park.

Exeter Science Park

~~4.14.~~4.16. Exeter Science Park, located northeast of Junction 29 of the M5 motorway, is connected with Exeter University, leveraging its academic excellence. The park supports and encourages companies in science, technology, engineering, mathematics, and medical fields to thrive. Since the early 2010s, Exeter

Science Park has grown rapidly, attracting high-quality businesses and significant new investment.

Strategic Policy WS03: Exeter Science Park

At the Exeter Science Park, as shown on the Policies Map, the following uses will be acceptable:

A. Research and development of products or services;

B. Active collaborations with universities, higher education, institutes, research or similar organisations;

C. Technology based services.

Uses which support the above primary activities and supporting green and grey infrastructure will also be accommodated.

New business developments will need to be of the highest quality built in a campus style setting, to reflect the existing Science Park development, with a particular emphasis on provision of high environmental quality and standards.

Other than for supporting infrastructure planning permission will not be granted for built development that comprises of non-business or for businesses that do not accord or align with Science Park objectives.

This policy does not apply in the Cranbrook Plan area.

Justification for plan policy

~~4.15.~~4.17. To meet future needs, the current development approach for the Science Park will continue. The existing 'gateway policy' (a legal agreement related to the original planning permission) will be maintained to ensure developments contribute to transformational economic impacts. This gateway policy addresses the types of business uses allowed at the Science Park and their operations.

Development of land north of Exeter Science Park

~~4.16.~~4.18. Land north of Exeter Science Park offers potential for high-quality mixed-use development, including housing and small business units.

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Strategic Policy WS04: Land north of the Science Park (Brcl_23)

An area of around 4.3 hectares north of the Science Park, as shown on the Policies Map, is allocated for:

A. A mix of housing (90 dwellings on 2.3ha);

B. Small business units (2ha) in E(g)(iii) use; and

C. Supporting green and grey infrastructure.

A comprehensive scheme for n~~N~~ew development will need to be of the highest quality with a particular emphasis on provision of high environmental quality and standards.

This policy does not apply in the Cranbrook Plan area

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Justification for plan policy

4.19. To continue employment growth in the West End of East Devon, additional land is allocated for job-generating uses. This site, north of the existing Science Park and east of the M5 Motorway, may experience noise impacts, affecting suitability for some non-employment uses. Therefore, 2ha to the west of the site is allocated for small, high-quality business units to meet local demand, with the remaining 2.3ha allocated for housing.

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~~4.17.~~

Exeter Airport and development in the environs

~~4.18.~~4.20. Exeter Airport is strategically important for travel and communications ~~in the south-west of England~~, serving as a key asset for East Devon and surrounding areas. Plan policy supports the airport's future operation and growth, promoting it as a gateway to the region and a hub for high-skilled, high-value job creation in aviation and other sectors.

Strategic Policy WS05: Exeter Airport and its future operation and development

Growth and expansion of the airport and airport related businesses and operations will be supported within its current operational boundaries. The role of the Airport as

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a test bed for new technologies will be supported through promoting the development of a sustainable aviation cluster.

Within airport operational boundaries~~, as shown on the Policies Map~~:

A. Land to the north of the runway will be allowed to support aviation related development including research and development activity alongside maintenance/repair/overhaul and new freight/cargo operations;

B. Land to the south will be allowed to accommodate further aviation related, employment and training/education uses. This can include occupiers who rely on proximity to an Airport or who benefit from a transferrable skill base as well as to support the developing logistics cluster.

Any new developments must not, however, prejudice or adversely impact on the core operational role and functions of the airport as a travel facility handling the air bound movements of passengers and freight.

Beyond airport operational boundaries noise sensitive development within the 57db noise contour around the airport will be restricted (in order to ensure future airport operations are not adversely impacted) alongside ensuring that any development proposals do not have a material impact on the operation of navigational and safety systems.

The transition to net zero carbon operations at the airport will be supported through enhanced public transport surface access and the installation of renewable energy generating capacity.

This policy does not apply in the Cranbrook Plan area.

Commented [A38]: We do not have definitive operational boundaries and as such cannot show them.

Justification for plan policy

~~4.19.~~4.21. Exeter Airport is a key gateway to the region, supporting market access, tourism, and serving as a base for the Devon Air Ambulance, National Police Air Service helicopters, and the Royal Mail flight. Exeter Aerospace provides maintenance, repair, and overhaul operations, while the Future Skills Centre offers training for high-tech jobs.

~~4.20.~~4.22. The Local Plan aims to safeguard current operations and support future growth, particularly towards sustainability. Exeter Airport has the potential to be a testbed for new aviation technologies and propulsion modes,

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contributing to a sustainable aviation cluster. This aligns with the global challenge to decarbonisze aviation, supported by initiatives like the Future Flight programme.

~~4.21.~~4.23. Opportunities exist for further development north and south of the runway. The north can support research and development and new cargo markets, while the south can accommodate commercial development and expand education and training facilities.

~~4.22.~~4.24. It is essential that new development does not compromise the airport's safe operation, considering noise sensitivity and the safeguarding of navigational and safety systems.

Employment land east of the airport buildings

~~4.23.~~4.25. Power Park, a 7.7ha site, benefits from a Local Development Order allowing up to 26,000 sqm of employment space. Land is allocated for various employment uses south and east of Power Park and the airport terminal buildings, as shown on the Policies Map. This site is ideal for high-technology airport-related uses and clean green technology, which should be integral to the masterplan.

Strategic Policy WS06: Employment land east of airport

An area of 24.34 hectares of land east of existing airport buildings and lying either side of Long Lane, is allocated for employment uses (GH/ED/43 and GH/ED/45 and Rock_09a).

The site will form a mixed-use business park and the following uses will be considered appropriate:

A. B2 (general industrial);

B. B8 (storage and distribution);

C. E(g) (Uses which can be carried out in a residential area without detriment to its amenity:

1. Offices to carry out any operational or administrative functions,

~~1.~~2. Research and development of products or processes;

~~2.~~3. Industrial processes;

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~~C.~~D. A limited element of ancillary uses such as indoor sports, recreational or café will be permitted but only where strictly supporting and subordinate to the development of the above employment uses;

~~D.~~E. With its proximity to Exeter Airport the site is well positioned to assist the role of the airport. Uses which relate to the aviation sector and its wider supply chain will be particularly supported alongside other high value employment uses that facilitate economic growth within the area.

This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. The masterplan must~~,~~ ~~including~~ include measures to provide fully for ~~its~~ infrastructure requirements and appropriate mechanisms for apportionment of development costs and contributions across separately owned land parcels. Planning permission will not be granted for any individual parcel of land in the allocation in the absence of this Masterplan.

The masterplan will need to demonstrate that the following will also be achieved/undertaken:

Traffic mitigation to avoid additional traffic negatively impacting on the operation of the local highway network in particular the Long Lane B3184 Intersection;

A.

B. Safe cycle and pedestrian access to nearby facilities~~;~~ and enhancement of public transport accessibility;

C. Protection of the County Wildlife Site;

D. Archaeological assessment to ensure that any impact on the historic WWII airfield is minimised and mitigated;

E. Heritage impact assessment and mitigation taking account of nearby heritage assets (including Grade I listed Rockbeare Manor and its associated Grade II Registered Historic Park and Garden) with careful consideration of setting, building height, design, and landscaping;

F. A comprehensive site-specific Flood Risk Assessment is to be undertaken to assess the risk of surface water and groundwater flooding in relation to the proposed development, and the access and egress arrangements and development should be placed outside of the areas at risk from surface water flooding;

G. Infiltration rates are to be assessed on site as part of a drainage strategy and there is to be early engagement with the Lead Local Flood Authority~~LLFA~~ and the

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Environment Agency~~EA~~ on the proposed ~~SuDS~~ sustainable drainage system measures and infiltration rate.

~~G.~~ -This policy does not apply in the Cranbrook Plan area.

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Justification for plan policy

~~4.24.~~4.26. The proposed allocation provides strategic-scale employment opportunities next to Power Park and the airport buildings. Uses supporting airport-related and aeronautical business activities will be central to the required masterplan, promoting high-skilled, high-quality green job growth. The site's proximity to the airport and other development sites enhances its attractiveness for businesses and educational establishments.

~~4.25.~~4.27. Sustainability improvements, including Long Lane enhancements and the Silverdown Link bus loop/cycleway, are enabling increased employment density and improved public transport viability.

~~4.26.~~4.28. The site is within a Nitrate Vulnerable Zone and Impact Risk Zones for the Exe Estuary SPA and East Devon Pebblebed Heaths SPA and SAC, requiring careful management of water discharge and air pollution impacts.

Employment land north of the airport, adjoining Treasbeare

~~4.27.~~4.29. Land is allocated for employment uses to the north of the Airport, as shown on the Policies Map. The site is particularly suited to light and general industrial development.

Strategic Policy WS07: Employment land north of the airport, adjoining Treasbeare

An area of 15.3 hectares of land, as shown on the Policies Map to the north of the airport, is allocated for employment uses (Clho_09). The following uses will be considered appropriate;

A. The majority (or all) to be B2 (General industrial);

B. With the remainder (if any) B8 and E(g).

The development will need to come forward in accordance with an approved phasing plan and promote active travel measures and other than for supporting infrastructure

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planning permission will not be granted for built development that comprises of non-business uses.

Development proposals for the site must be accompanied by measures to provide fully for its infrastructure requirements and a new access onto London Road capable of safely accommodating the level of traffic likely to be generated when the site is at capacity.

This allocation will need to be supported by further flood risk assessment and measures to ensure that safe cycle and pedestrian access to nearby facilities can be achieved.

Archaeological assessment will be required prior to development commencing to ensure that any impact on the historic WWII airfield is minimised and mitigated.

This policy does not apply in the Cranbrook Plan area.

Justification for plan policy

~~4.28.~~4.30. Land north of Exeter Airport, south of the old A30, is allocated primarily for general industrial use due to its location near the airport runway and associated noise impacts. Storage and distribution ~~are~~ will be permitted as subordinate elements of the scheme ~~if~~ provided new access arrangements and the local highway network can safely accommodate the traffic. Development proposals must be based on further environmental, heritage, and traffic assessments, with appropriate mitigation if required.

~~4.29.~~4.31. The site is within an Impact Risk Zone for the Exe Estuary SPA, which may be triggered by water or liquid waste discharge of more than 20m^3/day. The Impact Risk Zone for the East Devon Pebblebed Heaths SPA and SAC may be triggered by industrial development causing air pollution.

Employment land at Wares Farm, opposite the airport buildings, south of the A30

~~4.30.~~4.32. A small piece of land is allocated for employment uses on the southern side of the A30, opposite the airport buildings. The site is shown on the Policies Map and is suitable for small business or start-up units.

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Strategic Policy WS08: Employment land opposite airport buildings, south of A30

An area of 1 hectare of land, as shown on the Policies Map, is allocated for small business units (Farr_01). The following uses will be considered appropriate;

A. B2;

B. E(g).

Archaeological assessment will be required prior to development.

Site-specific Flood Risk Assessment is required and development should be placed outside of the areas at risk from flooding.

This site will require private sewage/drainage measures and infiltration rates must be assessed on site as part of a drainage strategy.

This policy does not apply in the Cranbrook Plan area.

Justification for plan policy

~~4.31.~~4.33. Land south of the A30 is allocated for small business or start-up units to offer flexibility and meet the need for smaller, less expensive premises not otherwise available in this area. Occupiers may provide supporting services to nearby residents and businesses at the airport.

~~4.32.~~4.34. The site is within a Nitrate Vulnerable Zone and Impact Risk Zone for the Exe Estuary SPA, which may be triggered by water or liquid waste discharge of more than 20m^3/day to ground or surface water. Additionally, the Impact Risk Zone for the East Devon Pebblebed Heaths SPA and SAC may be triggered by industrial development causing air pollution.

The ongoing development and potential for expansion of Cranbrook

~~4.33.~~4.35. Cranbrook is a new community under construction on the western side of East Devon, about 5 km from the M5 Motorway and Exeter City boundary. Since starting from a green field in 2011, it has grown to around 3,000 homes by the end of 2021. The Cranbrook Plan includes policies to expand the town to nearly 8,000 homes.

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~~4.34.~~4.36. Cranbrook will continue to develop under the adopted Cranbrook Plan, with selected policies from this local plan also applicable. The Cranbrook Plan has an end date of 2031, and a new plan will supersede it before then. All infrastructure requirements to support ongoing development in Cranbrook are set out in the Cranbrook Plan.

Commented [A39]: Text moved to an earlier point in this chapter where it sits better.

Commented [A40]: Text added to stress infrastructure planning importance of the Cranbrook Plan.

Clyst Valley Regional Park, Green infrastructure and a high-quality environment for the West End

~~4.35.~~4.37. Green Infrastructure (GI) is a network of multifunctional green spaces and natural areas, including footpaths, cycleways, and other routes that link these spaces. GI delivers a wide range of environmental, economic, health, and wellbeing benefits. Significant emphasis has been placed on GI provision and enhancement in the western side of East Devon, particularly through the Clyst Valley Regional Park, which this plan provides the expansion for.

Strategic Policy WS09: Clyst Valley Regional Park

Land is allocated, as shown on the Policies Map, for the Clyst Valley Regional Park (CVRP). Development proposals within and adjacent to the CVRP will integrate Green Infrastructure and support the achievement of the objectives in the CVRP Management Plan. Any schemes that do not contribute to these objectives, or which would frustrate their implementation, will be refused planning permission.

All major development proposals within or on land adjacent to the Clyst Valley Regional Park will need, directly or through mitigation, to:

A. Meet local plan policy requirements for Green and Blue Infrastructure;

B. Provide connected cycling/walking infrastructure, where possible, including extension of or links to the Clyst Valley Trail;

C. Restore and enhance the landscape character and sense of place of the Clyst Valley;

D. Reduce recreation pressure on environmentally sensitive locations, through the creation of accessible green space and where appropriate Suitable Alternative Natural Greenspace (SANG);

E. Contribute to the achievement of excellent ecological status in the River Clyst and tributaries, through enhanced natural flood storage, capture of run-off and restoration of soil health;

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F. Contribute to or make proportionate contributions to the following CVRP targets:

1. Creation and/or restoration of 1,000 hectares of priority natural habitat within the Nature Recovery Network;
2. 30% tree canopy cover in accordance with the East Devon Tree, Woodland and Hedges Strategy;
3. 740 hectares of Public Open Space meeting 'Building with Nature' or 'Green Flag Award' standards;
4. 80 km of traffic-free trail and quiet way meeting LTN 1/20 design standards – see Cycle infrastructure design (LTN 1/20) - GOV.UK (www.gov.uk).

Where major development occurs outside of but close to the allocated park, we would wish to see all the above policy tests addressed ~~any~~ and also green space provision associated with or required for the development should, where possible, be linked to and provide pedestrian and cycle access into the CVRP.

This policy applies in all of the Cranbrook Plan area.

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Justification for policy

~~4.36.~~4.38. The Clyst Valley Regional Park is a strategic asset on the western side of East Devon, forming a setting for new developments. It was first defined alongside earlier strategic development schemes.

~~4.37.~~4.39. A 25-year masterplan for the Regional Park[20], approved by EDDC in February 2021, won the 2021 RTPI South West Award for Planning Excellence and was a finalist in the national RTPI awards 2022.

~~4.38.~~4.40. The park concept links greenspaces with predominantly traffic-free trails and good public transport. Most of the park is privately owned, with 762 hectares currently accessible and an ambition to increase this by 740 hectares over 25 years. A large portion of the park is within the National Trust's Killerton estate and 40% is within a floodplain.

[20] ENV-001 – Clyst Valley Regional Park 25 Year Masterplan, https://eastdevon.gov.uk/media/2pwh3s1e/env-002-cvrp-masterplan-final.pdf

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~~4.39.~~4.41. The park ~~ensures~~ helps contribute to European protected wildlife sites meeting conservation objectives. ~~SANGS can mitigate public disturbance impacts on Natura 2000 sites and may be within or outside the park boundary if they meet SANGS criteria.~~

~~4.40.~~4.42. The Clyst Canopy project aims to increase tree cover from 10% to 30% over 50 years through retaining mature trees, natural regeneration, and planting various tree forms. Urban tree cover is also vital.

~~4.41.~~4.43. Delivering park objectives relies on partnerships across public, private, and charitable sectors, with funding from diverse sources, including Community Infrastructure Levy and Section 106 obligations. EDDC has secured funding from the National Lottery Heritage Fund with match funding from partners.

Development north of Topsham and east of the M5 Motorway

~~4.42.~~4.44. Talking advantage of proximity to Exeter and links with Topsham, land is allocated for an urban extension north of Topsham.

Strategic Policy WS10: Development next to the M5 and north of Topsham

Land shown on the Policies Map is allocated in East Devon for an urban extension to the north of Topsham to accommodate mixed use development including:

A. Around 596 new homes;

B. 2.4 hectares of employment land;

C. ~~1.8 hectares of land for, and the delivery of, a new 220 place primary school~~ 1.8 hectares of land safeguarded for education purposes to provide the option for primary education infrastructure on site. Additional early years, primary, and secondary education infrastructure is required to support this development. Additional provision for pupils with special education needs and provision for home to school transport is also required.; and

D. Supporting infrastructure, green spaces and links to the Clyst Valley Regional Park.

The development will need to be supported by a new developer provided SANGs, brought forward and implemented as part of the overall scheme on the allocated or on nearby land.

Commented [A41]: Text added following discussion with Devon County Council. Also note minor change (deletion) further in in policy. Would waters down requirement for school dependent on further work on needs assessment and options.

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This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented, including with appropriate mechanisms for apportionment of development costs and contributions across separately owned land parcels. Full agreement will be required before any specific parcels of land can come forward for development.

This Masterplan will also need to be developed in conjunction with joint work between Exeter City Council and East Devon District Council on a formal **Development and Infrastructure Delivery Framework** which is required to ensure development and infrastructure needs on the edge of Topsham, in the Exeter City Council area, and the adjacent allocation North of Topsham, in East Devon, progress in a coordinated cross-boundary manner.

The delivery framework will include:

A. The timely delivery and funding of a range of infrastructure and facilities including ~~primary education,~~ primary healthcare, indoor space for community use, sport and recreation and green infrastructure to meet the needs from development in Exeter and East Devon;

B. A comprehensive transport strategy to prioritise active travel and public transport; and

C. The need to respect Exeter's landscape setting area and the Clyst Valley Regional Park.

The Delivery Framework will be produced jointly by East Devon District Council and the City Council working with partners including landowners, developers, Devon County Council, the Environment Agency, Natural England, the NHS, community groups and Clyst St George Parish Council.

Through a transport assessment the traffic impacts of development of the site will need to be assessed in conjunction with the cumulative impacts that will also arise from development of the new community, and other new developments. Mitigation measures will need to be designed and agreed, to come forward in parallel with or prior to development to address adverse impacts, specifically including in respect of the ~~on~~ M5 J30 (Sandygate Roundabout) and Clyst St Mary Roundabout.

Commented [A42]: Text added in response to concerns raised by Devon County Council.

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Planning permission will not be granted for any individual parcel of land in the allocation in the absence of a comprehensive development scheme with clear mechanisms outlined for full policy requirements to be met and delivered.

This policy does not apply in the Cranbrook Plan area.

~~4.43.~~4.45. Land near Exeter, south of Junction 30 and to the east of the M5, offers an opportunity for new mixed-use development, accommodating around 5~~80~~96 new homes. Development in East Devon should be planned in the context of East Devon standards as well as city development, with a masterplan addressing development in East Devon and joint work on an Infrastructure Delivery Plan across the city boundary.

Gypsy and traveller site east of the M5

~~4.44.~~4.46. Land east of the M5 and south of the Exeter-Waterloo line has been identified for a gypsy and traveller site due to an unmet need, particularly in the West End of East Devon.

Strategic Policy WS11: Gypsy and traveller site east of M5

Land shown on the Policies Map that lies to the east of the M5 and south of the Exeter-Waterloo line is allocated for a gypsy and traveller site to provide at least 5 permanent pitches.

Planning permission will be granted for development of a gypsy and/or traveller site to address need for provision specifically on the western side of East Devon District. The allocated site benefits from good highway access roads to the south though any proposal will need to be carefully designed to avoid adverse impacts on surrounding uses and the high quality of commercial and residential development in this part of East Devon. A pedestrian link, free for all to use, should be provided as part of any scheme at this site between the existing country park to its east and its Langaton Lane to its west.

Commented [A43]: Requirement for a footpath link added to policy.

An area of floodplain covers part of the site and as such built development will need to be within central and northerly parts of the site and further flood risk assessment will be required to demonstrate acceptability of proposals. Development for non gypsy and traveller uses and occupation, other than for supporting infrastructure, facilities and landscaping will ~~be resisted~~ not be allowed.

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This policy does not apply in the Cranbrook Plan area.

Justification for plan policy

~~4.45.~~4.47. The latest needs study highlights[21] a shortage of gypsy and traveller accommodation in East Devon, with a particular need in the West End due to historic travelling patterns. The site offers good highway access and pedestrian access to services and facilities. It previously housed a piggery, and existing farm buildings may be converted for ancillary use.

Employment land at Sandygate, between the M5 and Clyst Road

~~4.46.~~4.48. A small piece of land on the eastern side of Clyst Road is allocated for employment uses, suitable for small business or start-up units.

Strategic Policy WS12: Employment land at Sandygate, between M5 and Clyst Road

An area of 0.7 hectares of land, as shown on the Policies Map, is allocated for small business units (Clge_07) for light or general industrial use only, recognising that there is a local need for such provision. The following uses will be considered appropriate;

A. B2;

B. E(g).

This allocation will need to be accessed through the adjoining employment site unless it can be demonstrated that a safe access directly onto Clyst Road can be achieved. Development may also need to contribute towards localised mitigation of any traffic concerns on the highway network.

Archaeological assessment will be required prior to development commencing and building height and design considerations will be critical in order to ensure that development does not impact on the setting of Clyst St Mary Bridge, which is a Scheduled Monument.

[21] HOU-009 – East Devon Gypsy and Traveller Accommodation Assessment, https://eastdevon.gov.uk/media/gl0n5qkq/2024-09-30-east-devon-gtaa.pdf

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This policy does not apply in the Cranbrook Plan area.

Justification for plan policy

~~4.47.~~4.49. This site is allocated for small business or start-up units to meet the need for smaller, less expensive light or general industrial premises not otherwise available in this area. Development proposals must consider environmental, heritage, and traffic assessments, with appropriate mitigation if required. Contributions may be sought for active travel plan improvements as outlined in the emerging Clyst Road Access Strategy. The Impact Risk Zone for the Exe Estuary SPA may be triggered by air pollution or water discharge exceeding 20m^3/day.

Employment land at Lodge Trading Estate, Station Road, Broadclyst

~~4.48.~~4.50. Land to the east of the existing employment area at Lodge Trading Estate, Broadclyst, is allocated for small or medium businesses, but not for those generating significant HGV movements due to local highway constraints.

Strategic Policy WS13: Employment land at Lodge Trading Estate, Broadclyst

An area of 1.89 hectares of land, as shown on the Policies Map, is allocated for employment use (Brcl_27a). The following uses will be considered appropriate;

A. B2;

B. E(g).

Due to the special characteristics of the site, further assessment work will be required to inform any planning application. This should include:

A. Detailed flood risk assessment;

B. Archaeological assessment; and

C. Onsite verification of the extent of the Coastal and Floodplain grazing marsh priority habitat and a design and layout which avoids this area.

The access arrangements will require assessment to ensure that Station Road is suitable to accommodate additional traffic and any non-motorised user requirements.

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The developer may be required to contribute towards localised mitigation on the highway network.

This policy does not apply in the Cranbrook Plan area.

Justification for plan policy

~~4.49.~~4.51. This site extends an existing business park, limited to areas outside the floodplain and not in active employment use. Development must consider environmental and heritage factors, and future highway improvements for non-motorised users. Proximity to the railway requires improvements to fencing and maintenance access. The Impact Risk Zone for the Exe Estuary SPA may be triggered by water discharge exceeding 20m^3/day.

Employment land south of Langdon's Business Park, Clyst St Mary

~~4.50.~~4.52. Land to the south of Langdon's Business Park, Clyst St Mary, is allocated for employment uses, suitable for small or medium businesses, with a focus on supporting the expansion of existing businesses.

Strategic Policy WS14: Employment land south of Langdon's Business Park, Clyst St Mary

An area of 1 hectare of land, as shown on the Policies Map, is allocated for new business units (Sowt_15a). The following uses will be considered appropriate;

A. B2;

B. B8;

C. E(g).

Archaeological assessment will be required prior to development commencing. Due to the proximity of a number of Grade II listed buildings a high quality sensitively planned development scheme will be required at this site with particular attention given to of building heights, design, materials and landscaping along with associated mitigation measures.

The current access arrangements will require reassessment to ensure they are suitable to accommodate additional traffic. The developer may be required to contribute towards localised mitigation on the highway network.

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This policy does not apply in the Cranbrook Plan area.

Justification for plan policy

~~4.51.~~4.53. This site is allocated for business units, particularly to support the expansion of existing businesses on the Business Park. Development must consider environmental, heritage, and traffic factors, with detailed assessments and appropriate mitigation as required. The Impact Risk Zone for the Exe Estuary SPA may be triggered by industrial development causing air pollution or water discharge exceeding 5m^3/day

Employment land at Darts Farm, Topsham Road, Clyst St George

~~4.52.~~4.54. Darts Farm, a popular shopping centre, has ~~a small~~an adjacent parcel of land allocated for employment use. This site offers an opportunity to produce and showcase locally grown food and drink.

Strategic Policy WS15: Employment land at Darts Farm

An area of 2.13 hectares of land, as shown on the Policies Map, is allocated for small business units in Use Class E(g) for the manufacture or processing of locally grown food and drink products (Clge_23a and Clge_25a).

Road access for this allocation will most likely need to be through the main Darts Farm access, with the likelihood of highway improvements being needed, and development proposals will be required to demonstrate that this can be achieved safely and without detriment to the existing commercial activities and car parking provision on the wider site. The developer may also be required to contribute towards localised mitigation on the highway network.

Archaeological assessment will be required prior to development commencing.

A site-specific FRA will be required to assess the risk of surface water and groundwater flooding in relation to the proposed development, and development should be placed outside of the areas at risk from surface water flooding. Infiltration rates will need to assessed on site as part of a drainage strategy. Noting that the site is located within a Nitrate Vulnerable Zone, Impact Risk Zone for the Exe Estuary SPA may be triggered if there is any discharge of water or liquid waste that is discharged to ground or to surface water. If the development will affect trees or hedges along the

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north of the site, then further assessment of impact on the Exe Estuary SPA will be required.

This policy does not apply in the Cranbrook Plan area.

Justification for plan policy

~~4.53.~~4.55. This site is allocated for small business units to complement the adjoining retail use, add value to locally produced goods, and meet an identified need in the District. Preference is given to the manufacture and processing of local food and drink products.

~~4.54.~~4.56. Development proposals must be based on further environmental, heritage, and traffic assessments, with appropriate mitigation undertaken if required.

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Development in the Towns and Villages



Chapter 5. Development in the Towns and Villages

5.1. This chapter outlines land allocations for development in Exmouth, Main Centres, Local Centres, and Service Villages in East Devon, based on the settlement hierarchy set out in the plan. It should be noted that none of the policies in this chapter apply in the Cranbrook Plan area and specific refence is not made, in this chapter, to non-applicability.

5.2. Policies specify expected development levels on each site, expressed as approximate numbers/area figures. Higher or lower levels may be possible depending on site-specific constraints or opportunities. Policies address challenges, concerns, or opportunities for high-quality development on specific allocation sites but the plan should be read as a whole to apply all relevant policies.

The principal centre of Exmouth

5.3. Exmouth is established as the only Tier 1 settlement, and is suitable for higher levels of growth and development. The plan allocates land for housing and employment in Exmouth, proportionate to its size, function, and future role, as shown on the policies map.

Strategic Policy SD01: Exmouth and its development allocations

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

Land to the South of Courtlands Lane (Exmo_23)

This land, south of Courtlands Lane, will form a small-scale development on the northern side of Exmouth to accommodate around 12 new homes. The scheme will need to demonstrate how safe pedestrian access, avoiding on-road walking, will be achieved to surrounding and neighbouring areas.

Land at Courtlands Cross (Lymp_07)

This site at Courtlands Cross will accommodate around 100 new homes and 0.4 hectares of employment land. The field to the west of the housing allocated land is allocated for delivery of sports pitch uses and associated low key ancillary facilities as

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part of a viable package of planning obligations. Built development at this site, located on the two south-easterly fields, will need to be particularly sensitively designed to avoid potential for adverse impact on nearby heritage assets and to avoid adverse landscape impacts. Particular importance is attached to retention of the East Devon Way footpath, in a spacious corridor, across the site in a north-south direction. There should also be safe off-street pedestrian and cycle access that provides for east-west movement through the area for existing and future users linking into adjacent areas such as Lympstone Manor and allocated site Exmo_23. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Land west of Hulham Road (Exmo_47)

This land west of Hulham Road, south of Point-in-view, is allocated for around 15 new homes. The sensitive historic setting of this site, with a Registered Park or Garden to the northern and western site boundaries is such that any scheme will need to be sensitively designed to avoid adverse impacts. Built development should be accommodated in the southerly parts of the site only.

Land at Coles Field Hulham Road (Lymp_14)

This site is allocated for around 59 new homes. Biodiversity interest at and close to this site will demand particular sensitivity in respect of site design and implementation to avoid damages. This site will need to provide pedestrian and cycle access into the adjoining site Exmo_04a.

Land at Marley Drive (Exmo_04a)

This site is allocated for around 50 new homes. The site supports a number of significant mature trees with areas of biodiversity value within the site and to its boundaries which will demand particular sensitivity in respect of site design and implementation to avoid damages. There will need to be pedestrian and cycle access through this site into Site Lymp_14 and thereafter on into Goodmores Farm.

Land at St John's (Exmo_20)

Land at St John's, on the eastern side of Exmouth, is allocated for a comprehensive development scheme to accommodate:

A. Social and community facilities;

B. Around 700 new homes; and

C. At least 2 hectares of employment land.

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This site allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how phased comprehensive development will be undertaken and implemented, including with appropriate mechanisms for apportionment of development costs and contributions across separately owned land parcels. Full agreement will be required before any specific parcels of land can come forward for development.

Built development will need to be concentrated in the southern parts of the site and the scheme will need to place considerable emphasis on protection of the setting and tranquillity of nearby heritage assets, specifically St John in the Wilderness church. Support will be given for expansion of the churchyard, to provide more burial/interment of ashes space at St John in the Wilderness. Parts of the site and adjoining areas, especially woodlands are of biodiversity importance and sensitivity and great care will be needed in developing proposals to ensure their protection and enhancement. New homes and other development that would result in unacceptable impacts will not be permitted within 400 meters of the Pebblebed Heaths. The development will need to be supported by a new developer provided SANGs, brought forward and implemented as part of the overall scheme on the allocated or on nearby land.

Vehicular access, to accommodate modest levels of development, will be allowed for ~~to~~ southern site parts ~~will be~~ from the road 'Southern Wood', subject to detailed assessment of highway access acceptability and objective review of local road and junction capacity and with mitigation provided to address unacceptable adverse impacts. ~~with northern parts~~ Primary vehicle access to the site, serving the large majority/large bulk of development, will be from the B3179 to the north. High quality, safe and attractive to use pedestrian, cycle and public transport access, particularly providing southerly site links into Exmouth and to nearby services, facilities and job opportunities, will need to be an essential part of the overall development scheme.

Commented [A44]: Amendment agreed by Committee on 11 dec 2024.

Commented [A45]: Changes made noting concerns raised over road access acceptability and capacity, including following conversations with Deven County Council.

Land directly to the East of Liverton Business Park (Exmo_18)

This land east of Liverton Business Park is allocated for employment uses and will form an extension to the existing business park and extends to around 2.7 hectares in size.

Land to the South of Littleham (Exmo_17)

This land on the north eastern side of Exmouth is allocated for a mixed-use development to provide:

A. Around 410 new homes;

B. 1.6 hectares of employment; and

C. supporting community uses.

This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. The site is located in the East Devon National Landscape and particular sensitivity will need to be taken in respect of design and development approaches to minimise potential for adverse landscape impacts. Southerly parts of the site are particularly sensitive and considerable care will be needed in protecting the setting and ambience of St Margaret and St Andrews Church at Littleham.

The development will need to be supported by a new developer provided SANGs, bought forward and implemented as part of the overall scheme on the allocated or on nearby land. The cycle path bisecting the site will need to be retained and enhanced within an attractive corridor with pedestrian and cycle access routes provided throughout the development.

Vehicular access will be from Salterton Road and will need to take a harmonised approach with the industrial estate to the north of the road, potentially with a shared intersection. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Commented [A46]: Text added following discussion with Devon County Council.

Littleham Fields (Exmo_08 and Exmo_16 combined)

This land close to Littleham will form a small-scale residential extension on the southern side of Exmouth to accommodate around 45 new homes. Parts of the site are steeply sloping and great care will be needed in design and through landscaping to minimise landscape impacts. There is also the listed Green Farm to the west of the site the setting of which will need to be carefully address. Vehicular access via Elm Lane would be less desirable, with Parlour Meadow more suitable.

Land at Douglas Gardens (Exmo_06)

This land at Douglas Gardens will form a small-scale residential extension on the southern side of Exmouth to accommodate around 44 new homes.

Exmouth town centre Police Station (Exmo_50)

This site forms an urban redevelopment opportunity that will accommodate a new police station as well as at least 20 new homes, though with skilful design, noting the significance heritage interests around the site, a greater number of new homes will be

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actively encouraged. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan.

Axminster

5.4. The Local Plan strategy establishes Axminster as a Tier 2, Main Centre, settlement and as such as an appropriate location for future growth and development.

Strategic Policy SD02: Axminster and its development allocations

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

Land east of Lyme Road (Axmi_22)

This site is allocated for 100 dwellings. The site layout should make provision for a suitable access road to facilitate the development of site GH/ED/80 to the north and also be built to a standard suitable for use as part of a possible future relief road to link to the A358, Chard Road, south of the Weycroft Bridge.

Prestaller Farm, Beavor Lane (Part of GH/ED/80)

This site is allocated for 225 dwellings and a community hub to the south of the Mill Brook. The community space should provide opportunities for a workspace, café/shop and meeting space. To the north of Mill Brook land has the potential for use as a multi-functional public open and natural space as well as for habitat mitigation purposes. Where this is required to meet the needs of the development provision will be required. Vehicular access to the site shall be from the allocated land to the south (Axmi_22) unless otherwise agreed.

Development must incorporate a site road that is of a standard and is appropriately located so that it, and through potential future extension of the road, can form a possible future relief road to link to the A358, Chard Road, south of the Weycroft Bridge. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan.

Sector Lane should be reconfigured and harmonised into future proposals. Public Rights of Way enhancements should also be explored. The development will need to

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maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Commented [A47]: Text added following discussion with Devon County Council.

Land west of Chard Road (GH/ED/83)

This land is allocated for 140 dwellings and 0.8 hectares of employment land. Development proposals should seek to introduce bus stops on Chard Road to promote sustainable travel into Axminster and to railway station. Development should also ensure pedestrian/cycle access onto Axminster Footpath 79.

Commented [A48]: Text added following discussion with Devon County Council.

Land west of Musbury Road (Axmi_01a)

This land is allocated for 2 hectares of employment land. The site contains two World War II pill boxes and development between them and the railway line to the west should be kept as public open space with interpretation boards to explain the significance of their role in the Taunton Stop Line. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan.

Land east of Musbury Road (Axmi_02, Axmi_08 and Axmi_09)

This land is proposed for 438 dwellings and 1.6 hectares of employment land. This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. Through this masterplan particular account will need to be taken of providing active travel links to the town centre and railway station, together with addressing the landscape and heritage sensitivities of the site. Highways access shall be taken from the A358 Musbury Road. The masterplan shall take full account of archaeological survey work to determine the extent of remains associated with the adjacent Scheduled Ancient Monument. Community facilities to include a hall or meeting place will need to be incorporated into and delivered by the development. Connectivity onto Wyke Road and public rights of way will be required to ensure good pedestrian/cycle access. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes. In particular, it should explore opportunities to provide off-carriageway bus stops on Musbury Road to improve sustainable travel options.

Commented [A49]: Text added following discussions with Devon County Council.

Land at Axminster Carpets (Axmi_07)

This land is allocated for mixed-use redevelopment to retain the existing employment use and accommodate 50 dwellings plus additional employment uses. This allocation will need to be supported by further flood risk assessment and a comprehensive

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masterplan to secure pedestrian, environmental and other improvements. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential and exception test has been undertaken as part of the local plan. Development should be appropriately designed to accommodate pedestrian/cycle access and through routes.

Commented [A50]: Text added following discussions with Devon County Council.

Scott Rowe Building, Axminster Hospital, Chard Road (Axmi_10)

This brownfield land redevelopment opportunity land is allocated for 10 dwellings.

Land at Lea Combe, Field End (Axmi_12)

This land is allocated for 9 dwellings. The site will need to be carefully designed to accommodate and protect the trees, which are subject to a Tree Preservation Order, and also to protect the setting of nearby heritage assets.

Land east of Lyme Close (Part of Axmi_11c)

This land is allocated for 50 dwellings and 0.4 hectares of employment land.

The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Commented [A51]: Text added following discussions with Devon County Council.

Land at Millwey, Chard Road, Axminster (Axmi_17 ~~Land at Millwey~~)

This land is allocated for 19 dwellings. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan. This site is an existing open space, with a previous use for sports pitches, the loss of which will need to be addressed through the development process. Careful consideration of access arrangements may require the relocation of the southbound bus stop.

Commented [A52]: Text added following discussions with Devon County Council.

Millwey Garages, St Andrews Drive (Axmi_18)

This Brownfield land is allocated for 6 dwellings.

Websters Garage, 9 Lyme Street (Axmi_23)

This land is allocated for 10 dwellings as part of a mixed-use development. Though with well-designed development there is potential scope to accommodate more new homes potentially as well as commercial space or community facilities. Very careful design will be needed to reflect the Conservation Area location and the setting of surrounding heritage assets. Support will be given for incorporation of unused or underused land and buildings adjoining the allocated site to be incorporated into a comprehensive scheme.

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Opportunities for low-car development should be explored, due to the site's proximity to town centre and local services.

Land west of Prestaller Farm, Beavor Lane (Axmi_24)

This land is allocated for 29 dwellings. Development at this location is likely to be dependent on neighbouring developments coming forward. Improvements will be needed to ensure pedestrian/cycle accessibility.

Commented [A53]: Text added following discussions with Devon County Council.

Commented [A54]: Text added following discussions with Devon County Council.

Honiton

5.5. The Local Plan strategy establishes Honiton as a Tier 2 settlement and as such as an appropriate location for future growth and development. Plan policy sets out land allocations for development and these are shown on the policies map along with other policy boundaries that are at the town.

Strategic Policy SD03: Honiton and its development allocations

The sites/areas listed below are identified on the Policies Map and are allocated for development.

Land west of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05)

Land to the west of Hayne Lane, on the western side of Honiton, is allocated for a mixed-use development to provide:

A. 310 homes; and

B. 14.6 hectares of land to accommodate employment and community uses.

This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. Southern parts of the site are in the East Devon National Landscape and this area will require very careful design to take account of its landscape setting. On the western edges the site is close to the historic village of Gittisham and particular sensitivity will need to be attached to preventing adverse heritage impacts. These southerly and westerly parts will be best suited for open space uses.

Commercial and employment uses will need to be concentrated to the north of the railway line bisecting the site with residential uses to the south. Community facilities,

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to include a shop or shops and a hall, will need to be provided within or next to residential parts of the development. There will be the need for attractive and safe pedestrian and cycle linkages between the southern and northern parts of the site (ideally utilising an existing passage under the railway that lies in a roughly mid-way point in the allocation).

It is expected that vehicular access to the residential development will be via the existing estate to the north (i.e. via Meadow Acre Road). Vehicular access to the employment development will need to come via Hayne Lane. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes, including bus services.

Commented [A55]: Text added following discussions with Devon County Council.

Former Millwater School at Bottom Road (Honi_06)

This land is allocated for 30 homes and will form a small-scale development in the southern part of Honiton.

Land adjacent to St Michaels Church and south east of Cuckoo Down Lane (Honi_07 and Honi_12)

This land is allocated for 101 homes and will form a residential extension on the southern side of Honiton. The site is in the Blackdown Hills National Landscape area and close to heritage assets, it will require very careful design to take account of its landscape setting and the setting of surrounding heritage assets. Therefore a high-quality comprehensive development scheme is required for the whole site. Development within allocation Honi_12 is expected to be dependent on development within allocation Honi_07 coming forward, as access needs to be from Weatherill Road. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Commented [A56]: Text added following discussions with Devon County Council.

Land at Ottery Moor Lane (Honi_10)

This land is allocated for 21 homes and will form a small-scale development on the northern side of Honiton.

Land at Middle Hill, Church Hill (Honi_13)

This land is allocated for 10 homes and will form a small-scale residential extension on the southern side of Honiton. This site is in the Blackdown Hills National Landscape and close to heritage assets, it requires very careful design to take account of its landscape setting and the setting of surrounding heritage assets.

Land at Hurlakes, Northcote Hill (Honi_14)

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This land is allocated for 30 homes and will form a small-scale residential extension on the eastern side of Honiton. Development requires safe access (for all road users) and a harmonised masterplan approach with GH/ED/39b.

Land at Kings Road (Honi_18)

This land is allocated for 136 homes and and will form a medium-scale residential extension on the eastern side of Honiton. Development proposals would need to consider a crossing of Kings Road to provide access to bus stops on Waterleat Avenue. The development will also need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Land south of Northcote Hill – north of the railway (GH/ED/39a)

This site is allocated for a total of 100 homes and will form a medium-scale residential extension on the eastern side of Honiton. Vehicular and pedestrian/cycle access improvements would be required. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Land south of Northcote Hill – south of the railway (GH/ED/39b)

This site is allocated for a total of 100 homes and will form a medium-scale residential extension on the eastern side of Honiton. Parts of the site are on more elevated ground and development will need to be sensitively planned to avoid adverse impacts on the nearby Blackdown Hills National Landscape area. Vehicular and pedestrian access improvements would be required, incorporating Northcote Hill into development. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Employment Land~~s~~ within the Existing Heathpark Industrial Estate~~s~~

Within the existing Heathpark industrial estate Plots 11A, 11B, 11D and 11M extending to 3.3 hectares are allocated for employment development.

Commented [A57]: Text added following discussions with Devon County Council.

Commented [A58]: Text added following discussions with Devon County Council.

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Ottery St Mary

5.6. The Local Plan strategy establishes Ottery St Mary as a Tier 2 settlement and as such as an appropriate location for future growth and development. Plan policy sets out land

allocations for development and these are shown on the policies map along with other policy boundaries that are at the town.

Strategic Policy SD04: Ottery St Mary and its development allocations

The sites/areas listed below as identified on the Policies Map are allocated for development.

Barrack Farm (Otry_01b)

This land at Barrack Farm, on the western side of Ottery St Mary, is allocated for around 70 new homes and 1.25 hectare of employment land provision. Archaeological assessment will be required prior to development commencing and will need to inform development proposals. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes. Development at this site should provide a harmonized access and interaction with Land at Thorne Farm (Otry_09).

Commented [A61]: Change made following discussion with Devon County Council.

Land at Thorne Farm (Otry_09)

This land, which lies west of the town and adjacent to the sports centre and school, will provide 90 new homes as well as space for an educational facility. Further flood risk assessment is required and an undeveloped buffer should be maintained to protect the County Wildlife Site and Ancient Woodland to the north west of the site.

Land at Salston Barton (Otry_10)

This land, which lies north and south of Salston Barton, is proposed for 20 houses. Archaeological assessment will be required prior to development commencing. This allocation must be supported by details of special measures to be taken to protect ancient trees and measures to ensure that safe cycle and pedestrian access to nearby facilities and Ottery St Mary town centre can be achieved.

Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes

Commented [A62]: Change made following discussion with Devon County Council.

Land at Bylands, Slade Road (Otry_15)

This garden site on the eastern side of the town at Slade Road is proposed for 8 houses.

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Land south of Strawberry Lane (GH/ED/27)

This land lies south of Strawberry Lane and is proposed for 60 houses. This allocation will need to be supported by further flood risk assessment work, details of special measures to be taken to protect ancient trees and measures to ensure that safe cycle and pedestrian access to nearby facilities and Ottery St Mary town centre can be achieved. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Commented [A63]: Change made following discussions with DCC.

Gerway Farm (Otry_21)

This land at Gerway Farm, off Sidmouth Road, is proposed for 70 houses. Archaeological assessment is required prior to development. Further flood risk assessment and measures to ensure that safe cycle and pedestrian access to nearby facilities can be achieved will be required.

Seaton

5.7. The Local Plan strategy establishes Seaton as a 'Main Centre' (Tier 2 settlement) and as such as an appropriate location for significant development to serve its own needs and that of wider surrounding areas. Plan policy sets out land allocations for development and these are shown on the policies map along with other policy boundaries that are at the town.

Strategic Policy SD05: Seaton and its development allocations

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

Land at Barnards Hill Lane (Seat_02)

This site is allocated for around 40 dwellings. A wide buffer should be provided to the northern boundary with tree planting/landscaping in the northern and western edges to soften the boundary with the countryside and create a well considered and designed northern edge to Seaton. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or

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mitigation measures will need to be identified and implemented. Development would need to provide a safe access onto Polar Tree Drive and also consider impacts on and proximity to the Polar Tree Drive/Barnards Hill Lane junction, with mitigation to improve road safety and/or calm traffic potentially required.

Commented [A64]: Change made following discussions with DCC.

Land to the south of Harepath Hill (Seat_03)

This site is allocated for around 75 dwellings. Built development should be concentrated in the less prominent eastern edge near Harepath Road, and/or to the south adjoining existing dwellings up to 55m contour line. Development should also respect the setting of the Grade II listed Harepath Farm. A wide buffer should be provided to the northern and western boundaries with tree planting/landscaping in the northern and western edges to soften the boundary edge with the countryside and create a well considered and designed northern edge to Seaton. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented. Development proposals should explore opportunities to improve bus stop infrastructure on Harepath Road, to promote sustainable travel.

Commented [A65]: Change made following discussions with DCC

Land off Harepath Road (Seat_05)

This site is allocated for around 130 dwellings and 2.2 hectares of employment land. The employment land should be located in the field immediately north of the existing Harepath Road Industrial Estate. The small areas of adjoining woodland to the north should be enhanced through additional planting. Tree planting/landscaping on the northern edge is required and will help soften boundary edges with the countryside. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented. Development proposals should explore opportunities to improve bus stop infrastructure on Harepath Road, to promote sustainable travel. Proposals should also consider pedestrian/cycle access onto Colyford Road and the Seaton – Colyford multi-use trail.

Commented [A66]: Change made following discussions with DCC

Seat_03 and Seat_05

Will need to come forward as a co-ordinated and comprehensive development that delivers the proposed large-scale mixed-use development on the northern edge of Seaton and seeks to deliver the long-standing need for a football pitch as part of a viable package of planning obligations.

Land west of Axeview Road (Seat_13a)

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This site is allocated for around 39 dwellings. Archaeological assessment through geophysical survey and field evaluation should be undertaken prior to the site being developed. Development must be sensitively located and designed to ensure that it avoids damage to archaeological remains and conserves the setting of Roman and Earlier Settlement remains at Honeyditches Scheduled Monument. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Commented [A67]: Change made following discussion with DCC.

Sidmouth

5.8. The Local Plan strategy establishes Sidmouth as a Tier 2 settlement and as such as an appropriate location for future growth and development. Plan policy sets out land allocations for development and these are shown on the policies map along with other policy boundaries that are at the town.

Strategic Policy SD06: Sidmouth and its development allocations

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

Land south-west of Woolbrook Road (Sidm_01)

This land is allocated for development of 127 new homes. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented. The development will need to maximise opportunities for localised improvements/ contributions to enhance sustainable travel modes.

Commented [A68]: Change made following discussions with DCC.

Land west of Two Bridges Road, Sidford (Sidm_06)

This land is allocated for development to the north of Sidford to accommodate around 30 new homes. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented. Development will need to play its part in supporting delivery of DCC's Sidbury - Sidmouth cycle route.

Commented [A69]: Change made following discussions with DCC.

Land east of Burscombe Lane / west of Windsor Mead (Sidm_31)

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This land is allocated for a small-scale development adjacent to the built edge to the north of Sidford and will accommodate around 15 new homes. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented. The site is within the East Devon National Landscape and is related to an area of predominantly single storey dwellings. The site will require very careful planning and use of materials to take full account of both the immediate context and views from the wider landscape, particularly when viewed from higher land to the east, and only single storey dwellings will be appropriate. It is expected that access for all road users would be off Windsor Mead.

Commented [A70]: Text inserted to reflect potential impact on the East Devon National Landscape

Commented [A71]: Change made following discussions with DCC.

Local centres

5.9. There are five local centres (Tier 3 settlements) that are explicitly identified as offering scope for development in the local plan, these are:

- Broadclyst;
- Budleigh Salterton;
- Colyton;
- Lympstone; and
- Woodbury.

5.10. Plan policy sets out land allocations for development at the local centres and these are shown on the policies map along with other policy boundaries that are at the local centres. At all local centres, in accordance with transport policies in the plan, all allocations should seek to maximise opportunities for localised improvements/ contributions to enhance sustainable travel modes.

Commented [A72]: Change made following discussions with DCC.

Broadclyst

Strategic Policy SD07: Development allocations at Broadclyst

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

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Land west of Whimple Road, Broadclyst (Brcl_12) combined with Land to east of Town End, Broadclyst (Brcl_29)

Development of these two sites, on the eastern side of the village, will need to come forward to an agreed Masterplan that provides for a comprehensive development scheme for both land areas. Vehicle access to the combined sites will need to be from Whimple Road with vehicle and pedestrian access from Brcl_12 linking through and into Brcl_29.

Area Brcl_12 - is to accommodate around 100 new homes and 0.6 hectares of employment land. Built form shall be focused on the land to the north west of Winter Gardens and south of Lake Farm with lower density development forming a frontage onto the road from Burrows Cross within the field to the north west of Winter Gardens. To the north of Brcl_12 there is scope to provide open space and habitat and other open space areas.

Area Brcl_29 – is to accommodate around 24 new homes and 0.1 hectares of employment land. Vehicle and pedestrian access routes will need to be provided to link into allocated land at Brcl_12. And there will need to pedestrian access to Green Tree Lane and /or Town End.

Commented [A73]: Change agree by Committee on 11 Dec 2024.

Budleigh Salterton

Strategic Policy SD08: Development allocations at Budleigh Salterton

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

Land at Barn Lane, Knowle, Budleigh Salterton (Budl_02)

This land on the northern side of Budleigh Salterton is allocated for 35 new dwellings. The site is located inside the East Devon National Landscape area and particular sensitivity will need to be attached to development proposals in respect of potential adverse landscape impacts. Site development will need to come forward with provision of safe footpath access to the Budleigh primary school. Site proximity to the Grade II* listed Tidwell House is such that significant care must be taken to avoid potential for adverse impacts on the property and its setting.

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~~**Budl_01 – Land south of Bedlands Lane and west of Dark Lane (Budl_01)**~~

~~Note that allocation of this land is subject to further assessment and is to only be allocated in the Publication plan subject to acceptability of a reasonable scheme/allocation boundary.~~

~~This land, south of Bedlands Lane and west of Dark Lane, is allocated for 50 dwellings~~

Commented [A74]: Allocation deleted in accordance with committee resolution on 11 Dec 2024.

Colyton

Strategic Policy SD09: Development allocations at Colyton

The sites/areas listed below are identified on the Policies Map and are allocated for development.

Land at Hillhead (Coly_02)

This site, to the west of Colyton, is allocated for 49 new homes. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented. Approach roads to this site are narrow, largely single width, and as such highway improvements may be needed with potential rerouting needed through the site.

Commented [A75]: Change made following discussion with Devin County Council.

Land adjacent to the Peace Memorial Playing Fields (Coly_06)

This site, adjacent to the Peace Memorial playing fields, is allocated for 12 new homes. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should inform the proposals for development of this site. However, more detailed flood assessment work and appropriate mitigation may be required as part of any proposal and should be assessed as part of a strategy informing proposals. Flood zone 3 land at the site may offer some scope for open space uses but should not form part of gardens, car parking or other features associated with individual plots.

To ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented. Development should explore the opportunity to widen the footway along frontage and deliver a suitable crossing, with best endeavours to avoid a crossroad type arrangement with Gribble Mead.

Commented [A76]: Change made following discussion with Devin County Council.

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Lympstone

Strategic Policy SD10: Development allocations at Lympstone

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

Lymp_01 - Little Paddocks, 22 Underhill Crescent, Lympstone

This site is allocated for 8 new homes. Additional tree planting should be provided along the southern boundary to mitigate the visual impact of the settlement edge upon the countryside beyond.

GH/ED/72a - Land at Meeting Lane, Lympstone

This site is allocated for 42 new homes. Tree planting along the western and northern edge should be provided to mitigate the impact upon Nutwell Park. A pedestrian link should connect with the existing footpath on Meeting Lane to the south. Development should explore opportunities for localised improvements/contributions (e.g at the Exmouth Road/Meeting Lane intersection).

GH/ED/73 - Land north west of Strawberry Hill, Lympstone

This site is allocated for ~~46~~ 42 new homes. Built development should not occur in the triangular area in the centre of site that is a "lost" orchard and ridge and furrow. This area should be reinstated as an orchard or otherwise provided as open publicly accessible open space. A pedestrian link should connect with the existing footpath on Meeting Lane to the north west. Development should explore opportunities for localised improvements/contributions (e.g at the Exmouth Road/Meeting Lane intersection).

Commented [A77]: Change made following discussions with Devon County Council.

Commented [A78]: Typo: should state 42 dwellings, as set out in the Lympstone Site Selection report. This reflect the outline appl 24/0301/MOUT approved subject to s.106.

Woodbury

Strategic Policy SD11: Development allocations at Woodbury

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

Land to rear of Orchard House, Globe Hill, Woodbury (Wood_06)

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This site is allocated for around 30 dwellings. The design and layout of development should reflect the key characteristics of Woodbury Conservation Area, adjoining to the east. Tree planting along the western boundary should be provided to soften the boundary edge with the countryside.

Land Off Globe Hill, Woodbury (Wood_09)

This site is allocated for around 28 dwellings. Development should include public open space and Green Infrastructure links (including the areas of flood zone 3) through the site to provide opportunities for the public to appreciate a key local landmark (Grade I listed Parish Church of St Swithun) and Woodbury Conservation Area. The design and layout of development should reflect the key characteristics of Woodbury Conservation Area, minimising the loss of existing mature hedgerow and trees.

Land at Gilbrook (Wood_10)

This site is allocated for around 60 dwellings. Development should incorporate pedestrian/cycle links into Gilbrook House and/or Beeches Close to the north, to offer direct access to the settlement centre. Development should incorporate tree planting that reflects the historic "lost" orchard that covered much of the site, with Green infrastructure opportunities along the flood plain in the eastern part of site. The design and layout of development should reflect the key characteristics of Woodbury Conservation Area to the north.

Land south of Broadway (Wood_16)

This site is allocated for around 70 dwellings. Suitable provision will need to be made for [pedestrians to safely cross the B3179 to access the pavement route to the village centre. Woodbury footpath 3, as it travels through the site, must be protected and enhanced.

Land east of Town Lane (Wood_20)

This site is allocated for around 28 dwellings. Development should ensure safe and suitable pedestrian access along Town Lane. Development should provide tree planting to extend the existing woodland to north, with a reduced building height or avoid built development in the eastern edge to minmise the impact on the surrounding countryside.

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Service villages

5.11. There are 23 'service villages' that are identified as offering specific scope for development in the local plan, these are:

1. Beer,
2. Branscombe,
3. Broadhembury,
4. Chardstock,
5. Clyst St Mary,
6. Dunkeswell,
7. East Budleigh,
8. Exton,
9. Feniton,
10. Hawkchurch,
11. Kilmington
12. Musbury,
13. Newton Poppleford,
14. Otterton,
15. Payhembury,
16. Plymtree,
17. Sidbury,
18. Stoke Canon,
19. Tipton St John,
20. Uplyme,
21. Westclyst,
22. West Hill,
23. Whimple.

5.12. All of the above villages have some local facilities that serve some of the needs of resident populations.

5.13. The above villages, except for Stoke Canon, have a Settlement Boundary around them, establishing in principle suitability for some development, essentially this can be expected to be around accommodating local need, and at some of them land is allocated for development through plan policies listed below.

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Broadhembury

Strategic Policy SD12: Development allocation at Broadhembury

The site/area listed below, as identified on the Policies Map, is allocated for development.

Land opposite the Village Hall (Brhe_09)

The site is allocated for 10 homes. This site is particularly sensitive in heritage and landscape terms and careful detailed assessment and design work will be needed to ensure that the design respects the special character of the area. The site should be landscaped to provide boundary screening appropriate to the edge of National Landscape location. There is an absence of a defined pedestrian access to bus stops/local amenities, so opportunities to enhance this should be addressed through development.

Any application to develop the site must include a study of the impact of development on the setting of the Church, which is a Grade I listed building, and the Conservation Area. Proposals must show how adverse impacts will be avoided and where appropriate impact on these heritage assets will be mitigated.

Commented [A79]: Change made following discussions with DCC.

Chardstock

Strategic Policy SD13: Development allocation at Chardstock

The site/area listed below, as identified on the Policies Map, is allocated for development.

Land off Green Lane, Chardstock (Char_04a)

This site is allocated for around 30 dwellings.

Site proposals must include landscaping to include provision of appropriate boundary screening in respect of long-distance views to and from the Blackdown Hills National Landscape area.

Opportunities to provide a connection for residents to Public Right of Way Chardstock Footpath 30 are encouraged.

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Clyst St Mary

Strategic Policy SD14: Development (Neighbourhood Plan led) at Clyst St Mary

Development of at least 72 dwellings will be accommodated at Clyst St Mary through allocations to be made through the Neighbourhood Plan.

Development at the village will need to come forward on sites that meet broader local plan policy requirements and that are well related, physically close to or abutting, the built form of the village.

Should development at Clyst St Mary have not started and progressed in a timely manner before 2030 there ~~Council~~ will be a review the need for allocations to be made in a future local plan (or similar plan document). After 2030, should housing development have not started, planning permission may be granted for windfall developments, outside of the settlement boundary for the village, to address part or all of the 72 dwelling shortfall where in compliance with wider local plan policies.

Dunkeswell

Strategic Policy SD15: Development allocation at Dunkeswell

The site/area listed below as identified on the Policies Map is allocated for development.

Broomfields, Dunkeswell (Dunk_05)

This site is proposed for 43 new homes.

A safe pedestrian footpath will need to be provided to enable access to local facilities. Ancient trees adjoining the site must be given specific protection through the development proposals.

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East Budleigh

Strategic Policy SD16: Development allocation at East Budleigh

The site/area listed below as identified on the Policies Map is allocated for development.

Land off Frogmore Road (Ebud_01)

This site in East Budleigh site is allocated for 22 new homes. A high-quality development scheme is required for this prominent site noting its location in the East Devon National Landscape area and proximity of the Syon House as a non-designated heritage asset. Crossing provision over the B3178 should be provided for pedestrians and overhead wires across the site should relocated underground.

Exton

Strategic Policy SD17: Development allocations at Exton

The sites/areas listed below as identified on the Policies Map are allocated for development.

Land west of Oaklands (Wood_01)

The site is allocated for around 14 dwellings. Suitable provision must be made for pedestrians to safely cross from the site across the A376 to enable easy access to facilities in the settlement, along with pedestrian/cycle links to Wood_28 adjacent to the south east.

Land north and east of Exton Farm (Wood_28)

The site is allocated for around 39 dwellings. Development will need to provide safe and suitable pedestrian and cycle access along Mill Lane south to the existing pedestrian crossing at the A376/Station Road junction, to enable easy access to facilities in the settlement. This pedestrian crossing should be upgraded to accommodate cyclists, to enable access the Exe Estuary Trail via Station Road. Development should provide pedestrian/cycle links to Wood_01 adjacent to north west. Development should include tree planting on the southern field to reflect their

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historic presence; and retain the hedgerow that disects the site, as far as practically possible. Development should address the existing flooding issues along Mill Lane.

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Feniton

Strategic Policy SD18: Development allocations at Feniton

The sites/areas listed below, as shown on the Policies Map, are allocated for development at Feniton.

Land at Burlands Mead (Feni_05)

Land and buildings at Burland Mead is allocated for around 42 dwellings.

Land adjacent to Beechwood (Feni_08)

Land adjacent to Beechwoods is allocated for around 60 dwellings. Careful designed and implemented boundary treatment on the eastern side of the site will be required to form a soft edge to the countryside beyond.

Land to the south east of Bridge Cottages (Otry_20)

Land to the south east of Bridge Cottages is allocated for employment use. The site extends in total to around 4.64 hectares but phased development will be required. A first northerly phase of land, extending to around 2 hectares, will need to be fully built-out before development will be allowed on a southerly phase.

Hawkchurch

Strategic Policy SD19: Development allocation at Hawkchurch

The site/area listed below as identified on the Policies Map is allocated for development.

Norton Store, Hawkchurch (Hawk_01)

This land is allocated for mixed-use redevelopment to retain the existing employment space and accommodate 12 dwellings plus a permanent location for the village shop

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and associated car and cycle parking and turning areas. The site should be landscaped to provide boundary screening appropriate to the location.

Kilmington

Strategic Policy SD20: Development allocations at Kilmington

The sites listed below, as shown on the policies map, are allocated for development:

Land east of George Lane (Kilm_09b)

Land east of George Lane is allocated for 23 homes. This site is in the East Devon National Landscape and requires very careful design to take account of its landscape setting. It is adjacent to Kilm_09a, which the made Kilmington Neighbourhood Plan, has allocated for 14 dwellings. A comprehensive development layout should cover both the Neighbourhood Plan allocated site (09a) and the local plan site (09b), with overall site proposal conforming with the design principles set out in Neighbourhood Plan policy. For Kilm_9b there must be buffer planting to the northern site boundary (along the A35) and footpath links to adjoining roads and paths, including to southern and northern site boundaries.

Land to the west and south west of the Old Inn (Kilm_10)

Land to the west and south west of the Old Inn is allocated for 5 homes. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be addressed through development proposals. This site is in the East Devon National Landscape and requires very careful design to take account of its landscape setting. A sensitively designed scheme will also be essential to avoid potential for adverse impacts on the listed adjoining public house. The preference is for highway access to this site to be gained from site Kilm_09b to the west.

Musbury

Strategic Policy SD21: Development allocation at Musbury

The sites/areas listed below are identified on the Policies Map and are identified for development.

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Land at Baxter's Farm (Musb_01a)

The site is allocated for ~~15~~ 15 new homes with 0.06 hectares of employment uses. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential and an exception test ha~~s~~ves been undertaken as part of the local plan.

A high quality scheme is required at this site which is likely to require some conversions and some new build. The Council has prepared a Development Brief for this site (though there is no longer an expectation of the site providing Gypsy and Traveller pitches).

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Newton Poppleford

Strategic Policy SD22: Development allocations at Newton Poppleford

The sites/areas listed below, as identified on the Policies Map, are allocated for development. A joint masterplan approach to the development of the two allocated sites would be appropriate.

Commented [A80]: Wording added to encourage coordinated development.

Land to the West of Badger Close (Newt_04)

The site is allocated for 28 dwellings. This site is in the East Devon National Landscape and requires very careful design to take account of its landscape setting. Elevated parts of the eastern side of the site are especially sensitive and will require very careful planning at the design stage. There will need to be a footpath link provided from this site to site Newt_05 and thereafter past the property 'Permarita' and then on to the King Alfred Way development. This and any existing paths linking to King Alfred Way must, as part of any development (if not already carried out), be made good and surfaced for use in all weather conditions. No houses shall be occupied until the full footpath link is provided and made available for use.

Land to the east of Exmouth Road (Newt_05)

The site is allocated for 27 dwellings. This site is in the East Devon National Landscape and requires very careful design to take account of its landscape setting. Elevated parts of the eastern side of the site are especially sensitive and will require very careful planning at the design stage. No house shall be occupied until a footpath is provided and made available for use to the north of the site past the property 'Pemarita' and

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then on to King Alfred Way. This and any existing paths linking to King Alfred Way must, as part of any development (if not already carried out), be made good and surfaced for use in all weather conditions. No houses shall be occupied until the full footpath is provided and made available for use.

Otterton

Strategic Policy SD23: Development allocation at Otterton

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

Land north of Behind Hayes (Otto_01)

The site is allocated for 10 homes. There are significant heritage and landscape constraints at this site and the northwestern part of the site is not appropriate for built development. This land should be kept open and made available as a community open space/orchard or similar use. Development should be very carefully designed to ensure that it is compatible with the National Landscape and adequately mitigates any impact on the surrounding heritage assets. Vehicular access needs to be to the east/Orchard Drive.

~~**Land adjacent to the North Star (Otto_02)**~~

~~This site is allocated for 8 new homes. A significant portion of this site is at risk of flooding and a level 2 Strategic Flood Risk Assessment and sequential test will need to be undertaken, by an applicant, to establish and confirm the acceptability of built development at this site and the details of any specific development scheme.~~

Commented [A81]: Text added following discussion with DCC.

Commented [A82]: Allocation deleted from plan as agreed through resolution on 11 Dec 2024.

Payhembury

Strategic Policy SD24: Development allocation at Payhembury

The site/area listed below, as identified on the Policies Map, is allocated for development.

Land adjacent to Markers Park -(Payh_03a)

This site is allocated for 15 homes.

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Design and layout of proposals should be appropriate to this village gateway location and sensitively and appropriately take account of the topography of the site and the heritage and any ecological significance of the marl pit (a non-designated heritage asset) which must be retained in the end proposals ~~and the topography of the site~~. Access should be designed to retain existing mature trees and minimise hedgerow removal, whilst ensuring highway safety. No house shall be occupied until a footpath connection is provided with existing pedestrian routes to the centre of the village. Landscaping which responds appropriately to the introduction of built form in this location shall be provided, including the introduction of substantial boundary screening along the southern boundary to maintain the rural character of the lane and the significance of the setting of the Grade II listed Glebe Farm on the southern approach.

Plymtree

Strategic Policy SD25: Development allocation at Plymtree

The site/area listed below, as identified on the Policies Map, is allocated for development.

Land north of the School (Plym_03)

Land is allocated for 30 new homes and a community facility.

This site is particularly sensitive in heritage terms and detailed assessment will be needed to ensure that an acceptable design solution is reached that respects the special character of the area and the setting of the heritage assets around the site. Footpath links to local facilities will be required as part of the development. The development will need to maximise opportunities for localised improvements/ contributions to enhance sustainable travel modes.

Commented [A83]: Change made following discussions with DCC.

Sidbury

Strategic Policy SD26: Development allocation at Sidbury

The site/area listed below, as identified on the Policies Map, is allocated for development.

Land south of Furzehill (Sidm_34)

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This site, to the south of Sidbury, is allocated for 43 new homes. Development of this site will enable the second phase of the Devon County Council proposed multi-use ~~path~~ trail (routes used by a combination of cyclists, pedestrians and by/for other movement), ensuring delivery of the entirety of the route from Sidford to Sidbury. Vehicle access to the site will be via A375. Development would be expected to play its role in delivering part of the Sidbury to Sidmouth cycle route through the allocation.

In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented.

The site is within the East Devon National Landscape and particular care will be needed to avoid adverse impacts, especially on higher westerly site parts where open space provision may be appropriate. Listed buildings are found to the north and east of the site and the Sidbury Conservation Area also lies to the north; proposals will need to be carefully designed to avoid detrimental impacts on these heritage assets.

Commented [A84]: On 11 Dec 2024 committee asked for the term 'multi-use trails' to be added to the 'glossary of terms' with a definition. But as this is the only reference in the plan it appeared more appropriate to just add reference here.

Commented [A85]: Text added following discussions with DCC.

Tipton St John

Strategic Policy SD27: Development allocation at Tipton St John

The site/area listed below, as identified on the Policies Map, is allocated for development.

Land South of Otter Close (Otry_04)

This site is allocated for up to 5 self-build homes and a new primary school. Development of the dwellings will only be allowed once building work on a new school on this allocation site ~~(on this site or elsewhere in or at the village)~~ is completed and occupied. Should a new school not be built in Tipton St John the village would not meet the thresholds for a Tier 4 settlement and new houses will not be permitted at this site.

Commented [A86]: Change made in accordance with committee consideration on 11 Dec 2024.

Commented [A87]: Amend to say "If the existing primary school closes and is not replaced…"

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West Hill

Strategic Policy SD28: Development allocations at West Hill

The sites/areas listed below, as identified on the Policies Map, are allocated for development. West_04 and West_18 should be brought forward as a collective development under and agreed masterplan, to ensure there is connectivity between both allocations. The developments will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Commented [A88]: Text added following discussion with DCC.

Land adjoining Wind Mill Lane (West_04)

The site is allocated for around 34 dwellings. The site will need to deliver safe and accessible walking and cycling routes through to the primary school, shop and other facilities at the centre of the village via West_18 and adjoining land.

Land north and east of Eastfield (West_18)

This site is allocated for around 30 dwellings. The site will need to deliver safe and accessible walking and cycling routes through to the primary school, shop and other facilities at the centre of the village via adjoining land. The woodland in the northern part of the site must be retained and enhanced.

Whimple

Strategic Policy: SD29: Development allocations at Whimple

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

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Land at Station Road (Whim_11)

This site is proposed for 33 new homes. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be taken into account in any development proposals. There may be a need for a site-specific Flood Risk Assessment at this site to assess the risk of fluvial and surface water flooding and therefore to inform development proposals.

A line of trees to the site frontage and two trees within the field are subject to Tree Preservation Orders. These must be retained in development proposals.

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Site layout should be planned to enable convenient east to west pedestrian and cycle links to the site frontage, but behind the existing hedge and protected trees. Development proposals should deliver a footway extension from the west and tie into the site. A pedestrian access opposite the Withy should be provided if compatible with protection of trees and highway safety. Careful attention should be paid to the setting of Slewton House, a Grade II listed building. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Land west of Bramley Gardens (Whim_08a)

The site is allocated for 50 homes and a community orchard. The residential development element of the scheme should be located south of the existing Bramley Gardens development. Provision of an orchard, that could include open space provision associated with new housing, will be encouraged on land to the north of the new houses. Access would need to be off Bramley Gardens. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

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Mitigating Climate Change



Chapter 6. Mitigating Climate Change

Reducing emissions and promoting low carbon and renewable energy development

6.1. The climate crisis is urgent, with the 2021 IPCC report[22] highlighting unprecedented warming and irreversible consequences. In response, East Devon District Council declared a climate emergency in 2019, committing to carbon neutrality by 2040 and endorsing the Devon Carbon Plan[23].

Strategic Policy CC01: Climate emergency

The East Devon target is to become carbon neutral by 2040, this overarching strategic policy for climate emergency requires developments to support East Devon becoming carbon neutral by 2040, through:

A. ~~Delivering~~ Supporting movement to net-zero development; and

B. Maximising opportunities for delivery of low carbon and renewable energy, district heat networks, and energy storage facilities.

Any development that by the nature of development design or subsequent operations will generate significant emissions will need clear justification for development that articulates how carbon saving approaches and methods, in design and operation, are incorporated into proposals.

This policy applies in the Cranbrook Plan area.

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[22] CCF-015 – IPCC Climate Change 2021: The Physical Science Basis, https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_FullReport_small.pdf [accessed 9th Jan 2025]

[23] CCF-014 – Devon Carbon Plan, https://devonclimateemergency.org.uk/wp-content/uploads/2022/11/Full-Carbon-Plan-22-11-2022.pdf [accessed 17th Jan 2025]

Justification for plan policy

6.2. This policy sets a target of achieving carbon neutrality in East Devon by 2040, aligning with the Council's climate emergency declaration. Subsequent policies in this chapter provide specific measures to achieve this overarching goal.

Strategic Policy CC02: Moving toward Net-zero carbon development

Commented [A92]: Change reflects direction of travel rather than absolute end position.

All new homes

All new homes (including conversions) will be required:

A. To meet energy efficiency requirements set out in the building regulation Future Homes Standard (FHS) 2025 or successor standards. If the FHS 2025 is not incorporated into Building Regulations by the date of Local Plan adoption, the draft standards as set out in - The Future Homes and Buildings Standards: 2023 consultation[24] ~~- GOV.UK (www.gov.uk~~) will be required in developments;

B. To be developed in a manner that ensures solar panels, heat pumps and other technologies (if not part of the initial development) can simply be fitted to and wired into new developments (with nil or minimal retrofitting); and

C. To be designed to avoid temperature discomfort as a result of rising temperatures.

Major non-residential new development

All major non-residential developments will be required to meet the latest BREEAM "Excellent" standard (or technical equivalent) unless it is demonstrated they cannot technically be complied with or render a proposal non-commercially viable. When the BREEAM "Excellent" standards are considered unachievable this should be supported by robust evidence.

All development

All developments will be required to demonstrate at the application stage that the relevant standards set out above will be achieved and that minimising the carbon footprint of the proposed development has informed the design and layout of the development. The agreed measures will be secured by either a condition or Section 106 agreement and developers will be required to submit a compliance certificate to demonstrate compliance following completion.

[24] CCF-021 – Future Homes and Buildings Standards: 2023 Consultation, *link to EDDC when available*

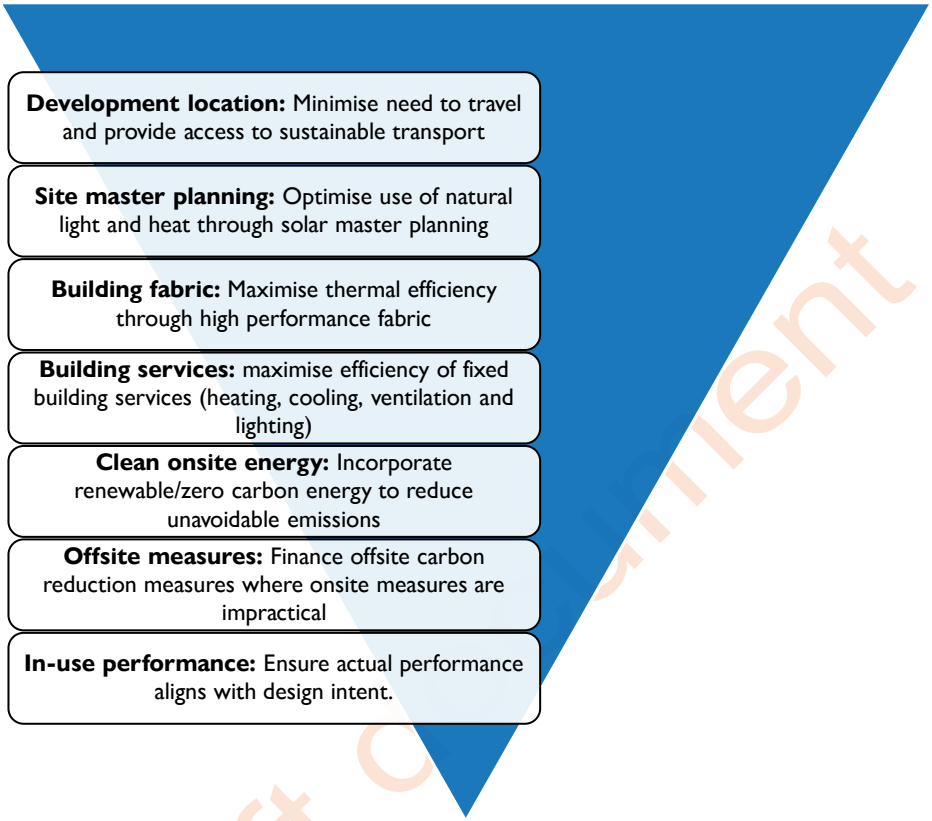
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This policy applies in the Cranbrook Plan area.

6.3. Ensuring new developments are energy efficient is fundamental to reducing carbon emissions. The policy follows the "energy hierarchy," prioritising building fabric improvements over renewable energy retrofits. Major non-residential developments must meet BREEAM “Excellent” standards, a widely recognised third-party accreditation for sustainability.

6.4. The policy aligns with national regulations and prioritises interventions to meet the net-zero target. Encouraging energy and carbon statements helps demonstrate a zero-carbon approach to construction and operation, promoting self-sufficiency in energy, waste, and water management.

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~~FIGURE 8~~FIGURE 7 The Energy Hierarchy

Promoting low carbon and renewable energy

6.5. Encouraging low carbon and renewable energy developments is crucial for achieving climate objectives and ensuring sustainable energy sources.

Strategic Policy CC03: Promoting low carbon and renewable energy

Proposals for low carbon and renewable energy generating and storage schemes within the district will be supported in the context of sustainable development and climate change, provided that:

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A. There are no significant adverse impacts on the local environment that cannot be satisfactorily mitigated, including individual and cumulative landscape and visual impacts, as well as the character of wider historic townscapes, landscapes and seascapes; protected species and sites of ecological/geological importance;

B. Any farmland that is used allows for the continuation on the site for some form of appropriate agricultural activity or bio-diversity use proportionate to the scale of the proposal; and

C. Appropriate plans and a mechanism are in place for the removal of the technology on cessation of energy generation/ storage, and restoration of the site to its original use or an acceptable alternative use.

Development located within or affecting the setting of National Landscapes and the undeveloped coast, unless visual and other adverse impacts can be shown to be minimal or nil, will~~,~~ only be permitted where evidence shows that exceptional circumstances exist to justify development. Such development should be, where acceptable, small scale giving due regard to the natural beauty of these areas.

Proposals for wind farms will only be allowed in defined areas as shown on the Policies Map.

Planning permission for fossil fuel electricity or other energy generation will only be granted where there is a clear and compelling need for the project that addresses a recognisable system failure, and all viable renewable energy options, including energy storage solutions, must be thoroughly explored and deemed unsuitable for fossil fuels schemes to progress.

This policy applies in the Cranbrook Plan area.

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Justification for Plan Policy

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6.6. The policy promotes low carbon and renewable energy technologies, such as geothermal, hydro, wind, solar, and anaerobic digestion systems, to ensure a sustainable energy supply. It identifies suitable areas for solar and wind energy developments while protecting sensitive areas, ensuring minimal environmental impact. The Low Carbon Study has identified areas suitable for these developments, excluding the most sensitive areas of the district.

6.7. Fossil fuel energy generation is only permitted in exceptional circumstances, such as for essential services like at hospitals that require backup power. This approach supports the transition to renewable energy sources, contributing significantly to the district's climate objectives and reducing reliance on fossil fuels.

Energy storage

6.8. Renewable energy generation often does not align with peak consumption times. Energy storage solutions are essential to balance this discrepancy and support the transition to renewable energy.

Strategic Policy CC04: Energy storage

Planning permission will be granted for electrical and other energy storage facilities to help achieve carbon neutrality and support renewable energy production and use in East Devon.

Proposals for development must have no significant and unacceptable adverse impacts on account of noise or environmental or amenity impacts. All schemes will need to be compliant with the most up to date guidance on fire safety and other health and safety matters.

Proposals should be located in or on the edge of built-up areas, and outside of protected landscape areas, unless alternative site options do not exist and locational requirements are so significant that a rural location is essential.

Proposals should not be in direct conflict with any policy in the development plan that allocates land for a different specified use or safeguards land unless the energy storage facility can be accommodated without compromising the policy intent and use of that land for the allocated purpose.

This policy applies in the Cranbrook Plan area.

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6.9. Energy storage technologies, including battery storage, allow surplus electricity to be stored and used when needed, facilitating the replacement of fossil fuels with renewable energy. This technology is crucial for a flexible energy system and reducing emissions to net zero. Battery storage systems are particularly important as we transition to electric vehicles and shift demand from peak times.

6.10. Favoured locations for storage are near suitable substations to provide grid services. The Low Carbon Study[25] highlights the importance of energy storage in achieving climate goals. Fire safety is a critical concern for battery energy storage systems (BESS). To address this issue, applications for new BESS projects must comply with the best available and most up to date guidance that exists. This should include, at the least, the latest National Fire Chiefs Council Guidance[26] though superseding guidance that may come through will also need to be complied with. Likewise best and most up to date guidance on any other safety matters or concerns should inform and be addressed in development proposals.

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[25] CCF-013 – 2020 Low Carbon and Climate Change Evidence Base for the Greater Exeter Strategic Plan, *link when uploaded to EDDC*

[26] CCF-018, Grid Scale Battery Energy Storage System Planning - Guidance for FRS, ~~2023~~: ~~https://nfcc.org.uk/wp-content/uploads/2023/04/Grid-Scale-Battery-Energy-Storage-System-planning-%E2%80%93-Guidance-for-FRS-April-2023.pdf~~ *link when uploaded to EDDC*



~~FIGURE 9~~FIGURE 8 Example Anesco battery storage facility (Source: Anesco, https://anesco.com/blog/2020/10/30/gore-street-energy-storage-acquires-battery-portfolio/~~*link?*~~)

Strategic heat networks

6.11. Strategic heat networks distribute heat from central plants to various consumers, offering a more efficient heating solution than individual boilers.

Strategic Policy CC05: Heat networks

For all major developments proposed within 1km of an existing heat network connection to the existing heat network should be provided.

When the connection is deemed undeliverable, evidence should be submitted to the planning authority's satisfaction to demonstrate why connections cannot be reasonably achieved. If the connection from the point of occupation cannot be provided, the development will be expected to incorporate, where feasible, infrastructure for future connection to the Heat Networks.

In addition, proposals above 1,200 homes or 10 ha of commercial floor space, if not connecting into an existing heat network will be required to provide their own network, unless it is demonstrated to be technically not achievable or significantly

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undermines commercial viability of development. Where allocation sites abut or are in close proximity to other allocation sites or developments, and the collective scale of development will exceed these thresholds, developers and applicants should work together to secure connections for the wider development schemes.

This policy applies in the Cranbrook Plan area.

6.12. Heat networks are essential for meeting climate targets, with the Committee on Climate Change suggesting that 20% of heating will need to come from district heating by 2050.[27] East Devon is well-positioned to embrace this trend, with existing networks at Cranbrook and Monkerton.

6.13. The Low Carbon Study[28] identifies opportunities for matching heat supply and demand and suggests that large-scale developments should investigate the potential for heat networks. The Local Plan's large-scale allocations present opportunities to utilise waste heat and connect to existing networks, increasing their efficiency and reliability.

Embodied carbon

6.14. The manufacture of building materials is a major source of greenhouse gases. Using existing building stock in development projects can significantly reduce embodied carbon.

Strategic Policy CC06: Embodied carbon

All development proposals should demonstrate actions taken to minimise embodied carbon and developers should retain existing buildings unless it can be demonstrated that refurbishment is either commercially unviable or impractical or has demonstrable comparative negative impacts.

Major development will be required to undertake an embodied carbon assessment, submitted as part of the Sustainability statement through a nationally recognised Whole Life Cycle Carbon Assessment procedure.

This policy applies in the Cranbrook Plan area.

[27] CCF-019 - The Future of Heating in UK Buildings, *link when uploaded to EDDC*

[28] CCF-013 – 2020 Low Carbon and Climate Change Evidence Base for the Greater Exeter Strategic Plan, *link when uploaded to EDDC*

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6.15. The environmental impact of producing construction materials is significant, with concrete alone responsible for 8% of global emissions[29]. The Royal Institution of Chartered Surveyors (RICS) estimates that 51% of the lifecycle carbon from a typical residential dwelling is emitted before the building is even occupied, and 35% for office developments.

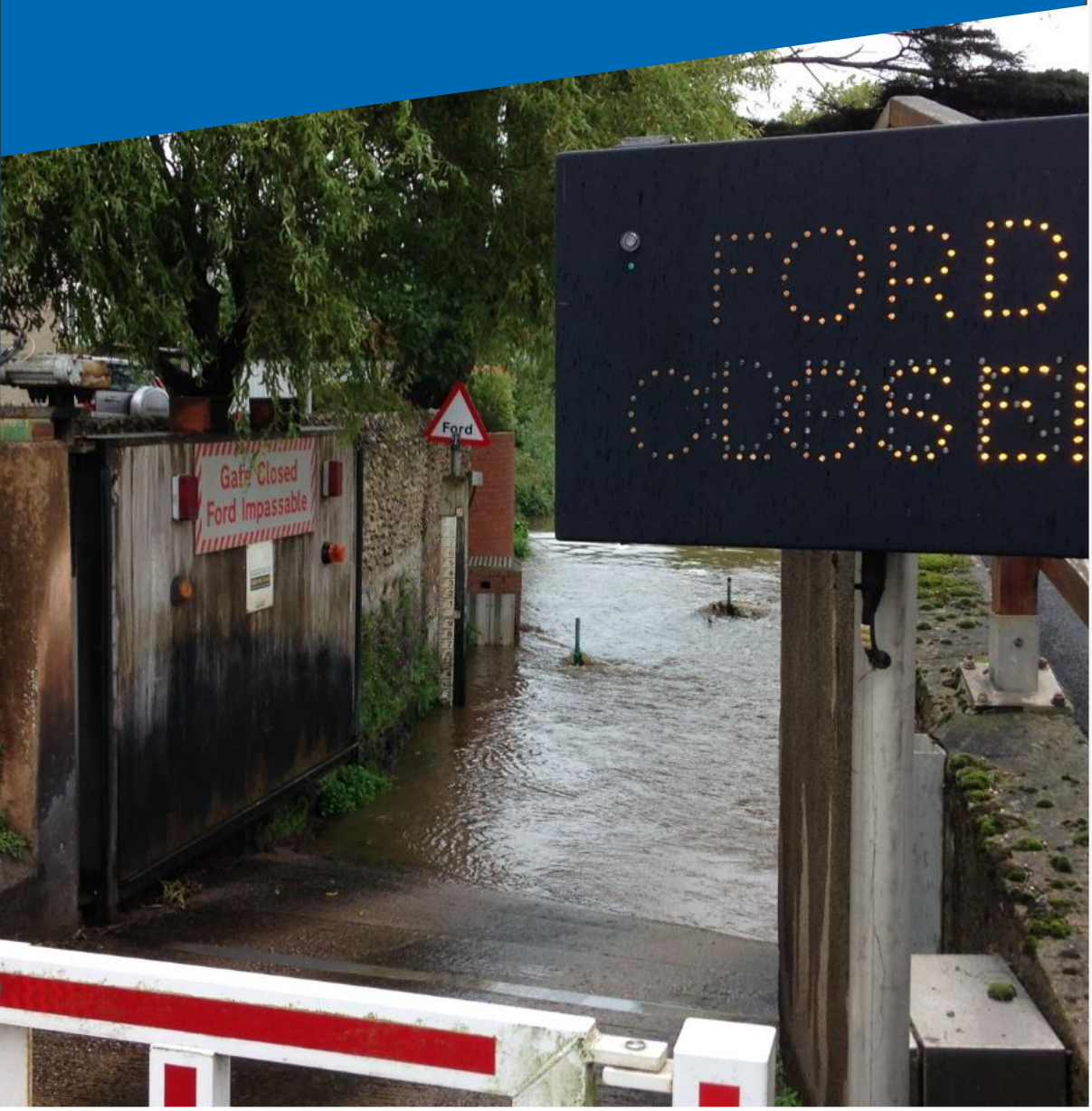
6.16. Embodied carbon assessments should follow an endorsed methodology, such as the RICS Professional Statement Whole Life Carbon Assessment for the Built Environment[30], to accurately measure and reduce lifecycle carbon emissions. This policy encourages the retention and refurbishment of existing buildings to minimise the carbon footprint of new developments.

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[29] CCF-025 - Making Concrete Change: Innovation in Low-carbon Cement and Concrete, *link to EDDC*
[30] CCF-020 – Whole Life Carbon Assessment for the Built Environment, *link to EDDC when uploaded*

Adapting to Climate Change

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Chapter 7. Adapting to Climate Change

Flood risk

7.1. National policy on flooding must be considered for developments at risk of flooding. The plan's policies and allocations are informed by a Strategic Flood Risk Assessment (SFRA)[31], which should also guide neighbourhood plans and development decisions. The SFRA provides a comprehensive analysis of flood risks from various sources, including rivers, the sea, and surface water, and incorporates future scenarios accounting for climate change.

7.2. Developers are encouraged to consult with East Devon District Council, Devon County Council, the Environment Agency, and South West Water early in the planning process to address flood risk, site-specific Flood Risk Assessments (FRAs), and appropriate mitigation measures. The Environment Agency is updating national flood risk information, which will include future climate change scenarios.- The update will be published in Spring 2025 and may necessitate an update to evidence and changes to the plan~~This new data will be incorporated into the SFRA and may necessitate changes to the plan~~.

Strategic Policy AR01: Flooding

All development should minimise the impact and mitigate the likely effects of climate change on existing and future occupants, together with the wider community and environment, through the delivery of developments and communities which are resistant and resilient to future floods. This will be achieved by:

A. Requiring development proposed in a flood risk location from any source to demonstrate that there is no sequentially preferable location and, if necessary, that development complies with the exception test (unless this has been undertaken through a site allocation in this plan);

B. Requiring a Flood Risk Assessment (where appropriate in terms of national planning policy and guidance) which demonstrates that the development, including

[31] CCF-002 – Strategic Flood Risk Assessment Level 1, *link to CFF evidence library page to allow access to all appendices*

Commented [A93]: Text. Last sentences, implies SFRA will be updated - is this the case. Plus, 1sdt sentence, should we say developers are encourage to consult us? Do DM staff want this?

Commented [A94R93]: The first sentence comes from the SFRA - I think DM should be involved but happy if you want to take out EDDC reference.

I thought that I got the second reference from JBA advice, but I can't find anything specific now. Suggest we alter the text to be more vague - 'The Environment Agency is updating national flood risk information, which will include future climate change scenarios. The update will be published in Spring 2025 and may necessitate an update to evidence and changes to the plan'.

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the access and egress, will be safe for its lifetime, without increasing or exacerbating flood risk elsewhere and where possible will reduce flood risk overall. For areas within 5 meters horizontal distance of Flood Zone 2, where there is no detailed modelling, assessment of this Zone with climate change will need to be undertaken in accordance with the most up-to-date Environment Agency hydrology, hydraulic modelling and flood risk mapping. Any flooding measures proposed in the FRA should respond to the specific requirements of the site and respect the character and biodiversity of the area. These FRAs should also identify opportunities for the development to provide wider community flood risk benefit through measures such as additional storage on site (oversized SuDS, natural flood management techniques, green infrastructure and green-blue corridors), and/ or by providing a Partnership Funding contribution towards any flood alleviation schemes;

C. Ensuring that space is provided on all development sites for the inclusion of SuDS designed to reduce the volume and rate of runoff to less than greenfield rates, as informed ~~but~~by the 'Sustainable Drainage System – Guidance for Devon'[32]. Surface water run-off should be managed as close to the source as possible. Preference will be given to systems that reduce pollution risks and contribute to the conservation and enhancement of biodiversity and green infrastructure where practicable. Within Critical Drainage Areas, SuDS should result in a reduction of existing runoff rates;

D. Protecting land required for flood management, including natural floodplains;

E. Not permitting proposals for basements in areas at risk of flooding; and

F. Where appropriate, the opportunity for Natural Flood Management in rural areas, SuDS retrofit in urban areas and river restoration should be maximised. Culverting should be opposed, and day-lighting existing culverts promoted through new developments.

Where a Level 2 SFRA has been undertaken on an allocated site, the 'Requirements and guidance for site-specific Flood Risk Assessment' set out in the relevant site sheet should be taken into account when submitting an application and designing a scheme.[33]

[32] CCF-024 – Sustainable Drainage System – Guidance for Devon, https://www.devon.gov.uk/floodriskmanagement/document/sustainable-drainage-system-guidance-for-devon-2023/ [accessed 16th Jan 2025]

[33] CCF-003 – Strategic Flood Risk Assessment Level 2, *link to CCF page in library when published*

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The SFRA has shown that some catchments are at a high risk of cumulative flooding. In these areas, development proposals should help to reduce flood risk overall by demonstrating that:

A. The design and layout of the proposed development safeguards any areas identified in the Natural Processes Mapping for floodplain reconnection, riparian woodland, additional floodplain woodland or runoff attenuation features;

B. Any FRA considers the potential cumulative effects of all proposed development and how this affects sensitive receptors; and

C. There is a suitable surface water management plan for storm events during construction to support the Construction Drainage Phasing Plan.

~~C.~~ This policy applies in the Cranbrook Plan area.

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Justification for policy

7.3. Certain areas in the District face flood risks from rivers, the sea, and surface water, which are likely to worsen with climate change. The NPPF advises directing development away from high-risk flood areas. This policy is based on the recommendations of the SFRA.

Water supply

7.4. Population growth, climate change, and environmental protection measures put pressure on water resources, contributing to water stress. This policy addresses these issues.

Strategic Policy AR02: Water efficiency

To minimise impact on the water environment all new dwellings should achieve the Optional Technical Housing Standard of 110 litres per day per person for water efficiency as described by Building Regulation G2[34].

This policy applies in the Cranbrook Plan area.

[34] CCF-022 – Approved Document G: Requirement G2 Water Efficiency, *Link to EDDC when uploaded*

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Justification for policy

7.5. Building Regulations set a water efficiency standard of 125 litres per person per day, with an optional requirement of 110 litres per day for new residential development. The water cycle study provides evidence for adopting the stricter standard of 110 litres per day in East Devon to address water stress.

Coastal change

7.6. East Devon faces significant challenges from coastal erosion and increased risk of permanent coastal flooding, exacerbated by climate change. While coastal defences may be appropriate in some areas, they are often costly and environmentally damaging. In many cases, allowing natural processes to occur is the best approach. This plan identifies potential impacts and develops policies to ensure risks are considered in development decisions.

Coastal Change Management Areas

7.7. We have collaborated with the University of Plymouth ~~footnote reference to report/outputs needed?~~ to predict coastal erosion and flooding, mapping areas vulnerable to coastal change over the next 20, 50, and 100 years[35]. This work, aligned with the National Planning Policy Framework, forms the basis for identifying Coastal Change Management Areas (CCMAs)[36]. Detailed assessments, such as Beach Management Plans, have refined these areas.

7.8. The Environment Agency will publish updated national flood and coastal erosion risk data in ~~December~~ January 2025~~4~~, which will be considered before finalising the plan for submission. Given the complexity of this topic, supplementary planning guidance is recommended to detail the practical implementation of the CCMA approach.

[35] CCF-008 – Coastal Change Management Areas Methodology Report, *link to EEDC*
[36] CCF-007 – Coastal Change Briefing Paper, *Link to EDDC*

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Policy AR03: Coastal Change Management Areas (CCMAs)

Within the Coastal Change Management Area (CCMA) defined on the Policies Map, proposals for new residential development, including the conversion of existing buildings, will not be permitted.

Applications for non-residential development within the CCMA will be assessed in relation to the most up-to-date evidence available for when coastal change can be expected so that:

0-to-20-year time horizon - In parts of the CCMA expected to be at risk within a 0-to-20-year time horizon (2020 to 2040), only the following developments will be allowed:

A. Temporary development directly related to the coast, such as beach huts, cafes, car parks or sites used for touring caravan and camping;

B. Temporary modifications to other existing commercial facilities where a positive link can be made to the local economy;

C. Mitigation measures for dealing with coastal change that are in accordance with the relevant coastal strategy; or

D. Nationally significant infrastructure projects related to offshore development that are constructed to withstand the impacts of the expected coastal change.

20-to-50 year time horizon

In parts of the CCMA expected to be at risk within a 20-to-50 year time horizon (2040 to 2090), in addition to the development allowed in the 0 to 20 years zone the replacement, relocation and adaptation of infrastructure, commercial and community uses will be permitted, providing they require a coastal location and provide economic and/or social benefits to the local community.

50-to-100 year time horizon

In parts of the CCMA expected to be at risk within a 50 to 100 year time horizon (beyond 2090), in addition to the development allowed in the 0 to 50 year zones, extensions to residential properties and householder applications may be acceptable.

All applications for development within a CCMA must show that it would not result in an increased risk to life or any property through the submission of a coastal change vulnerability assessment, which should be proportionate to the scale and nature of the development.

Commented [A95]: 100 years takes us way beyond 2090 - does the sentence make sense / need clarifying, or am I just being very pedantic!

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Planning permission for all development in a CCMA will be time limited according to the risk identified in the coastal erosion vulnerability assessment.

This policy does not apply in the Cranbrook Plan area.

Justification for policy

7.9. The NPPF requires plans to reduce the risk of coastal change by avoiding inappropriate development in vulnerable areas and identifying Coastal Change Management Areas (CCMAs). CCMAs are not necessary where the Shoreline Management Plan[37] policy is to 'hold the line' and can be maintained over the plan's lifetime. Generally, the centres of main coastal settlements are defended, so CCMAs are not identified for town centres. This policy aligns with national guidelines and will be supported by supplementary planning guidance for detailed implementation.

Relocation of uses affected by coastal change

7.10. Where evidence shows that certain existing uses are vulnerable to coastal change in the short term, relocation to safer areas may be allowed.

Policy AR04: Relocation of uses affected by coastal change

Where there is robust evidence to demonstrate that permanent homes (with unrestrictive occupancy) or community facilities, commercial or business uses that are considered important to coastal communities are likely to be affected by coastal erosion within 20 years of the date of the proposal, proposals for relocation/replacement, including outside of settlement boundaries, will be considered favourably subject to the following criteria:

A. The new development is located in an area at less risk of coastal erosion;

B. The replacement property is located close to the community from which it is displaced and has an acceptable relationship with it in terms of character, setting, local amenity and any special landscape designations;

[37] CCF-10 – Shoreline Management Plan, https://environment.data.gov.uk/shoreline-planning/shoreline-management-plan/SMP16#actionplan [accessed 13th Jan 2025]

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C. Overall, taking both the existing and proposed buildings into account, the proposal should not have an additional detrimental impact on the landscape, townscape or biodiversity of the area, taking into account any special designations;

D. The existing site is either cleared and restored with enhancements for nature conservation or put to use to benefit the local community within three months of the first use of the replacement. The future use of the site should be secured in perpetuity and provision made for public access to the coast where appropriate; and

E. In the case of a residential proposal, the gross ~~volume~~ floorspace of the replacement dwelling is no larger than the one it is to replace.

~~E.~~ This policy does not apply in the Cranbrook Plan area.

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Justification for policy

7.11. Some buildings and uses may be lost to the sea within the plan period. This 'rollback' policy provides flexibility for relocation if necessary.

Development affecting coastal erosion

7.12. The national and local approach to coastal erosion, as set out in the Shoreline Management Plan (SMP), is to defend main settlements and allow natural processes in rural areas. Large parts of the coastline are inscribed as a World Heritage Site, which relies on natural processes continuing.

~~Strategic~~ Policy AR05: Development affecting coastal erosion

Where compatible with the most up-to-date coastal policy (as expressed in the SMP or a strategy such as a beach management plan), the Council will promote proposals for sustainable coastal change management such as improvements to coastal defences or managed realignment, provided that they would not have an unacceptable adverse economic, social or environmental impact, including an unacceptable detrimental visual impact on a protected landscape.

To protect the integrity of the Dorset and East Devon World Heritage Site, the natural processes that created it will be allowed to continue, unless the safety and economic well-being of any coastal community would be undermined, provided that the implications of this for the World Heritage Site have been fully considered.

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Where there is a conflict between allowing coastal erosion and protecting coastal communities from that erosion both interests will be recognised and wherever possible impacts will be mitigated where they arise.

Schemes that are incompatible with coastal policy are will not be supported.

This policy does not apply in the Cranbrook Plan area.

Justification for policy

7.13. This policy balances the need for protective measures with the integrity of the World Heritage Site, which relies on coastal change processes. Both interests will be assessed in planning proposals to guide decision-makers and determine mitigation measures. This policy is relevant for applications like rock groynes/islands in beach management plans.

Links to marine planning

7.14. The NPPF requires local plans to consider the UK Marine Policy Statement and marine plans. The South Marine Plan[38] covers marine activities and overlaps with land planning in the intertidal zone. No conflicts have been identified between the marine and local plans.

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[38] CCF-023 – South Marine Plan, https://www.gov.uk/government/publications/the-south-marine-plans-documents [accessed 13th Jan 2025]

Meeting Housing Needs



Chapter 8. Meeting Housing Needs

8.1. This strategic policy aims to meet the housing needs of East Devon by providing a mix of decent, affordable homes that are safe, secure, and adaptable to changing needs.

Strategic Policy HN01: Housing to address needs

All proposals for housing, including those affecting the existing housing stock, will contribute to creating sustainable, inclusive and mixed communities in East Devon. This will be achieved by providing an appropriate mix of decent, good quality homes which meet identified needs for housing as identified in a neighbourhood plan, local needs assessment or other evidence document over the plan period, at locations consistent with the settlement hierarchy and the spatial strategy.

To achieve this the Council will:

A. Seek to maximise the delivery of affordable housing across East Devon in order to meet identified needs of people who are not able to access the general housing market;

B. Support proposals for the development of specialist accommodation that increase choice, including for older, vulnerable and disabled residents;

C. Support development of dwellings most suited to younger people noting the importance of ~~homing,~~ housing to support~~ing~~ and nurtur~~eing~~ a younger workforce ~~in the district~~;

D. Seek the use of good quality adaptable housing designs that provide flexible internal layouts and will allow for cost-effective alterations to meet changing needs over a lifetime and reduce fuel poverty;

E. Work with developers, registered providers, landowners and relevant individuals or groups to address identified local demand for self and custom build homes as identified in the East Devon Self and Custom Build Register; and

F. Support the retention and improvement of private rented accommodation, the provision of shared accommodation for single people, and proposals for the development of community-led housing schemes.

Proposals for housing development will be supported where they broaden choice and reflect and respond to the existing and future needs as identified in the Local Housing

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Needs Assessment or successor documents, and in up-to-date local housing need evidence assessments.

Proposals for housing development will provide a mix of house types, tenures and sizes appropriate to the area. This will be subject to the ability of a site to accommodate a mix of housing, and relevant, up to date evidence of market conditions. Housing mix will be achieved by:

A. Inclusion of affordable housing to meet affordable housing needs over the plan period, particularly the needs of younger people.

B. A range of housing suitable for households with specialist needs, including:

1. Dwellings for older people who want to retain independent living;
2. Adaptable and accessible housing and wheelchair user housing;
3. Use Class C2 accommodation including care homes.

C. Market housing for rent as well as for home ownership.

D. Serviced plots of land for self-build and custom housebuilding.

E. Gypsy and Travellers and Travelling Showpeople accommodation.

~~F.~~ This policy applies in the Cranbrook Plan area.

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Justification for policy

8.2. The policy ensures housing development addresses local needs, supporting sustainable, inclusive communities. It aligns with national policy requirements and provides a framework for other housing policies, avoiding duplication. The policy aims to deliver affordable housing, specialist accommodation, and adaptable designs to meet diverse and evolving needs. Key evidence is provided by the Local Housing Needs Assessment[39] ~~2022~~, which identifies local housing demands and needs for specific groups.

[39] HOU-002~~1~~ – Local Housing Needs Assessment - https://eastdevon.gov.uk/media/3724890/east-devon-lhna-final-accessible-160922.pdf

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Affordable housing

8.3. Affordability and lack of sufficient affordable housing are major issues in East Devon, with high house prices and rents. This policy aims to increase affordable housing, particularly for young households~~, in line with national and local plans.~~

Strategic Policy HN02: Affordable housing

To foster balanced and mixed communities affordable housing will be required on all developments, unless exempted under this policy, with a capacity of 5 or more dwellings in designated rural areas and 10 or more in non-designated rural areas. Specifically included under policy- are schemes for specialist housing for older people, which must provide affordable housing, where the site is delivering self-contained units (C3 and C2). Provision must accord with the levels set out below.

Location	Affordable housing as a percentage of the site total	Tenure mix of the affordable housing requirement
Second new community	New community % to be defined through bespoke viability work for the new community – to be defined through further Reg 19 consultation.	New community % to be defined through bespoke viability work - see further Reg 19 consultation.

Commented [A96]: Changes in this policy confirm that older persons open market housing must provide affordable housing and also to clarify the % provision of affordable housing at differing locations.

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Rest of East Devon (**excluding** those parts of the Cranbrook Plan area that fall within Cranbrook Plan Built-up Area Boundaries)	**35% affordable housing at:** • Any site allocated for development at the West End (see plan chapter 5) • Any ~~development~~ allocated site in Sidmouth and Budleigh Salterton, as ~~defined by~~ falling within the settlement boundaries. • Any windfall site across any part of East Devon, inside or outside settlement ~~that~~boundaries, that are ~~is~~ not allocated for housing development ~~and that comes forward as a windfall site~~. **30% affordable housing at:** • All other local plan allocated sites (with the exception of at Axminster). • **25% affordable housing at:** • Axminster, as ~~defined by~~ falling within the S~~s~~settlement ~~b~~Boundary.	• 65% Social Rent • 35% Intermediate or other forms of affordable housing At Axminster there will be flexibility, through consideration of viability assessments and where schemes are non-viable, to vary tenure percentages.	

Affordable housing secured through policy must:

A. Remain affordable in perpetuity. Legal agreements will make provision for achieving clawback on long term, phased schemes if affordable housing is converted to another tenure;

B. Be provided on-site and dispersed in small clusters across the site in a way that is indistinguishable in terms of design and materials from any market housing.

Off-site provision or financial contributions will only be acceptable where on-site provision cannot be achieved or is non-viable or it can be clearly established that off-site provision will generate better affordable housing delivery outcomes.

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Affordable housing should provide a mix of property sizes and types across the site, demonstrating how the site responds to robust, up to date evidence about housing need.

Where the requirements set out in this policy are not proposed to be met, applicants must submit development viability evidence to justify departure. Where a lower percentage level~~,~~ or differing tenure mix~~,~~ of provision is agreed on viability grounds developers will be required to enter into an agreement that allows affordable housing contributions to be made in the future should higher levels become viable (e.g. through an 'overage' clause). The Council will also reappraise viability on subsequent phases of large schemes.

Where Build to Rent schemes are proposed as part of the mix, at least 20% will need to be affordable private rent homes provided on site at a level of at least 20% discount. All homes on the scheme will be managed collectively by a single build to rent landlord.

Residential institutions (including C2 care homes and student accommodation) and gypsy and traveller accommodation are exempt from this policy.

This policy applies to those parts of the Cranbrook Plan area that fall outside of the Cranbrook Plan Built-up Area Boundaries.

Justification for policy

8.4. This policy ensures the delivery of affordable housing to support balanced and mixed communities. It aligns with national and local policies, addressing the need for affordable homes due to high prices and rents. The policy specifies affordable housing requirements for different areas and types of development, ensuring affordability in perpetuity and integration with market housing. Off-site provision or financial contributions are considered only when on-site provision is unfeasible. The policy is supported by local evidence from the East Devon Local Housing Needs Assessment[40] ~~2022~~, ensuring it meets the district's needs.

[40] HOU-002~~1~~ – Local Housing Needs Assessment - https://eastdevon.gov.uk/media/3724890/east-devon-lhna-final-accessible-160922.pdf

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Housing to meet the needs of older people

8.5. This policy aims to widen housing choices for older people in East Devon by securing a diverse supply of market and affordable housing, including specialist accommodation.

Policy HN03: Housing to meet the needs of older people

The Council will support development that widens choice by securing a more diverse supply of market and affordable housing for older people in East Devon. Specialist affordable housing for older people, falling under this policy, will specifically include:

A. Residential care homes and nursing homes;

B. Extra care housing or housing-with-care;

C. Retirement living or sheltered housing;

D. Age-restricted general market housing.

Any development proposals with housing to accommodate older people will need to:

1. Demonstrate how the design and layout addresses the health and well-being needs of older people including, where appropriate to the proposal, those with dementia and other long-term conditions;
2. Locate all older person housing within 400 meters walking distance of local facilities and shops;
3. Be well-served by public transport;
4. Have high levels of accessibility with flat or relatively flat neighbouring topography, dropped kerbs and pedestrian road crossings to promote access by ambulant older people, wheelchair users and mobility scooters;
5. Provide adequate communal facilities, including on-site accommodation where required, for essential staff;
6. Be supported by a Care Needs Assessment to justify the development proposal's scale, tenure and accommodation type.

Planning applications for different types of specialist housing for older people, will be determined on the basis that:

Use Class C3 (dwellings) - Market accommodation for older people in the form of age restricted general market housing, retirement living or sheltered housing and extra care housing or housing with care are in Use Class C3 (dwellings);

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Use Class C2 - Residential care home and nursing home accommodation (including end of life/hospice care and dementia care home accommodation) are in Use Class C2;

The Use Class of other specialist housing products will be determined taking into consideration the level of care and scale of communal facilities~~:~~.

All general housing proposals, subject to commercially viability, will be required to deliver specialist housing for older people as follows:

1. Schemes for 50 to 199 dwellings should include at least 10% of dwellings on-site as specialist older person dwellings (Use Class C3);
2. Schemes for 200 or more dwellings should include at least 10% as on-site as specialist older person dwellings as either C3 dwellings and/or C2 equivalents.

Planning permission that would result in the loss of specialist elderly person housing will be refused unless:

1. Evidence demonstrates that there is no longer a need in East Devon for that type of housing; and
2. The housing cannot be converted to meet other types of older person need, or that conversion, remodelling, or redevelopment to specialist housing to meet other social care and health needs is not viable.

~~2.~~ This policy applies in the Cranbrook Plan area noting that there may be viability impacts at Cranbrook that will need to be taken into account at planning application stage. .

Commented [A97]: Why not C2 also here (admittedly unlikely due to scale)?

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Justification for policy

8.6. This policy addresses the growing need for diverse housing options for East Devon's ageing population. It supports the development of specialist housing, such as care homes and extra care housing, ensuring these are well-designed, accessible, and located near local facilities.

8.7. The policy requires developments to demonstrate how they meet the health and well-being needs of older people, including those with dementia. It also mandates a mix of housing types and sizes, with a minimum percentage of specialist housing in larger developments. The policy aligns with national guidelines and local evidence, including the Local Housing Needs Assessment 2022, to ensure it meets the district's needs. The needs of older people are diverse and may change over time. Their health, lifestyles, income and wealth differ greatly, as will their housing needs. Offering older people a better choice of accommodation to suit their changing needs helps them to live

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independently for longer within their communities. Given this, there is an increasing demand for housing that is specialised for older people, with a requirement for both open market and affordable provision.

8.8. It is, however, noted that some older people may not want or need specialist housing, at least not immediately, but prefer to stay or move to general housing that is already suitable, including homes that can be adapted.

8.9. Based on the Refresh of the Commissioning Strategy for Extra Care Housing 2015 by Devon County Council, the projected demand for extra care housing is 522 units in East Devon (excluding Cranbrook) up to 2033.

Commented [A98]: Text added to give greater clarity to needs and provision for older people.

~~**8.7.**~~

Accessible and adaptable housing

~~**8.8.**~~**8.10.** This policy ensures new homes in East Devon are accessible and adaptable, meeting current and future needs by adhering to specific building regulations.

Policy HN04: Accessible and adaptable Housing

To ensure that new homes provide quality living environments for residents both now and in the future, the following standards from Building Regulations Approved Document M: Volume 1 (Access to and use of dwellings) (or replacement standards) will apply to new dwellings, subject to consideration of site suitability and site viability:

A. 100% of all new dwellings will meet building regulation M4 (2) requirements (accessible and adaptable dwellings);

B. 100% of all new specialist accommodation for older people will meet regulation M4 (3) requirements (a) or (b) (wheelchair user dwellings);

C. 100% of new specialist accommodation for older people will meet regulation M4 (3) (2) (b) requirements (wheelchair accessible dwellings) for those dwellings where the local authority is responsible for allocating or nominating a person to live in a dwelling;

D. At least 5% of all new affordable housing for rent will meet building regulation M4 (3) (2) (a) requirements (wheelchair adaptable); and

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E. At least 5% of all new affordable housing for homeownership will meet regulation M4 (3) (2) requirements (a) or (b) (wheelchair user dwellings).

When providing wheelchair user housing, early discussion with the Council is required to obtain the most up to date information on specific need for this type of housing in the local area.

This policy applies in the Cranbrook Plan area.

Justification for policy

~~8.9.~~8.11. This policy ~~mandates~~ requires that all new dwellings meet accessibility and adaptability standards, supporting residents with varying needs. It aligns with the government's approach to sustaining people at home and requires compliance with Building Regulations M4(2) and M4(3)[41].

~~8.10.~~8.12. The East Devon Local Housing Needs Assessment 2022 highlights the growing need for accessible homes due to an ageing population. By 2040, an additional 12,959 households will need either adaptations to their existing homes or new accessible housing.

~~8.11.~~8.13. The policy specifies that 100% of new dwellings must meet M4(2) requirements, ensuring they are accessible and adaptable. For specialist accommodation for older people, 100% must meet M4(3) requirements, with specific provisions for wheelchair user dwellings.

~~8.12.~~8.14. At least 5% of new affordable housing for rent and homeownership must meet M4(3) requirements, addressing the need for wheelchair adaptable and accessible homes. Early discussions with the Council are required to obtain up-to-date information on the specific need for wheelchair user housing in the local area.

~~8.13.~~8.15. The policy aligns with national guidelines, including the NPPF and PPG[42] on Housing for Older and Disabled People. It ensures that plans use optional technical housing standards to bring forward an adequate supply of accessible

[41] HOU-018 – The Building Regulations 2010 Approved Document M Volume 1: Dwellings, *link to EDDC library when available*

[42] KSD-007 – Planning Practice Guidance (PPG), https://www.gov.uk/government/collections/planning-practice-guidance [accessed 13th Jan 2025]

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housing. The percentages and circumstances for these requirements are guided by evidence from the Local Housing Need Assessment 2022 and the Local Plan spatial strategy.

~~8.14.~~8.16. The Council's ability to require wheelchair accessible housing is limited to dwellings where it is responsible for allocating or nominating residents. These are typically affordable dwellings for social or affordable rent, secured through S106 legal agreements. Planning applications should include an Affordable Housing Statement detailing the number and types of affordable housing units.

~~8.15.~~8.17. Where site conditions or viability preclude the provision of specialist housing, the policy requires that housing meets at least M4(1) standards. This ensures that all new housing provides a basic level of accessibility, even if higher standards cannot be met.

Self-build and custom build housing

~~8.16.~~8.18. This policy supports custom and self-build housing to meet diverse housing needs, encourage high-quality design, and provide opportunities for individuals to build their own homes.

Policy HN05: Self-build and custom build housing

As part of meeting housing needs, securing greater housing diversity and encouraging high quality design, proposals for custom and self-build housing, to be occupied by those persons commissioning or undertaking the construction, will be supported.

At least 5% of dwellings on sites planned to accommodate 20 or more homes must be delivered as serviced custom and self-build plots.

The agreed plots should:

A. Be actively marketed to individuals and/or custom build companies ~~(as appropriate)~~ in accordance with a marketing and pricing strategy that shall be agreed in writing with the Local Planning Authority in advance of a plot/s being first marketed. All plots shall be marketed at a reasonable price to reflect market conditions for at least 24 months from being fully serviced and developable. Any plots that have not been sold after 2 years of being continuously marketed in accordance with this policy shall be made available for development on the open market;

B. Have suitable road access delivered at an early stage in the development;

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C. Be of a size that reflects local demand and, where more than one plot is provided, a variety of sizes should be offered to reflect the range of local demand; and

D. Be offered for sale with no legal or physical restrictions that would prevent immediate purchase and development;

On sites of over 250 dwellings or more, a proportion of plots must be made available for affordable housing, to be secured through legal agreement, subject to viability.

On sites of over 100 dwellings or more, design codes should be used flexibly to encourage high quality housing design and the agreed design code should be used to provide 'plot passports' that provide a simple, succinct summary of each plot as a reference point for the purchaser.

All self and custom-built housing must be completed within 3 years of the self or custom builder purchasing the serviced and developable plot.

This policy applies to all parts of the Cranbrook Plan area that fall outside of the Cranbrook Plan Built-up Area Boundary.

Commented [A99]: Very vague - also how many people high up on the priority list for affordable housing can get a mortgage for a self build??

Justification for policy

~~8.17.~~8.19. Custom and self-build housing contributes to the overall housing supply, offering an alternative to mainstream housing delivered by large developers. It allows individuals to tailor homes to their specific needs and can lead to cost savings, as there is no developer profit. This approach can boost housing supply, diversify land use, and widen housing choices.

~~8.18.~~8.20. Communities benefit from custom and self-build homes through improved design, build quality, and environmental sustainability. These homes often use modern construction methods and high specifications, enhancing the sustainability of the housing stock. Additionally, self-build projects can support local businesses and create employment opportunities by engaging local tradespeople and supply chains.

~~8.19.~~8.21. This policy does not apply to off-plan housing, where homes are purchased before construction without buyer input into design and layout. Instead, it focuses on self-build models, including individual projects, community collaborations, and supported community self-builds. These models can involve various organizations, such as Community Led Housing Groups, Community Land Trusts, Co-operatives, and Cohousing groups.

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~~8.20.~~8.22. Under the Self Build and Custom Housebuilding Act 2015[43], the Council maintains a register of individuals seeking serviced plots for self-build and custom housebuilding. The Council must consider this register and provide suitable development permissions to meet identified demand. The Act defines self-build and custom build housing, ensuring clarity and consistency in policy application.

~~8.21.~~8.23. Since 2016, the Council has kept a register[44] of people interested in building their own homes in East Devon. This register provides insights into the level of interest, budget constraints, and location preferences of potential self-builders.

Sub-dividing or replacing existing buildings and dwellings

~~8.22.~~8.24. This policy supports the sub-division and replacement of existing dwellings to meet housing needs, reduce carbon footprints, and reuse existing resources within established communities.

Policy HN06: Sub-dividing or replacing existing buildings and dwellings

Inside or outside of settlement boundaries any ~~Any~~ residential sub-division of existing dwellings or buildings must:

A. Avoid any materially adverse impact on the character and amenities of the surrounding area or on the existing building;

B. Minimise hard surfacing of front gardens and ensure hard surfaced areas are permeable and/or discharge to a soakaway (subject to soil conditions being suitable);

C. Ensure that adequate space is provided for bicycle/mobility scooter storage; and

D. Provide an adequate external area for amenity and private use, car parking, waste/recycling storage and for any shared use area such as outdoor drying of washing.

Commented [A100]: Change made in accordance with committee consideration on 11 Dec 2024.

[43] HOU-016 – Self-build and Custom Housebuilding Act 2015, https://www.gov.uk/guidance/self-build-and-custom-housebuilding [accessed 9th Jan 2015]

[44] HOU-017 – Self-build and Custom build Monitoring, https://eastdevon.gov.uk/planning/planning-policy/housing-issues/self-build-and-custom-build/monitoring/#article-content

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Replacement of existing dwelling or conversion of an existing building outside of a Settlement Boundary - exceptionally, where a replacement dwelling or building conversion can justified outside settlement boundaries all of the above sub-division considerations must be met, and the following criteria must also be met:

A. Prior to the first occupation of any replacement dwelling, the dwelling which is to be replaced must be demolished;

B. Any replacement dwelling, or building works associated with conversion, must be positioned on the footprint of the existing dwelling, unless there are clear planning or environmental benefit to justify an alternative location within the existing curtilage;

C. The height, scale and massings hall be in keeping with the character of the area and ~~of any replacement dwelling should be no higher than the dwelling to be replaced, and building works associated with conversion must not exceed existing building heights, unless it can be demonstrated that an increase in height will be compatible with and~~ not harmful to neighbouring residential amenities, the street scene or the wider landscape;

D. The ~~footprint~~ floorspace (including garages, outbuildings and any inhabitable space) of any replacement dwelling, or subdivided or converted building including any extension, must not exceed by more than 30% that ~~of the external volume~~ of the ~~dwelling~~ building to be replaced (or the building to be converted/subdivided); and

E. The curtilage of the proposed replacement, or subdivided or converted building including any extension, must be no greater in area than that of the existing dwelling/building.

~~E.~~ This policy applies to all parts of the Cranbrook Plan area.

Commented [A101]: Wording simplified and now majors on key concerns.

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Justification for policy

~~8.23.~~8.25. Self-contained flats from house conversions add valuable housing stock and meet changing needs. Reusing and converting buildings reduces the carbon footprint and promotes sustainable development. The policy restricts replacing existing buildings to exceptional circumstances, aligning with the embedded carbon policy.

~~8.24.~~8.26. For sub-divisions, the policy ensures developments avoid adverse impacts on the area, requiring provisions for storage, parking, and sustainable drainage. Replacement dwellings outside settlement boundaries must meet

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additional criteria, including demolishing the existing dwelling before occupation of the new one and limiting the height and footprint of the new dwelling.

~~8.25.~~8.27. The policy supports the Council's Housing Strategy and aligns with the NPPF's emphasis on sustainable development. It addresses affordability issues, particularly in rural areas, by retaining smaller dwellings. Certain developments, like the reuse of redundant buildings, are not subject to this policy but may be covered by other policies.

~~8.26.~~8.28. The policy promotes effective land use, boosting housing supply through subdivision and conversion. It reduces the risk of dwellings becoming vacant and derelict, preserving housing stock. The policy also mitigates environmental impacts, preserving the character and amenity of the area.

~~Replacement dwellings~~ Householder Annexes, Extensions, Alterations and Outbuildings

~~8.27.~~8.29. This policy supports householder annexes, extensions, alterations, and outbuildings to meet changing needs while maintaining the character and sustainability of existing dwellings.

Policy HN07: Householder annexes, extensions, alterations ~~and~~ or outbuildings outside settlement boundaries

Outside settlement boundaries p~~P~~roposals for ancillary or incidental annexes, extensions, alterations~~, and~~ or outbuildings, must relate well ~~relating~~ to the existing dwellings ~~shall~~ and must:

A. Be of a subordinate scale, form, and mass to the main dwelling and curtilage, and shall accord with the design principles of the Local Plan;

B. Be located entirely within the existing curtilage of the main dwelling; and

C. Not increase the habitable Gross Internal (floor) Area[45][46] of the original dwelling ~~dwelling~~ (as it was in 1945 or as built if after 1948) by more than 30%, unless the increase is required to enable the host dwelling to conform to nationally described

[45] Technical housing standards – nationally described space standard - GOV.UK (www.gov.uk)
~~[46][46]~~ ~~Technical housing standards – nationally described space standard - GOV.UK (www.gov.uk)~~

Commented [A103]: Text is not needed and policy could apply to redundant building reuse.

Commented [A104]: Text amended according to agreement at Committee on 11 Dec 2024.

Commented [A105]: I think it is unreasonable to limit the size of extensions on homes within the built up area boundary - also does this include loft conversions?

Commented [A106]: Text change clarifies what the original is.

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technical housing standards[2] for its original intended use. In exceptional circumstances, development may be considered where a minor increase above 30% is justified to improve design standards.

The development of annexes, extensions, alterations, and outbuildings, other than of small or incidental scale, will not usually be permitted where the host dwelling is:

A. An affordable dwelling; or

B. An agricultural worker's dwelling; ~~and~~

~~C.~~ ~~The development of these properties will need to be~~ Unless the proposal is fully justified in relation to the need for the additional accommodation and how this is necessary given the restricted use of the property.

A condition and/or legal agreement may be required to control future use as incidental or ancillary to the use of the main dwelling, preventing subdivision or use as a separate planning unit, in perpetuity. Permitted development rights for future extensions or outbuildings may also be restricted by condition.

This policy applies in the Cranbrook Plan area.

Commented [A107]: Text provides flexibility for small scale changes.

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Justification for policy

~~8.28.~~8.30. The Council receives many applications for householder extensions, alterations, annexes, and outbuildings. These developments help occupiers meet changing needs without moving.

~~8.29.~~8.31. This policy supports changing housing needs and aligns with the NPPF and PPG on effective land use. It reduces the carbon footprint by reusing existing dwellings and resources, ensuring developments maintain acceptable living standards within communities.

~~8.30.~~8.32. Residential annexes provide flexible accommodation that can adapt to changing family needs, supporting and caring for family members. Annexes should remain ancillary to the main dwelling, avoiding the creation of separate dwellings. They should not be so large that they undermine their subordinate role or become impractical.

~~8.31.~~8.33. Extensions, alterations, and outbuildings add diversity and flexibility to the housing stock but must respond positively to the context and character of existing areas. These developments should not lead to an increase in larger

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dwellings, reducing the availability of smaller housing and creating an imbalance. Extensions and subdivisions should not create additional dwellings in the countryside.

~~8.32.~~8.34. Permitted development rights allow certain extensions and outbuildings without planning permission if specific conditions are met. This policy addresses those ~~that~~cases that exceed these limitations, where planning permission will be required. ~~often requiring householder planning permission.~~

~~8.33.~~8.35. Annexes, extensions, alterations, and outbuildings should not cause unacceptable impacts on occupants or neighbours, such as issues with amenity, light, noise, privacy, and visual impacts.

Hostels and houses in multiple occupation

~~8.34.~~8.36. This policy supports the conversion of existing homes and buildings to hostels and Houses in Multiple Occupation (HMOs) while ensuring they meet specific standards to protect the amenities of occupants and neighbours.

Policy HN08: Hostels and houses in multiple occupation (HMOs)

In circumstances where planning permission is required for the conversion or change of use of existing homes, and buildings in other uses, to shared accommodation including hostels and houses in multiple occupation, permission will be granted where it can be demonstrated that all of the following matters are addressed:

A. **Privacy of existing homes and gardens of neighbours** - must be maintained and ensured for new occupiers. The existing home or building must be capable of conversion without causing harm to the amenities of future occupants, neighbours and the wider area;

B. **Vehicular access or car parking** – both in terms of highway safety or visual, noise or light impact on neighbours. Provision must be made for on-site car parking and cycle storage facilities, unless it can be demonstrated that the site is sustainably located with access to regular public transport or is within an ~~800 metre~~800-metre walking distance of a defined town centre;

C. **Service provision** – there should be sufficient space for communal areas ~~at an appropriate standard,~~ to accommodate adequate bin storage and collection, and accommodate other ancillary functions for the increased number of residents; and

D. **Living spaces and communal facilities** - are of a good standard and suitable for the intended occupiers, individually and in total

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To protect the existing small family housing stock, and to allow for adequate residential space standards in the proposed subdivided dwelling, the subdivision of existing properties of three bedrooms or less will not be permitted.

Applications for Hostels and Houses in Multiple Occupation will need to be supported by evidence on how a good standard of management will be provided.

The Council will resist the loss of existing hostels and HMOs, unless there is evidence of a lack of demand for this type of accommodation within the settlement, or there is viability and building condition evidence to demonstrate that retention and improvement of the accommodation is not viable or achievable.

This policy applies in the Cranbrook Plan area.

Justification for policy

~~8.35.~~8.37. HMOs are properties occupied by unrelated individuals sharing basic amenities. This policy ensures conversions to HMOs maintain privacy, provide adequate vehicular access and parking, and include sufficient communal areas. It also requires good living standards and management evidence.

~~8.36.~~8.38. To protect small family housing, the subdivision of properties with three bedrooms or less is not permitted. The Council will resist the loss of existing HMOs unless there is evidence of a lack of demand or viability issues.

~~8.37.~~8.39. The policy aligns with the NPPF and addresses the need for low-cost, private rented housing. It ensures HMOs meet planning and licensing requirements, protecting the health, safety, and welfare of tenants.

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Gypsy and traveller sites

~~8.38.~~8.40. This policy ensures the provision and safeguarding of sites for Gypsies, Travellers, and Travelling Showpeople, addressing their accommodation needs while integrating sites into the community and landscape.

~~Strategic~~ Policy HN09: Gypsy and traveller sites

~~New sites~~

Proposals for new permanent or transit gypsy, travellers or travelling show-people sites ~~(allocated and/or permissible or coming forward as windfall proposals)~~ or extensions of existing sites will need to meet all of the following:

A. To be located inside or adjoining a settlement boundary, or within 15 minutes travel time by safe, walking, cycling or public transport providing access to a range of services including school and health services;

B. To have a site size and have a number of pitches that is appropriate, and not over-large, in relationship to the nearest settlement in the settlement hierarchy and its range of services and infrastructure;

C. To not exceed 15 pitches as a maximum;

D. To be assimilated into the surrounding landscape without significant adverse effect;

E. To have acceptable vehicular access, on site turning, parking and servicing ~~can be achieved~~;

F. To be in locations that are not vulnerable to flooding or affected by any other environmental hazards that may affect the residents' health and welfare; and

G. To have access to essential utilities - water supply, sewerage, drainage, waste disposal. Where service connections are needed these need to be readily available on or close to the site.

Preference will be given to the expansion and intensification of existing sites, subject to maximum site threshold of 15 pitches. If expansion or intensification is impractical, then account will be taken of the cumulative impacts of additional sites on the character of the local area and on the local community.

In addition to meeting these requirements, planning applications for gypsy and traveller pitches, or plots for travelling Showpeople, on windfall sites in the countryside outside settlement boundaries must demonstrate:

Commented [A108]: Text amended to clarify that it applies to new sites and extensions to existing sites.

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A. The status of the applicant / intended occupant/s meeting -the national definition for gypsy, traveller or travelling showpeople and the pitch or plot will be occupied by at least one person with a strong local connection to East Devon district; and

B. There is a proven unmet need for new pitches or plots, having regard to the supply of deliverable pitches or plots and their availability to gypsies and travellers or travelling showpeople who have a strong local connection to the district.

Safeguarding sites

Existing authorised sites, sites with planning permission, and allocations for Gypsy and Traveller Use or for Travelling Showpeople use, will be safeguarded for the number of pitches/plots permitted.

If, in exceptional circumstances (such as long-term vacancy and a demonstrable lack of need), changes of use or redevelopment to non-Gypsy/Traveller or Travelling Showperson's accommodation use are permitted, then, if need exists in the District, suitably located and laid out alternative provision must be provided prior to the loss of the existing site or part of thereof.

This policy applies in the Cranbrook Plan area.

Justification for policy

~~8.39.~~8.41. The Gypsy and Traveller Accommodation Assessment (2024)[47] identifies a need for around 32 permanent pitches for Gypsies and Travellers and a joint protocol for transit needs. No additional plots are needed for Travelling Showpeople, as existing plots at Clyst St Mary are sufficient.

~~8.40.~~8.42. Fifteen permanent pitches will be provided at the new second community in East Devon, with at least 10 delivered during the plan period. Five pitches will be provided east of the M5 and south of the Exeter-Waterloo line. Fifteen pitches will be provided at the Cobdens and Treasbeare Expansion Areas in Cranbrook.

~~8.41.~~8.43. National policy requires the assessment of accommodation needs for Gypsies, Travellers, and Travelling Showpeople, setting pitch

[47] HOU-009 - East Devon District Gypsy and Traveller Accommodation Assessment (GTAA), https://eastdevon.gov.uk/media/gl0n5qkq/2024-09-30-east-devon-gtaa.pdf

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and plot targets and working with neighbouring authorities. The 2024 GTAA[48] provides detailed evidence of needs, showing existing pitches mainly in western East Devon. Most immediate needs arise from overcrowding and newly formed families on existing sites.

~~8.42.~~8.44. The GTAA recommends temporary stopping places for transit needs and identifies a need for 20 pitches for households meeting the planning definition, up to 8 pitches for undetermined households, and 4 pitches for households not meeting the planning definition. No additional plots are needed for Travelling Showpeople.

~~8.43.~~8.45. Planning policy requires identifying and updating a supply of deliverable sites for a 5-year period and developable sites for years 6-10. The Cranbrook sites are expected to meet initial requirements. Existing planning permissions and allocations will contribute to supply, ensuring families can remain locally. An additional site allocation east of the M5 will provide at least 5 pitches.

~~8.44.~~8.46. The Council does not anticipate a need for specific bricks and mortar housing for Gypsies and Travellers, as general housing provision will meet any such needs. Existing Travelling Showpeople sites, including those at Clyst St Mary, are sufficient to meet needs during this plan period.

Rural housing exception sites

~~8.45.~~8.47. This policy supports rural exception site housing proposals to provide affordable housing for local communities, ensuring developments are well-related to settlements and meet proven needs.

Strategic Policy HN10: Rural housing exception sites

Rural exception site housing proposals, excluding at Tier 1 and 2 settlements, that are ~~towns of 3,000 dwellings or more and~~ outside of settlement boundaries, will be ~~supported~~ permitted but must meet all of the following:

Commented [A109]: Text clarifies that policy is not applicable to Tier 1 and 2 settlements in the plan (rather than establishing a dwelling size applicability threshold).

[48] HOU-009 – East Devon Gypsy and Traveller Accommodation Assessment, https://eastdevon.gov.uk/media/gl0n5qkq/2024-09-30-east-devon-gtaa.pdf

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A. Be physically well related to the built form of the host settlement. Whilst this does not need to be a settlement with a settlement boundary it must be one that offers a reasonable range of services and facilities;

B. Provide affordable housing meeting a proven, unmet need of the local community, noting that such need may be addressed through local plan allocations. Need ~~this~~ can be evidenced by a Housing Needs Survey or other local data such as a Neighbourhood Plan, Parish Survey or Parish Plan. Need is to be based on that existing in the host Parish where the proposal falls but can include need arising from any immediately abutting parish, excluding those ~~that~~ falling in Tiers 1 or 2 of local plan policy; and

C. Be provided for occupiers that have a local connection with the parish or host settlement or where appropriate adjoining Parishes. If occupiers meeting the relevant local connection criteria cannot be found then a cascade approach will be agreed, including accommodating need identified by registered providers, East Devon District Council, Community Land Trusts.

For any development allowed under this policy the dwellings must be retained in perpetuity ~~and~~ as affordable and there will need to be evidence to demonstrate that secure arrangements will be in place ensuring the housing will remain ~~affordable and~~ available to meet the continuing affordable housing needs of local people.

A small element of market housing may be included on any development, to provide sufficient cross-subsidy to enable the delivery of affordable homes without grant funding. However, at least 66% of dwellings ~~proposed~~ must be affordable dwellings. Where grant funding is available the market housing percentage should be adjusted downward.

This policy applies in the Cranbrook Plan area.

Justification for policy

~~8.46.~~8.48. Exception sites deliver affordable housing outside development plans, addressing local needs. This policy is crucial in rural areas with affordability issues, supporting the Council Plan's aim to increase affordable housing and aligning with the East Devon Housing Strategy.

~~8.47.~~8.49. National policy allows a small amount of market housing as a cross-subsidy to enable affordable housing delivery without grant funding. At least

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66% of dwellings on exception sites must be affordable, with adjustments if grant funding is available.

~~8.48.~~8.50. The East Devon Local Housing Needs Assessment 2022[49] provides evidence of the need for affordable housing. Exception sites help meet this need by delivering housing as an exception to other development plan policies.

Housing for rural workers

~~8.49.~~8.51. This policy supports housing for rural workers outside settlement boundaries, ensuring it meets the needs of rural businesses while minimi~~s~~zing environmental impacts.

Policy HN11: Housing for rural workers

Applications for rural workers dwellings outside settlement boundaries will be permitted where they support agricultural, horticultural, forestry or other businesses involved in land based growing or production of goods and all of the following are met:

A. It can be demonstrated that the nature and demands of an existing rural business are such that a full-time worker has an essential need to be permanently resident at or near their place of work so they are available at most times;

B. The need cannot be met within a nearby settlement, or by existing housing at or near the site or through the conversion of a suitable redundant or disused rural building at the site;

C. The size and scale of rural workers dwellings will be commensurate with the needs ~~of~~ generated by the holding and its activities and no bigger than 150 sq m (gross internal area) and designed to reflect the location and setting of the proposed site;

D. The development will minimise the visual and environmental impact by locating the dwelling close to existing buildings /dwellings, where practical for its purpose; and

E. The rural enterprise has been established for at least three years, is currently financially sound based on functional and economic tests, and the business has clear prospects of remaining viable.

Commented [A110]: Text clarifies dwellings must accommodate rural workers only.

[49] HOU-002 – Local Housing Needs Assessment - https://eastdevon.gov.uk/media/3724890/east-devon-lhna-final-accessible-160922.pdf

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~~The Council will take into a~~Account will be taken of the history of the holding, the recent pattern of land use and building and~~,~~ recent disposals of land and property when determining a planning application for housing for rural workers.

Where an agricultural, horticultural, forestry or other rural business is not yet established or the need is unproven, then a temporary dwelling such as a mobile home or caravan, may be permitted for a time limited period of up to three years, until the economic viability of the enterprise is established, subject to:

A. Meeting the criteria of ~~1b~~1a) to 1e) above;

B. A firm intention and ability to develop the enterprise; and

C. The business has realistic prospects of meeting functional and economic tests.

Permission for a rural worker dwelling will be subject to an occupancy condition to ensure that it cannot be sold on or sublet for general accommodation unrelated to the enterprise. Removal of such a condition will only be permitted where there is clear evidence that there is no need for the condition to remain in place.

Any permission granted will be tied through legal agreement to the business holding.

Extensions to or replacement of agricultural or forestry or rural business-related dwellings will require a reassessment of need, excluding minor works. Temporary or seasonal accommodation requirements to serve rural enterprises will be considered on a case-by-case basis.

This policy applies to all of the Cranbrook Plan A~~a~~rea for those parts that fall outside of Cranbrook Plan Built-up Area Boundaries.

Justification for policy

~~8.50.~~8.52. Housing need includes new dwellings for rural workers employed in agriculture, forestry, or similar rural enterprises. This policy supports rural businesses while limiting sporadic development in the countryside. Exceptions are justified where a rural worker must be available at most times for the operation of a rural business.

~~8.51.~~8.53. The policy sets a maximum dwelling size of 150 sq.m, informed by planning precedent in East Devon. This includes internal living space and additional requirements like a boot room or office. Only in exceptional cases will larger dwellings be considered, with evidence required to justify the additional space.

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~~8.52.~~8.54. Applicants must provide robust evidence of functional and economic tests, including a business plan and financial assessment. Temporary dwellings may be permitted for up to three years to establish the viability of a new enterprise. Extensions or replacements of rural business-related dwellings will require a reassessment of need.

~~8.53.~~8.55. The policy ensures that rural workers' dwellings are tied to the business holding through legal agreements and occupancy conditions. This prevents the dwellings from being sold or sublet for general accommodation unrelated to the enterprise.

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Supporting the Economy and Town Centres



Chapter 9. Supporting the Economy and Town Centres

9.1. Earlier in the plan, we outlined the Economic Vision, Strategy, and Strategic Policy on employment land, addressing strategic priorities, cross-boundary issues, and future employment development. This chapter includes the Strategic Policy on the town centre hierarchy and retail provision.



~~FIGURE 10~~FIGURE 9 A crowded and vibrant Sidmouth town centre.

9.2. Strategic policies are supported by non-strategic policies for development management and employment-related proposals. For this chapter, 'employment use' includes Use Classes B2, B8, E, C1, F1, F2, and Sui Generis.

Employment development within settlement boundaries

9.3. The local plan promotes larger scale employment development in the West End, while most new development elsewhere will occur within settlement boundaries, focusing on main population centres. This plan includes policies that support employment growth within these boundaries.

Policy SE01: Employment development within settlement boundaries

Within defined settlement boundaries, as shown on the Policies Map, and in the Cranbrook Plan Built-up Area Boundaries, development for employment uses,

Commented [A111]: Text amendment clarifies applicability inside Cranbrook Plan Built-up Area Boundaries.

including the intensification of existing employment sites, will be permitted where proposals are compatible with neighbouring developments and land uses and will not give rise to adverse amenity impacts or undermine plan strategy or specific policies directly relevant to the use of the land in question.

On existing employment and business parks, and on land allocated for employment use, uses other the E(g), B2 and B8 (offices, research and development, industrial processes and storage and distribution) will not be permitted unless they can be shown to be subordinate to, directly compatible with and complementary to the overall business use and will enhance job provision and the effective operation and business appeal of the park or site.

This policy applies to all of the Cranbrook Plan area, specifically for all areas that fall inseide Cranbrookk Plan Built-up Area Boundaries.

Justification for policy

9.4. The policy is essential to ensure a vibrant and resilient economy in East Devon. It aims to meet the future employment needs of the district by providing a range of employment sites, encouraging inward investment, and supporting local job creation.

9.5. The policy addresses the need for employment land within settlement boundaries, supporting self-containment and reflects the settlement hierarchy. It highlights the

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importance of traditional industrial estates and business parks while also promoting high-value employment opportunities.



~~FIGURE 11~~FIGURE 10 Light industrial units

9.6. New employment sites should meet a specific need as identified in the EDNA[50] or through identified business interest and contribute to sustainable growth. The policy directs office development to town centres and warehousing to suitable locations, ensuring good access to transport networks. It supports the reuse of previously developed land and allows for some flexibility in changes of use within employment sites, while maintaining a mix of employment opportunities.

9.7. The mix of uses within existing employment sites should primarily focus on Use Classes E(g), B2, and B8, with limited other employment uses as appropriate. This ensures a sufficient supply of land and premises to meet evolving business needs.

[50] ECN-001 – Greater Exeter Economic Development Needs Assessment (EDNA), https://eastdevon.gov.uk/media/flflexie/greater-exeter-edna-final-report-combined-v2-0.pdf

Employment development in the countryside

9.8. The policy supports the intensification and extension of existing employment businesses in the countryside, focusing on reusing or adapting existing buildings to minimi~~z~~se new development.

Policy SE02: Employment development in the countryside

Intensification and extension of existing employment businesses in the countryside

Building on land within the existing operational site boundaries of a business for intensification or extension of that business and its works and outputs, will be allowed in the countryside where the business:

A. Is operating in premises that are at or close to full occupancy; or

B. ~~The business~~ has a proven need arising from new or expanding operational functions.

This policy does not apply at farms or on businesses that operate from or within farm complexes and to ~~To~~ be acceptable under plan policy the:

Commented [A112]: Policy amended to accord with committee consideration on 11 Dec 2024.

A. Expansion will need to be proportionate to the existing size and scale of site operations; and

B. ~~The~~ proposal will need to prioritise reuse or adaptation of existing buildings to reduce the need for additional built development.

Noting these two considerations, extending existing buildings or provision of new buildings will only be acceptable if evidence demonstrates that re-use or adaptation of current buildings is not viable or practical.

Re-use of existing rural buildings

Proposals for small scale employment development through re-use and adaptation of existing redundant rural buildings not currently used or last used for employment, will be permitted where the buildings are:

A. Not in agricultural use or likely to be required for agricultural purposes;

~~B. Readily accessible via a range of modes of transport;~~

~~C.~~B. Of sound and permanent construction;

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C. Capable of adaptation or re-use without major re-building, alteration, or extension; and ~~Compatible with overall plan strategy and other local plan policy considerations.~~

Any development permitted in accordance with this policy should be readily accessible via a range of modes of transport, be socially and environmentally acceptable and be compatible with overall plan strategy and other local plan policy considerations.

~~D.~~ This policy applies to all of the Cranbrook Plan area that falls outside of the Cranbrook Plan Built-up Areea Boundaries.

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Justification for policy

9.9. This policy supports employment growth on existing rural sites while protecting the countryside's character. It balances economic development with environmental sensitivity, ensuring ~~expansions~~ new uses are appropriate in a countryside location, are proportionate and prioritis~~z~~e the reuse of existing structures.

Policy SE03: Farm diversification

Farm diversification will be supported through allowing for the introduction of new employment uses onto established farm holdings (those that have operated for at least 10 years) where the development requires a rural location, is subordinate to and supports the long-term financial viability of the farm. Criteria on what should be considered in the viability statement will be published and available online via the Council's website.

Proposals for farm diversification will need to meet all of the following:

A. The proposal is compatible with, and be an ancillary and subordinate component of, an existing and active farm enterprise and contributes to the continuing viability of the farm as a whole, retaining existing or providing new employment opportunities and services for the local community;

B. Development, in terms of its scale, nature, location and layout, does not detract from or prejudice the existing agricultural undertaking or its future operation;

C. Any existing suitable buildings are re-used or adapted and, where appropriate, redundant buildings which are derelict or offer no opportunity for beneficial use are removed; and

Commented [A114]: As per Matt's concern, amended to ensure that development is appropriate in a rural area and to ensure that other uses are directed to more appropriate employment sites

Commented [A115]: Amended to ensure that development is appropriate in a rural area and to ensure that other uses are directed to more appropriate employment sites

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D. Any new building (and parking and other structures/storage) is modest in scale and sited in or adjacent to an existing group of buildings.

~~D.~~ This policy applies in the Cranbrook Plan area.

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Justification for policy

9.10. This policy is crucial for supporting rural communities by allowing employment growth on existing sites while protecting the countryside's character. It aims to balance economic development with environmental sensitivity, ensuring that expansions are proportionate and prioritis~~z~~e the reuse of existing structures.

9.11. This policy will be used to guide decisions on rural diversifications, ensuring they are appropriate in scale and do not harm local amenities. The policy also supports the reuse of redundant rural buildings for small-scale employment, provided they are structurally sound and accessible.

9.12. The policy excludes business parks and industrial estates in rural areas, focusing instead on individual businesses. It emphasis~~z~~es the importance of maintaining the rural character and minimis~~z~~ing environmental impacts.

9.13. Agriculture underpins the District's rural economy and supports many ancillary businesses. It remains a significant sector for East Devon, providing direct jobs and underpinning other economic activities. The Council recogni~~sz~~es the importance of agriculture and the need for new employment in rural areas, making diversification crucial for the economic viability of farm holdings.

9.14. Diversification involves adding non-agricultural business activities within the holding to develop new income sources. This supports farm income, adds stability, and optimi~~sz~~es assets. Farmers are increasingly adopting entrepreneurial strategies to face economic pressures and policy changes, moving towards grants and tackling climate change.

9.15. The policy focuses on development appropriate to the existing business and rural character. It prioriti~~sz~~es using available buildings on a holding, with new buildings integrated with the existing environment. Diversification proposals should contribute to the farm business and rural economy, avoiding conflicts with existing operations.

9.16. Proposals should align with the future business plan for the holding, ensuring continued viability. Applications should be supported by information by a business plan and long-term viability statement produced in accordance with guidance on the Council's

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website. New uses must be appropriate, considering their impact on the surrounding area and relationship to agricultural operations. Diversification can include adding value to farm products, tourism, renewable energy, and other innovative activities.

9.17. Exceptionally, residential conversion may be part of a farm diversification project, considering the flexibility already provided by Permitted Development Use Class Q.

Resisting the loss of Employment sites

9.18. This policy aims to resist the loss of employment sites to other uses, ensuring that land designated or used for employment remains available to support economic growth and local job opportunities.

Strategic Policy SE04: Resisting the loss of employment sites

Loss of employment sites, either in whole or in part, to other uses will not usually be permitted. Employment sites are considered to be those currently in employment use or~~,~~ last used for employment and those which are allocated, permitted or conditioned for employment development.

Exceptionally, those sites in B2 and B8 uses will only be permitted for other types of employment use, if it can be demonstrated that:

A. The alternative use is in accordance with or does not undermine the plan's overall Spatial Strategy; and

B. Development relates to ancillary services of an appropriate size which will support an employment area (not within a town centre) by making it more sustainable and viable; or

C. Development results in mixed use regeneration within a settlement boundary designed to maintain or increase net job opportunities through alternative employment uses; or

D. The site is no longer viable for the current type of employment use but is viable for an alternative type of employment use, evidenced by a compliant viability statement; or

E. There is a lack of demand for the current type of employment use at the site, evidenced by a compliant marketing statement showing that the site has been appropriately marketed; and that a suitable supply of available (actively marketed)

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comparable employment sites/land can be demonstrated within the local area, evidenced by a compliant supply statement.

Exceptionally, the use of any employment sites for non-employment uses will be permitted if it can be demonstrated that:

A. The alternative use is in accordance with or does not undermine the plan's overall Spatial Strategy; and

B. The site is no longer viable for any employment use, evidenced by a compliant viability statement.

Compliant viability, marketing and supply statements must adhere to the respective requirements set out in the relevant guidance published and available online via the Council's website.

If an alternative use is acceptable, then applicants will be required to demonstrate that they have endeavoured to incorporate an appropriate (in terms of scale and type) element of employment floor space as part of the new development.

This policy applies in the Cranbrook Plan area.

Justification for policy

9.19. This policy is essential to maintain a sufficient supply of employment land in East Devon, supporting economic growth and local job opportunities. It aims to protect existing and proposed employment sites from being converted to other uses, ensuring they remain available, suitable, and achievable over the plan period.

9.20. This policy will be used to guide decisions on the retention of employment sites, ensuring that any proposed changes align with the overall Spatial Strategy and do not undermine the plan's objectives. The policy allows for exceptions where alternative employment uses or mixed-use regeneration can be justified, provided they support the sustainability and viability of employment areas.

9.21. The policy emphasi~~z~~ses the importance of retaining employment land within settlements to support local communities and reduce the need to travel. It also recogni~~z~~ses that some ancillary uses may complement and support employment areas.

9.22. As the economy evolves, not all employment areas will remain viable for their current uses. The policy allows for alternative uses if there is no realistic prospect of continued employment use, supported by robust evidence of viability and market demand. If an

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alternative use is appropriate, incorporating an element of employment provision should be considered.

9.23. This policy aligns with the NPPF, supporting sustainable and inclusive economic growth, and providing flexibility to respond to changing economic circumstances.

Employment and skills statements

9.24. This policy requires major developments to complete an Employment and Skills ~~table~~ plan and provide an Employment and Skills Statement for developments over 100 homes or 5,000 square metres of employment land. These documents aim to maximis~~z~~e local employment and skills opportunities.

Policy SE05: Employment and S~~s~~kills Statements

All major developments will be required to submit a basic Employment and Skills plan. Any developments over 100 homes or on employment sites of 5,000 square metres or greater will also need to provide an Employment and Skills Statement which commits to maximising the provision of skills and employment opportunities, to benefit the local population as well as the employer. These documents should be submitted with the planning application for development and will be implemented through a planning obligation or condition.

Compliant Employment and Skills Statements must adhere to the respective requirements set out in the relevant guidance published and available online via the Council's website.

This policy applies in the Cranbrook Plan area.

Justification for policy

9.25. This policy is crucial for ~~leveraging~~ seeking commitments from development projects to enhance employment and skills within East Devon. It ensures that major developments contribute to local job creation and skills improvement, benefiting both the local population and employers.

9.26. This policy will be used to ensure that Employment and Skills Plans and~~-~~ Statements are submitted with planning applications where required. These statements should outline commitments to local employment and skills provision and will be implemented

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through planning obligations or conditions. Guidance on these plans and statements will be made available on the Council's website.

9.27. The policy supports inclusive economic growth by raising skill levels in the district, aligning with broader initiatives like the Levelling Up White Paper[51]. It emphasisszes the importance of STEM (Science, Technology, Engineering and Mathematics) education, technical qualifications, and employer investment in workforce development.

9.28. Larger developments must commit to Employment and Skills Statements covering all development phases, secured through planning conditions or legal agreements. The Council will work with applicants to ensure these commitments are relevant, measurable, and monitored effectively.

9.29. The policy uses benchmarks from the National Skills Academy's Client Based Approach[52] to guide negotiations with developers, ensuring that employment and skills commitments are proportionate and achievable.

Town centre hierarchy, sequential approach and impact assessment

9.30. This policy establishes the relevance of the hierarchy of town centres in East Devon, prioritising tier one and two centres for main town centre uses. Proposals must align with the scale, design, and function of the centre and comply with other plan policies.

Strategic Policy SE06: Town centre hierarchy

Tier one and two town's form focal points of activity in East Devon towns and will be the preferred location for the development of new retail, leisure and other uses that attract and are used by people for commercial or community activities.

In these town centres new development proposals should be appropriate in terms of their scale and design to the centre in which they are proposed, as well as to the role and function of that centre.

[51] ECN-008 – Levelling Up the United Kingdom, https://eastdevon.gov.uk/media/hjjm23xj/ecn-008-levelling_up_the_united_kingdom__accessible_version_.pdf

[52] ECN-009 – Client-Based Approach, https://eastdevon.gov.uk/media/wggd3bpm/ecn-009-english-client-based-approach-contractor-guidance.pdf

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In tier three and four settlements (without a defined Town Centre Area) new smaller scale retail and commercial developments should be located within central parts of the settlement and readily accessible to pedestrians.

Outside of town centre areas development proposals for retail uses, or other leisure, commercial or communal uses, that attract substantial visitor or user numbers will not be permitted unless they are on land specifically allocated for that use in this plan or are explicitly provided for under other plan policy.

This policy applies in the Cranbrook Plan area.

Justification for policy

9.31. East Devon's town and village centres are community hubs offering retail, leisure, entertainment, sport, recreation, offices, cultural spaces, and tourism. Their vitality supports local communities, and the NPPF promotes competitive town centre environments and growth management. This strategic policy defines the network and hierarchy of centres, ensuring resilience to future economic changes, based on the Council's Role and Functions of Settlements Study[53].

9.32. The hierarchy includes:

- Tier one: Exmouth
- Tier two: Axminster, Cranbrook, Honiton, Ottery St Mary, Seaton, Sidmouth
- Tier three: Broadclyst, Budleigh Salterton, Colyton, Lympstone, Woodbury
- Tier four: Clyst St Mary, Uplyme, Beer, West Hill, Newton Poppleford, Feniton, Whimple, Kilmington, Otterton, East Budleigh, Stoke Canon, Tipton St John, Musbury, Sidbury, Chardstock, Broadhembury, Payhembury, Branscombe, Plymtree, Dunkeswell, Hawkchurch, Exton, Westclyst

9.33. Encouraging new shops and retaining existing ones, especially in rural areas, is crucial. This reduces travel, congestion, emissions, and improves health. The sequential test[54]

[53] GEV-001 – The Role and Functions of Settlements, https://eastdevon.gov.uk/media/q3ndtwjn/gev-001-role-and-function-of-settlements_report_v3-final-draft-for-spc.pdf

[54] ECN-007 – Evaluation of Town Centres and Retail Policy Boundaries Sequential Test, https://eastdevon.gov.uk/media/yxdkdfpo/3a-retail-town-centres-and-sequential-test-topic-paper-appendix-1.pdf

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ensures development is appropriately located, prioritising town centres, then edge-of-centre, and finally out-of-centre sites, provided they are accessible and do not harm nearby centres.

Town centre development

9.34. This policy supports the development of town centres in East Devon, enhancing their role as sustainable shopping and leisure destinations. It aims to improve the quality and range of facilities while maintaining the character and amenity of the centres.

Policy SE07: Town centre development, sequential approach and impact assessment

Town Centre Areas and Primary Shopping Areas are defined for the tier one and two towns (other than Cranbrook) and the settlements of Budleigh Salterton, Beer and Colyton.

Proposals for development within the Ttown Ccentre Aareas (and excepting Cranbrook which is subject to the policies of the Cranbrook Plan), as defined on the Policies Map, will be permitted where they 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. 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, incorporate provision for cycle access and cycle parking and enhance the natural environment wherever possible.

The Primary Shopping Areas as defined on the Policies Map 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 ground floor units are facilitating retail or leisure uses. Unless it can be demonstrated that there is no longer a retail or leisure demand, other town centre uses will not be permitted on the ground floor within the Primary Shopping Areas. Unless it can be demonstrated that there is no demand for any town centre use residential uses will not be permitted on the ground floor within the Primary Shopping

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Areas. Evidence of demand should be outlined in a marketing statement. Criteria on what will be considered an adequate marketing statement is available online via the Council's website.

Where the 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 Areas 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.

Sequential approach and impact assessment

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Outside of town centre areas development proposals for retail uses, or other leisure, commercial or communal uses, that attract substantial visitor or user numbers will not be permitted unless they are on land specifically allocated for that use in this plan or are explicitly provided for under other plan policy - unless:

A. Through sequential testing it can be demonstrated that a site within a Town Centre Area, or failing that on the edge or physically well related to a Town Centre Area, or failing that on an Edge-of-centre[55] site as defined in the NPPF is not available; and

B. For retail proposals with a floorspace of 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 either alone or cumulatively. Neighbourhood Plans may set different thresholds where local considerations, supported by evidence, indicate this is appropriate.

Retail development will not be permitted on sites allocated for other uses if equally suitable alternative provision can be accommodated in the immediate locality.

[55] 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.

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Any out-of-centre sites, which satisfy the sequential test, must be accessible by public transport, bicycle and foot and well-connected to the centre by these modes. 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.

This policy applies to all of the Cranbrook Plan Area, but matters in policy that reference 'Town Centre Areas' and 'Primary Shopping Areas' including through cross references to their depiction on the Policies Map do not apply.

Justification for policy

9.35. East Devon's town centres are compact, focusing on convenience and service provision, with many independent shops and supermarkets. Regular markets and events add vibrancy. Smaller settlements like Budleigh Salterton, Beer, and Colyton also have a range of shops and uses, making this policy applicable to them.

9.36. The policy defines Town Centre Areas and Primary Shopping Areas for tier one and two towns, and Budleigh Salterton, Beer, and Colyton. Development proposals in these areas should enhance retail and leisure facilities, strengthen vitality and viability, and not undermine the shopping character or visual amenity. Proposals should contribute positively to the townscape, include cycle access and parking, and enhance the natural environment.

9.37. Primary Shopping Areas will focus on retail and appropriate leisure uses. Other town centre uses will be permitted only if the majority of ground floor units remain retail or leisure. Residential uses on the ground floor are not permitted unless there is no demand for any town centre use, evidenced by a marketing statement.

9.38. Architecturally or historically significant shopfronts should be retained in new developments. Upper floors in Town Centre Areas are encouraged for residential or community use, provided they are independently accessed and do not impact retail use.

9.39. The policy aligns with the NPPF, supporting town centres as community hubs and defining acceptable uses. It ensures retail concentration in Primary Shopping Areas to maintain High Street vitality. Town Centre Areas and Primary Shopping Areas share the same boundaries on the Policies Map.

9.40. Historic town centres contain listed buildings and conservation areas, requiring sensitive design to protect and enhance their character. This creates attractive centres that encourage regular use and retain local spending.

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9.41. Town centres offer a mix of uses and benefit from public transport. The Local Plan provides a strategy for their development ~~and monitors their health~~ and to support their vitality and viability. ~~Masterplans for Exmouth and Cranbrook aim to enhance their retail and leisure offer.~~

Commented [A116]: Detail that is not needed.

9.42. Town centre and edge-of-centre sites are suitable for specialist housing, including for older people, due to their proximity to transport and services.

9.43. The policy seeks to retain retail units in town centres despite competition from online retailing and changes in use allowed by the General Permitted Development Order (GPDO). It applies to proposals outside the permitted development regime to ensure town centres remain attractive destinations.

9.44. The NPPF requires local plans to set thresholds for retail impact assessments. East Devon has set a 500 square metre threshold for retail and 2,500 square metres for other developments. These assessments should be proportionate and agreed upon early in the planning process.

Local shops and services

9.45. This policy supports the development of new shops and services within tier 1-4 settlements, villages, and neighbourhood centres, ensuring they enhance the local retail or service role and are accessible by walking and cycling. It also aims to resist the loss of existing local shops and services unless they are no longer viable.

Policy SE08: Local shops and services

Provision of new shops or services

Outside of town centres and within village and neighbourhood centres proposals for shopping and service development (including Public Houses and Post Offices) will be supported within tier 1-4 settlements, provided it enhances their retail or service role and is accessible by walking and by bicycle and will not result in excessive traffic generation. New shops should sell predominantly convenience goods, be of a scale to serve the local area without, alone or cumulatively, impacting on the vitality or viability

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of any nearby centre[56].
As a guide, shops in these locations should not exceed 280sqm, mostly sell essential goods, including food and be at least 1km from another similar shop.

Loss of existing local shops or services

Existing retail and service provision within villages should be maintained and potential providers of future retail development within villages will be encouraged to make provision of a scale and nature appropriate to local needs.

Development proposals ~~the~~that would result in the loss of existing local shops and services will be resisted where it would result in the significant or absolute loss of that facility to the community unless ~~through a viability statement~~ it is evidenced that it is no longer viable for the shop or service to be sustained, including under community acquisition/operation or within, or as part of, a different use. Evidence will need to be presented to show that the site has been actively marketed for at least 12 months at a sound, realistic and viable price for commercial uses and that other employment and non-residential uses are not a viable alternerative. Evidence should be outlined in marketing and viability statements, guidance as to what should be considered in these is available online via the Council's website.

Permission to change the use of a shop will be subject to the retention of the shopfront.

The section of this policy that falls under the heading of 'Loss of existing local shops or services' applies to all of the Cranbrook Plan area. The section under 'Provision of new shops or services' does not apply in the Cranbrook Plan Area.

Commented [A117]: Text amended in accordance with agreement at Committee on 11 Dec 2024.

[56] As a guide to the scale and location of shops in the smaller settlements, Use Class F.2 (of the 1st September 2020 General Permitted Development Order) relates to shops not more than 280sqm mostly selling essential goods, including food and at least 1km from another similar shop.

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Justification for policy

9.46. Throughout East Devon, small groups of shops and services are vital for meeting the basic, everyday needs of communities. These range from comprehensive offers in town and village centres to neighbourhood and village shops. The diversity of provision makes it impractical to define all local centres on the Policies Map, but these areas typically supply a range of everyday goods and services. There is potential for improving local centres and providing new shops, post offices, and services in areas lacking retail facilities. Opening hours in residential areas may be restricted to safeguard local amenity.

9.47. Existing shops and services are crucial for day-to-day convenience shopping, especially for the elderly and less mobile. Village public houses and post offices reduce reliance on private cars, particularly where public transport is limited. The Council will resist the loss of local shops and services where it would significantly impact the community.

9.48. Reinstating shops after they have changed to other uses is challenging. Proposals involving the loss of local shops or services will only be permitted if the existing use is no longer viable and there is no market for the business. The Council will seek marketing and financial information to demonstrate this and will aim to retain the shopfront for potential future use. Detailed guidance on the scale and type of evidence that is required to accompany a planning application is available on the council's website.

9.49. Recognising the community role of shops and services is essential for creating sustainable places. This policy aligns with NPPF guidance on retaining and developing accessible local services and community facilities. It takes a cautious approach to the loss of important shops and services, ensuring community needs are met while allowing for change of use when viability can no longer be demonstrated. Proposals must provide evidence of non-viability through marketing information and viability studies.

Rural shops outside of towns and villages

9.50. This policy supports retail development in rural areas outside towns and villages, provided it directly relates to an existing rural business and meets specific criteria to protect town centres and local shops.

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Policy SE09: Rural shops outside of towns and villages

~~In order to support local rural businesses whilst protecting the viability of town centres and shops available to the local community, retail development in rural areas, outside villages, including extensions or additional facilities, will be permitted only where they directly relate to an existing rural business,~~ To support local rural businesses, while safeguarding the viability of town centres and local shops, retail development in rural areas outside villages (including extensions or additional facilities) will be permitted if it is directly connected to an existing rural business, such as a farm or plant nursery. This will be subject to:

A. A minimum of 60% of the produce/products for sale being produced on the premises or holding;

B. At least half of the remaining produce/products for sale being sourced and produced from within East Devon; and

C. The remainder of the produce/products for sale being sourced and produced from within Devon, Cornwall, Dorset and Somerset.

and provided that:

A. The scale and type of retail shop proposed will not adversely affect easily accessible convenience shopping available to the local community (and a retail impact assessment may be required to ensure that existing town centres and local shops are not adversely affected to an unacceptable degree);

B. The proposal does not harm the rural character of the surrounding natural or historic environment, or the amenities of the locality;

C. The local road network and access to the site can safely accommodate the extra traffic generated by the proposal; and

D. The car parking will be proportionate to the scale of the development and the layout and siting will be sympathetic to the surroundings.

This policy applies to all of those parts of the Cranbrook Plan area that fall outside of the Cranbrook Plan Built-up Area Boundary.

~~D.~~

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Justification for policy

9.51. Rural businesses are those that rely on the land and natural assets of the countryside to derive an income. They are not, for the purposes of this policy, businesses that are simply located in a rural area.

9.52. Rural shops, including farm shops and plant nurseries, are defined as those where the majority of goods sold are produced on the premises or associated land. This ensures a strong link to the land use, preventing them from becoming general retail outlets. Farm shops provide valuable local facilities and additional income for farms, supporting the rural economy without competing with town and village centres.

9.53. To prevent rural shops from becoming large commercial enterprises, the policy restricts the size and type of goods sold. Additional services, such as cafes, are only permitted if ancillary to the sale of goods produced on the property. This control ensures rural shops do not harm the high-quality East Devon landscape or generate excessive traffic.

9.54. The policy promotes retail development in rural areas where products are locally sourced or manufactured, supporting agricultural diversification and local food production. It restricts the scale of development and the origin of goods to protect the vitality and viability of town centres, ensuring they remain the focus for retail, services, leisure, and public amenities.

9.55. Proposals for new or expanded rural shops must not adversely affect local convenience shopping, the rural character, or local amenities. They must also ensure safe access and proportionate car parking. The policy aligns with the NPPF, promoting sustainable rural retail development while protecting town centres.

Sustainable tourism

9.56. This policy aims to secure a high-quality, sustainable tourism experience in East Devon, benefiting local communities and businesses while conserving the district's natural beauty, wildlife, and cultural heritage.

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Policy SE10: Sustainable tourism

The provision of visitor accommodation, facilities and attractions within settlement boundaries will be supported and encouraged where they are of an appropriate scale for the locality and minimise reliance on the private car.

Tourism development in the countryside

Any proposal for new tourist attractions, facilities or temporary accommodation in the open countryside should be to meet an identified and evidenced demand and meet the following criteria in full:

A. Re-use or adapt any existing suitable buildings and, where appropriate, remove any redundant buildings which are derelict or offer no opportunity for beneficial use. If existing buildings cannot be reused or adapted then this should be fully justified;

B. Where new buildings are justified, they must be of an appropriate scale, siting and appearance and activities must be of an appropriate intensity for the character of the area and not adversely impact local amenity to a significant degree;

C. Not result in significant adverse impacts from vehicle movements or parking and, where it is likely to create significant vehicular movements to and from the site, development should be well located in relation to sustainable tier 1-4 settlements and local public transport provision;

D. Be closely associated with other attractions/established tourism uses, including the public rights of way network; and

E. Be located very close to the main dwelling from which it will be serviced/managed (e.g. as part of a farm diversification scheme) to avoid the need for a permanent new managers dwelling or multiple daily car journeys to manage the site.

New buildings to provide overnight visitor accommodation in the open countryside will not be permitted. Temporary structures such as yurts, glamping pods, towing caravans and tents may be acceptable in appropriate locations but should be capable of being completely removed from the site when not required/out of season.

Loss of Existing Visitor Accommodation

The loss of any visitor accommodation to other uses will only be permitted in exceptional circumstances. For example, converting holiday accommodation into low-cost staff accommodation (rented residential accommodation for local workforce), which will address recruitment challenges for the tourism sector.

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Proposals for new Tourist Attractions/Facilities or Accommodation

Proposals for new permanent and temporary visitor accommodation and attractions will need to demonstrate a commitment to:

A. Developing facilities of high quality;

B. Working towards Net Zero;

C. Improving accessibility provision (accessible in terms of providing suitable access to those with physical and non-physical impairments/disability); and

D. Positively contribute to the natural beauty, wildlife and cultural heritage of the District.

In order to provide such evidence, applicants will be required to submit a Sustainable Tourism Statement outlining their commitment to the above criteria.

In this Policy "visitor accommodation" means serviced tourist accommodation (Class C1 use) and un-serviced tourist accommodation, as well as essential ancillary staff buildings to support the provision of tourism services.

This policy applies in the Cranbrook Plan area.



~~FIGURE 12~~FIGURE 11 Beer Village Centre

Justification for policy

9.57. Tourism is vital to East Devon's economy, attracting visitors with its unique environment and offering diverse accommodation options. The policy supports sustainable tourism growth, ensuring proposals benefit local communities and businesses while conserving the natural environment.

9.58. Visitor accommodation ranges from hotels and B&Bs to holiday lets, glamping, and caravan sites. The Council supports sustainable attractions and activities that avoid negative impacts like increased traffic and environmental degradation. Proposals should retain and utilise existing buildings where possible, with new buildings requiring justification and sensitivity to the site.

9.59. The Council will resist the loss of permanent visitor accommodation unless it is financially unviable, requiring evidence through marketing requirements. Redevelopment should prioritise more suitable tourist or community uses, especially in areas like the Coastal Preservation Area.

9.60. The policy promotes 'green tourism,' encouraging proposals that enhance visitors' understanding and enjoyment of East Devon's natural environment. It aims to balance accommodation provision with protecting the rural character, favouring conversions of existing buildings and temporary structures over new permanent buildings.

9.61. Tourism development should be located sustainably within tier 1-4 settlements to minimise car use. Some activities may require rural locations, which should be planned to positively contribute to the natural environment. Sustainable travel options, like bicycle hire, should be included to align with the Council's net-zero targets.

Holiday accommodation parks in designated landscapes

9.62. This policy restricts new holiday accommodation parks in East Devon's most sensitive landscapes, allowing only extensions or ancillary facilities on existing sites under specific conditions to protect the environment and local communities.

Policy SE11: Holiday accommodation parks in designated landscapes

Within the District's most sensitive landscape areas, including National Landscapes , Coastal Preservation Areas and Green Wedges, new caravan, chalet or other holiday parks will not be permitted.

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Proposals for the extension of, or related and ancillary facilities on, existing sites will be permitted provided they meet the following criteria in full:

A. No additional permanent pitches or accommodation are to be provided, although upgraded accommodation of a similar size and height will be allowed on the footprint of existing permanent accommodation where this will result in an environmental improvement;

B. The proposal relates sensitively in scale and siting to the surroundings and includes extensive landscaping and visual screening to mitigate against adverse impacts;

C. The proposal would not have an adverse impact on local character or the amenities of adjoining residents;

D. The proposal would not use the best and most versatile agricultural land;

E. The proposal will be provided with adequate services and utilities;

F. Traffic generated by the proposal can be accommodated safely on the local highway network and safe highway access to the site can be achieved;

G. The proposal will be subject to the provisions of plan policy in terms of sustainable construction, on site renewable energy production and biodiversity net gain; and

H. Any structures beyond the existing boundary of the site are temporary and any visual or other harm can be satisfactorily mitigated.

~~H.~~ This policy does not apply in the Cranbrook Plan area.

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Justification for policy

9.63. The majority of East Devon lies within designated landscapes. Holiday accommodation parks, including static caravans, chalets, and lodges, are key to the tourism sector and can positively impact the local economy. However, their development must not harm the natural environment or local communities. This policy ensures applications for such developments are carefully managed, particularly given the large scale, range of facilities, lengthy operational hours, and prominent coastal locations of many existing parks.

9.64. Outside designated landscapes, new or expanded holiday parks are acceptable in principle under the Sustainable Tourism policy. Within designated landscapes, no new holiday parks will be permitted. Existing parks are encouraged to upgrade and improve their facilities to reduce visual, environmental, and amenity impacts. Extensions and intensification of existing sites are only allowed for non-permanent ancillary facilities, provided adverse impacts are mitigated.

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9.65. This policy balances the economic benefits of holiday accommodation parks with the need to protect East Devon's sensitive landscapes. It ensures that any development is appropriately scaled, sensitively sited, and includes extensive landscaping and visual screening. Proposals must not adversely affect local character, amenities, or agricultural land and must provide adequate services and safe access.

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High Quality Design



Chapter 10. High Quality Design

10.1. The design of spaces and buildings significantly impacts how we experience places and the natural environment. Good design influences health, safety, inclusion, travel choices, cost of living, and quality of life. It also affects the environment through construction methods, local context integration, and addressing climate emergency demands.

10.2. The National Planning Policy Framework (NPPF) emphasises that creating high-quality places and buildings is essential in planning and development. Good design is a key aspect of sustainable development and helps make development acceptable to communities. Local Plan policy ensures well-designed proposals align with the NPPF and national design guidance.

~~**10.3.**~~ The Local Plan includes site allocations to meet national housing targets. The design of development at these allocations is crucial to preserving valuable landscapes, especially in sensitive sites like National Landscapes or heritage assets. Design codes will guide future proposals, ensuring new development is resilient and well-integrated into the environment.

~~**10.4.** Good design extends beyond aesthetics to include sustainability and energy efficiency. Every development is an opportunity for good design, with this chapter including policies addressing:~~

- ~~Climate change resilience~~
- ~~Healthy and active lifestyles~~
- ~~Green infrastructure~~

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10.3.

FIGURE 13 Considered green infrastructure is vital to create healthy places.

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~~10.5.~~10.4. New development should provide a high standard of amenity for users. The quality of a home impacts health outcomes, and suitable size and layout are key. The Government's nationally described space standard (NDSS)[57] sets minimum standards for new dwellings. Local planning authorities may adopt the NDSS through local plan policies, subject to evidence of need and viability.

~~10.6.~~10.5. Recent evidence shows only 29% of new dwellings in East Devon meet the NDSS for gross internal floor area, with even fewer meeting other NDSS requirements.[58] This may result in inadequate space for daily activities. The impact of adopting the NDSS will be assessed in the viability study accompanying the East Devon Local Plan 2020-40 to ensure the Plan's deliverability.

[57] HOU-007 - Technical Housing Standards - Nationally Described Space Standards, *Link to EDDC when available*

[58] HOU-008 – Nationally Described Space Standards Evidence, https://eastdevon.gov.uk/media/3724804/lp-2020_40_ndss-evidence1.pdf

Design and local distinctiveness

~~10.7.~~10.6. This policy ensures new development and refurbishment of existing buildings are of high-quality design and locally distinctive, aligning with local and national design guidance.

~~Strategic~~ Policy DS01: Design and local distinctiveness

New development, including the refurbishment of existing buildings should be of a high quality design and locally distinctive. Proposals should clearly respond to local policy and guidance including Neighbourhood Plans and Design Guides / Briefs / Codes, whether adopted as Supplementary Planning Documents or promoted through other means. For proposals in the Blackdown Hills National Landscape, reference should be made to the Blackdown Hills AONB Design Guide For Houses; within the East Devon National Landscape, reference should be made to East Devon AONB Planning Guidance. Proposals should also be in accordance with the principles of the National Design Code and Building for a Healthy Life, and any other local design guidance.

The layout and design of building curtilages, roads, parking, pavings, open space, site furniture footpaths and boundary treatments should make a positive contribution to the street scene / public realm and the integration of the development with its surroundings and setting. Recycling and waste storage facilities should be in locations well related to collection points. Particular care will need to be given to boundary treatments that abut public or communal areas in order to avoid adverse impacts.

Proposals will only be permitted where they:

A. Respect the key characteristics and special qualities of the area in which the development is proposed;

B. Ensure the appearance of buildings, including scale, massing, density, height, fenestration, and materials, relate well to their context;

C. Do not adversely affect:

1. The distinctive rural, historic or architectural character of the area;
2. The urban form, in terms of significant street patterns, groups of buildings and open spaces;
3. The amenity of occupiers of adjoining residential properties;
4. The operation of existing uses outside of the proposed development;

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5. The future amenity of occupants of proposed residential properties, with respect to access to open space; protection from noise and pollution; provision of adequate internal light; storage space for bins, bicycles, prams, and other uses; and

~~6.~~ D. Meet nationally and locally described space standards[59];~~.~~

~~7.~~ E. Have due regard for important aspects of detail and quality and should incorporate:

1. Attractive, secure layouts with safe and convenient access for the whole community, including disabled users, and incorporating appropriate measures to reduce the potential for crime and antisocial behaviour;
2. Structured layouts to avoid conflicts between different uses;
3. Well-defined, accessible, and overlooked routes for people and vehicles to ensure security;
4. Appropriate lighting to oversee public spaces and reduce crime opportunities;
5. The promotion of ownership and community responsibility by clearly defining public and private areas;
6. Appropriate activity levels to maintain safety and reduce fear of crime at all times;
7. ~~8.~~ Well-designed security features to support passive, safe design;

~~D.~~ Necessary and appropriate street lighting and furniture and, subject to negotiation with developers, public art integral to the design;

~~9.~~8.

~~10.~~9. Features that maintain good levels of daylight and sunlight into and between buildings to minimise the need for powered lighting where this does not conflict with shade and tree planting requirements;

~~11.~~10. Appropriate soft landscape (greening) measures and open space provision to enhance amenity and biodiversity value;~~.~~

~~12.~~11. Measures that minimise risks associated with climate change, including a fabric first approach, the use of appropriate materials, techniques, and technologies to reduce carbon emissions over the lifetime of the development;

[59] Technical housing standards – nationally described space standard - GOV.UK (www.gov.uk)

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~~13.~~12. The ~~Mitigate~~mitigation of potential adverse impacts, such as noise, smell, dust, arising from developments, both during and after construction;~~.~~

~~14.~~13. ~~Include~~ Mmeasures to secure the management of waste in accordance with the waste hierarchy (reduce, reuse, recycle, recovery, disposal) during the construction and operational phases;~~.~~

~~15.~~14. A comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.

On any development scheme there is potential for the creation of inert material during any demolition and construction or ground movement or remodelling. Principles of waste reduction and reuse should be considered in the layout, design and levels of any development on all the sites. In development proposals the potential for on-site reuse of inert material will be required to be addressed in development proposal, as this will reduce the generation of waste and subsequent need to export waste off-site for management.

This policy applies to all of the Cranbrook Plan A~~a~~rea but does not supersede any Cranbrook Plan policies.

Justification for policy

10.7. Paragraphs 131 to 141 of the NPPF ~~mandate~~ sets out that planning authorities to create policies for high-quality, beautiful, and sustainable places and buildings. Paragraph 132 highlights the need for clear design visions and expectations to provide applicants with certainty. The NPPF advises local planning authorities to prepare design guides or codes consistent with the National Design Guide[60] and National Model Design Code[61], reflecting local character and preferences.

10.8. Policy W4 of the Devon Waste Plan 2011-2031 requires the submission of a waste audit statement for all major planning applications to minimise the generation of waste.

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Commented [A123]: Text addition provides a useful addition in respect of waste matters and to waste planning.

[60] HRD-003 – National Design Guide, https://eastdevon.gov.uk/media/45hnoxhb/hrd-003-national-design-guide.pdf

[61] HRD-001 – National Design Code Part 1, https://eastdevon.gov.uk/media/giyl0kst/hrd-001-national-model-design-code-pt1-the-coding-process.pdf

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~~10.8.~~

10.9. This Council will prepare a District Design Guide to help inform the application of Policy DS01.

Housing density and efficient use of land

10.10. This policy ensures residential development optimises site density while conserving or enhancing the area's character and making efficient use of land. Major developments and those in sensitive locations require a design code specifying density recommendations.

Policy DS02: Housing density and efficient use of land

Proposals for residential development should optimise the density of the site in a manner that conserves or enhances the character of the area and makes efficient use of land.

Proposals for major development schemes and those in environmentally or heritage sensitive locations will be required to be supported by a design code agreed with or produced by the council as planning authority. Codes, amongst other matters, ~~will~~ may specify density recommendations for key allocations.

~~,~~This policy does not apply in the Cranbrook Plan area.

Justification for policy

10.11. Paragraphs 123 to 130 of the NPPF focus on making effective use of land and achieving appropriate densities. To meet sustainability goals, it is essential to use land efficiently and build at the highest density compatible with the surrounding area's character. The NPPF (paragraph 129) advocates for minimum density standards in town centres and areas well-served by public transport to significantly increase average residential density. It also suggests setting a range of densities based on the accessibility of different areas.

Advertisements

10.12. This policy ensures that advertisements are appropriately positioned, safe, sympathetic to the area's character, and designed with compatible colours and materials. Illuminated advertisements should reflect the area's general lighting level~~., with a preference for~~

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~~illumination to be outside the advertisement (i.e. shining onto the advert / notice) rather than embedded / contained within them (i.e. shining outwards).~~

Policy DS03: Display of advertisements

Applications for the display of advertisements will be considered in terms of amenity and public safety, taking account of cumulative impacts. Advertisements should be:

A. Appropriately positioned and scaled in relation to their context;

B. Safe in terms of highway safety;

C. Sympathetic to the character of the area;

D. Designed with colours and materials compatible with the building and area; and

E. Where illuminated, the type and level of illumination should reflect the general level of lighting in the area.

~~F.~~ This policy applies in the Cranbrook Plan area.

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Justification for policy

10.13. The display of advertisements is controlled similarly to planning permission but under a separate legal system. This policy guides decision-makers on handling advertisement consent applications.

10.14. The NPPF states that poorly sited and designed advertisements can undermine an area's character. Control should focus on amenity and public safety, considering cumulative impacts (paragraph 141). This policy seeks to address these issues.

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Incorporating green and blue infrastructure in design and development

10.15. This policy ensures that development in East Devon delivers high-quality, multi-functional Green and Blue Infrastructure in line with Natural England's Green Infrastructure Framework[62].

Policy DS04: Green and blue Infrastructure

Development in East Devon will deliver high quality multi-functional Green and Blue Infrastructure in accordance with Natural England's Green Infrastructure Framework.

All major development proposals must:

A. Demonstrably meet the 5 Natural England Green Infrastructure Principles[63] ~~and follow the guidance set out in the Green Infrastructure Design Guide~~;

B. Provide a robust Green and Blue Infrastructure Plan which clearly demonstrates how it accords with Natural England's GI Framework and will contribute to nature recovery and restoration of wildlife rich habitats; is integrated with and connects to the surrounding landscape;~~,~~ and provides multi-functional Green Infrastructure which incorporates and enhances natural ecosystems functions including landscape and water quality, biodiversity, food production (including orchards and allotments), increased canopy cover, sustainable drainage and climate change mitigation/adaptation;

C. Enhance and promote the health and wellbeing of residents through the provision of high quality publicly accessible natural green/blue space and connected cycling/walking infrastructure;

D. Enhance existing habitats and provide new wildlife spaces and corridors that enhance biodiversity and provide green links, open space and biodiversity enhancement areas;

E. Maximise beneficial outcomes for residents and visitors to encourage use of the GI network and to enrich the cultural identity of the area;

[62] ENV-011~~5~~ - Natural England's Green Infrastructure Framework - https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx [accessed 8th Jan 2025]
[63] ENV-010~~3~~ - Natural England Green Infrastructure Principles (Detailed version, date January 2023) - https://eastdevon.gov.uk/media/4j0herl1/env-012-natural-england-green-infrastructure-principles.pdf

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F. Contribute to the achievement of excellent ecological status of rivers and watercourses, through enhanced natural flood storage, capture of run-off and restoration of soil health; and

G. Clearly demonstrate how proposed Green and Blue Infrastructure will be managed and maintained.

~~G.~~ This policy applies in the Cranbrook Plan area.

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Justification for policy

10.16. Good quality Green Infrastructure (GI) plays a crucial role in improving health, wellbeing, air quality, nature recovery, and climate resilience, while addressing social inequality and environmental decline. GI is a network of multi-functional green and blue spaces and natural features that provide a wide range of benefits for nature, climate, communities, and prosperity.

10.17. Development proposals in East Devon should align with the five Benefit Principles of Natural England's Green Infrastructure Principles[64] Wheel:

- Nature Rich Beautiful Places
- Active and Healthy Places
- Thriving and Prosperous Places
- Improved Water Management
- Resilient and Climate Positive Places

10.18. GI should be multifunctional, accessible, connected to its landscape and nature networks, and responsive to local character. It provides opportunities to link with Biodiversity Net Gain, Local Nature Recovery Strategies, Nature Recovery Network, and Natural Capital. GI provision can fully count towards Biodiversity Net Gain delivery. The council will look to produce a standalone Green Infrastructure Design Guide and/or to incorporate Green Infrastructure measures into other design guidance to also help inform implementation of policy.

Commented [A124]: Wording reflects potential (and desirability) for bespoke district wide (or more localised) GI guidance. This is not yet produced and referenced is deleted from policy itself.

[64] ENV-010 – Natural England Green Infrastructure Principles (Detailed Version, date January 2023), https://eastdevon.gov.uk/media/4j0herl1/env-012-natural-england-green-infrastructure-principles.pdf

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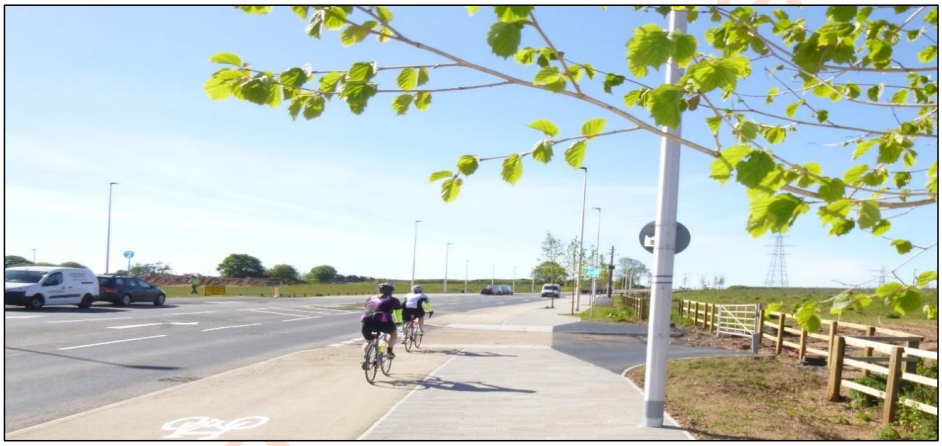
Sustainable Transport and Communications



Chapter 11. Sustainable Transport and Communications

Introduction

11.1. East Devon is a largely rural district with relatively low levels of walking, cycling, and public transport, and higher car ownership, compared to ~~than~~ the national average. While some villages and hamlets rely on car travel, larger settlements offer jobs, facilities, and services accessible by sustainable travel modes.



~~FIGURE 14~~FIGURE 12 New cycle and walkways facilitate sustainable travel.

11.2. The spatial strategy in chapter 3 reflects national policy by focussing significant development at locations which are, or can be made sustainable, through ~~focuses on sustainable development locations,~~ limiting the need to travel and offering ~~various~~ a genuine choice of transport modes. Promoting sustainable transport in new developments reduces traffic congestion, lowers carbon emissions, improves air quality, and enhances physical and mental health. It also ~~prevents~~ addresses social exclusion for those without car access, such as young people, older people, those with disabilities, and low-income households.

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~~11.2.~~**11.3.** A range of other plans prepared by partner organisations, principally Devon County Council as the local transport authority, promote sustainable travel – these include Local Cycling and Walking Infrastructure

Plans[65], Local Transport Plan 4[66], and the Bus Service Improvement Plan[67]. Transport modelling is underway to consider the impact of development across the wider covering East Devon, Exeter, Mid Devon and Teignbridge.

Commented [A126]: Provides context of other plans that promote sustainable travel; and to highlight the ongoing transport modelling.

Walking, cycling and public transport

~~11.3.~~11.4. This policy prioritises walking, wheeling, cycling, and public transport for short local journeys and as part of longer journeys. ~~It mandates the prioritisation of walking and cycling routes in new developments and facilitates access to high-quality public transport.~~

Commented [A127]: Sentence deleted as superfluous.

Strategic Policy TR01: Prioritising walking, wheeling, cycling, and public transport

Walking, wheeling, cycling and public transport should be the natural first choice for short local journeys, or as part of a longer journey. Walking and cycling routes must be prioritised in new development (specifically including where land is allocated for development) – such routes should be coherent, direct, safe, comfortable and attractive. Where appropriate, cycle paths should be segregated from pedestrians to reduce the potential for conflict (for example, where high usage levels are anticipated). Proposals for walking and cycling routes should be aligned with the Local Transport Plan and, where relevant, the Clyst Valley & New Communities and Countywide Local Cycling and Walking Infrastructure Plans.

New development (specifically including where land is allocated for development) should facilitate access to high quality public transport through its location, layout, and, where necessary, contributions to public transport services and/or facilities (for example, bus services, bus stops, bus priority measures, rail infrastructure). In

Commented [A128]: Change (and as below) emphasises particular importance at allocated sites and also highlight key Devon County transport plans.

[65] TRI-004 - Cycling and Multi-Use Trail Network Strategy, https://eastdevon.gov.uk/media/3ifdkvrm/tri-004-cycle-and-multi-use-strategy.pdf

[66] TRI-008 – Devon and Torbay Local Transport Plan 4, https://www.devon.gov.uk/roads-and-transport/traffic-information/transport-planning/devon-local-transport-plan-4-2025-2040/ [accessed 13th Jan 2025]

[67] TRI-009 – Bus Service Improvement Plan, https://eastdevon.gov.uk/media/dylhidnc/tri-009-bus-service-improvement-plan-2024-v-3-0-june-2024.pdf

particular, development should be aligned with Devon County Council's Bus Services Improvement Plan.

Where appropriate, development should provide, or otherwise make contributions to, an easy interchange between active and shared transport modes through the delivery of mobility hubs.

Development which would result in the loss or reduce the convenience or attractiveness of an existing or proposed footpath, cycleway or bridleway, will not be permitted unless an acceptable alternative route is provided.

This policy applies in the Cranbrook Plan area.

Justification for policy

~~11.4.~~11.5. Exmouth, Honiton, Seaton, and Ottery St Mary have bespoke bus services, with several high-frequency routes linking East Devon settlements to Exeter. The district has nine train stations across two lines, with significant usage increases over the past 20 years. High-quality active travel corridors, like the Exe Estuary Trail, are also present.

~~11.5.~~11.6. Studies suggest that ~~M~~most people prefer to walk if their destination is within 1.6 km (1 mile), typically 800m (0.5 miles).[68] Factors such as topography, surveillance, directness, and attractiveness also influence walking choices. While it is unrealistic to require all new developments in rural East Devon to be within 800m of ~~various uses~~ key services and facilities, this is feasible in larger settlements and developments.

~~11.6.~~11.7. The National Model Design Code advocates walking and cycling for short local journeys, especially those under five miles. In the South West, 43% of journeys are under two miles,[69] offering significant potential for walking

[68] HCO-002 - Planning for Walking, CIHT, 2015: ~~Planning for Walking_LARGE_DOC_V1.indd (ciht.org.uk)~~https://www.ciht.org.uk/media/4465/planning_for_walking_-_long_-_april_2015.pdf ; HRD-003 - National Design Guide, ~~2021: National_design_guide.pdf (publishing.service.gov.uk)~~ https://eastdevon.gov.uk/media/45hnoxhb/hrd-003-national-design-guide.pdf

[69] ~~See:~~ TRI-016 – Region and Rural-Urban Classification, https://www.gov.uk/government/statistical-data-sets/nts99-travel-by-region-and-area-type-of-residence#trip-length ~~Region and Rural-Urban Classification - GOV.UK (www.gov.uk)~~

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or cycling instead of driving. Wheeling includes people who use wheelchair and mobility scooter users who may not identify with walking.

~~11.7.~~11.8. Sustainable travel 'mobility hubs' can promote walking, cycling, and public transport by providing facilities like secure cycle storage, bike hire, electric vehicle charging, car sharing spaces, and bus stops in one location. These hubs are ideal for key locations such as train stations, bus stops, and Park and Ride sites.

~~11.8.~~11.9. East Devon, being predominantly rural, has a substantial public rights of way network that this policy seeks to protect and enhance.

Protecting transport sites and routes

~~11.9.~~11.10. This policy supports the delivery and protection of sites and routes critical for developing infrastructure to widen transport choice and facilitate large-scale development.

Strategic Policy TR02: Protecting transport sites and routes

The council will support the delivery of sites and routes that are critical in developing infrastructure to widen transport choice and realise opportunities for large scale development. New developments should also seek to aid the delivery of transport routes, particularly those proposed in Local Cycling and Walking Infrastructure Plans, Bus Service Improvement Plans, Local Transport Plans or other relevant strategies, taking into account the needs they generate and also potential that may arise though later developments in adjoining or nearby areas.

The following proposed transport sites and routes will be protected from other development that will preclude their delivery.

Strategic cycle network schemes:

A. Clyst Valley Trail

B. Sidford to Sidbury

C. Cranbrook to Exeter (E3)

~~Otter Trail~~

~~Beer to Axminster and Uplyme~~

Public transport:

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A. Railway passing loop(s) as necessary between Honiton and Cranbrook.

B. Bus priority route at A3052/A376 to M5 Junction 30.

Road schemes:

A. Alterations/improvements to Clyst St Mary roundabout (A3052/A376)

~~A.~~B. Alterations/improvements to A30 Airport Junction

C. The route of Axminster relief road.

~~B.~~ This policy applies in the Cranbrook Plan area.

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Justification for policy

~~11.10.~~11.11. The policy ~~aims to~~ identifies~~y~~ and safeguards sites and routes essential for enhancing transport infrastructure and promoting sustainable travel. ~~This includes park and ride sites, train stations, bus priority measures, and walking/cycling routes.~~ Protecting these sites and routes from other development that could hinder their implementation aligns with national policy and supports the development of a comprehensive transport network.

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~~11.11.~~11.12. New development~~s~~ should contribute to the delivery of these transport sites and routes, ~~considering the needs they generate and potential future developments in nearby areas~~where justified. ~~The policy ensures that strategic cycle network schemes, public transport improvements, and necessary road schemes are safeguarded from other developments that could hinder their implementation.~~

Commented [A132]: Text amended to provide greater clarity.

Travel plans, transport statements and transport assessments

~~11.12.~~11.13. This policy requires developments likely to generate significant vehicle movements to be supported by a transport statement or assessment and a travel plan to ensure sustainable travel arrangements.~~.~~

Policy TR03: Travel plans, transport statements and transport assessments

Where development is likely to generate significant amounts of vehicle movements, planning permission will not be granted unless they are supported by a transport

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statement or transport assessment, and subsequent travel plan, that identifies measures to secure new sustainable travel arrangements, taking into account:

A. The scale of the development; and

B. The availability of public transport, walking and cycling opportunities; and

C. Proximity to environmental designations; and

D. Cumulative impacts of other development in the area; and

E. Whether there are particular types of impacts that require further evaluation.

~~F.~~ This policy applies in the Cranbrook Plan area.

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Justification for policy

~~11.13.~~11.14. The spatial strategy and policies prioritising sustainable transport aim to limit the need to travel and offer genuine transport choices. However, new developments will still generate car travel, especially in rural East Devon, necessitating policies to address transport network impacts. Congestion is a particular issue in western East Devon and eastern Exeter, affecting peak travel times.

~~11.14.~~11.15. National policy ~~mandates~~ states that developments generating significant movement ~~must~~ should provide a travel plan and be supported by a transport statement or assessment to evaluate likely impacts. Travel plans are long-term management strategies that integrate sustainable travel ~~proposals~~ into the planning process; whilst, transport assessments thoroughl~~y evaluate~~ assess the transport implications of development, and transport statements offer a lighter-touch approach for limited impacts.

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Parking standards

~~11.15.~~11.16. This policy sets minimum parking standards for new residential and employment developments, considering car and cycle parking requirements to promote sustainable transport and reduce emissions.

Policy TR04: Parking standards

Residential car parking standards

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Parking in new residential development should provide the following minimum parking provision, unless evidence shows that a different provision is more appropriate based on public transport accessibility, the nature of occupants of dwellings or presence of locally available off-road car parking provision.

Type/Use~~Location~~	Car Parking Requirements ~~Affordable housing as a percentage of the site total~~	Cycle Parking Requirements (Secure and Undercover)~~Tenure mix of the affordable housing requirement~~
Residential Dwelling	Average of 1.7 spaces per dwelling (rounded up to the nearest whole number in individual applications).	1 space per Bedroom

Car parking spaces must be of an adequate size to accommodate vehicle parking and have sufficient width to the sides for pedestrian access and egress of vehicles taking account of the location of the parking space and whether or not spaces also serve as access to a property and whether there are adjacent obstructions.

Garage spaces will not count toward the overall quantum of car parking spaces.

Employment and other development parking standards

Car parking provision to serve new employment and other developments should meet the standards set out below, unless it is demonstrated through robust assessment that alternative levels are more desirable and appropriate.

Type/Use	Car Parking	Short Stay Cycle Parking (obvious, easily accessed and close to destination)	Long Stay Cycle Parking (secure and ideally covered)
Class B2/E(g)	1 per 30 sqm	1 per 1,000m^2	1 per 500m^2
Class B8	1 per 200 sqm	1 per 1,000m^2	1 per 500m^2
Class E(a) Non-food retail and general retail	1 per 20 sqm	1 per 6 staff	1per 200 sqm

Class E(a) supermarket/ Food retail	1 per 14 sqm	1 per 6 staff	1 per 200 sqm
Class E(b)/ Sui Generis Hot food takeaways (including drive throughs)	1 per 25 sqm	2 per establishment	1 per 8 staff
Class C1	1 per bedroom	1 space per 10 bedrooms	1 space per 10 staff

All new parking provision must provide provision of charging points to charge electric vehicles and electric bikes.

The section of this policy that falls under the heading of 'Residential car parking standards' does not apply in the Cranbrook Plan area. The section under 'Employment and other development parking standards' does apply in the Cranbrook Plan Area.

Justification for policy

~~11.16.~~11.17. The National Planning Policy Framework (NPPF) outlines five key issues for setting local parking standards: accessibility, development type and mix, public transport availability, local car ownership levels, and the need for charging spaces for ultra-low emission vehicles. Given East Devon's rural nature and higher-than-average car ownership, these standards ensure adequate parking while promoting cycling and reducing emissions. Garages are rarely used for car storage and so will not be counted as part of the required car parking provision.

~~11.17.~~11.18. New residential developments should provide bicycle parking to encourage cycling. In 2019, surface transport emissions accounted for over one-fifth of the UK's total greenhouse gas emissions, with cars and vans contributing 77.9%[70].

[70] C~~C~~FFL-015 - The Sixth Carbon Budget Surface Transport.: https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Surface-transport.pdf [accessed 10th Jan 2025]

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~~11.18.~~11.19. In East Devon, road transport emissions were over one-third of the district's total CO2 emissions. The government mandates increasing production of zero-emission vehicles, aiming for 80% of new cars and 70% of new vans to be zero-emission by 2030, reaching 100% by 2035[71]. East Devon District Council (EDDC) supports this transition through electric vehicle infrastructure and smarter choices.

~~11.19.~~11.20. For residential parking, the ~~methodology is~~ parking figures are based on guidance from the Department for Communities and Local Government (DCLG) and local car ownership data from the 2021 census, resulting in a minimum standard of 1.7 parking spaces per dwelling. In town centres with access to public car parks or on-street parking, lower levels may suffice. In areas with excellent public transport links, car parking spaces may not be necessary.

~~11.20.~~11.21. New employment developments should adhere to the outlined parking standards. Applications proposing different levels must be justified by robust evidence in a Transport Assessment, Transport Statement, or Travel Plan, considering local circumstances.

~~11.21.~~11.22. All new developments must provide Electric Vehicle (EV) charging points in accordance with the Building Regulations 2010[72] and relevant government guidance, including the Devon Electric Vehicle Charging Strategy[73].

[71] TRI-00~~67~~ - Zero Emission Vehicle (ZEV) Mandate Consultation: https://www.gov.uk/government/consultations/a-zero-emission-vehicle-zev-mandate-and-co2-emissions-regulation-for-new-cars-and-vans-in-the-uk/outcome/zero-emission-vehicle-zev-mandate-consultation-summary-of-responses-and-joint-government-response [accessed 9th Jan 2025]

[72] TRI-00~~56~~ - Approved Document S: infrastructure for charging electric vehicles: https://eastdevon.gov.uk/media/ol4el1k1/tri-005-approved-document-s-infrastructure-and-charging-of-evs.pdf~~https://assets.publishing.service.gov.uk/media/6218c5d38fa8f54911e22263/AD_S.pdf~~

[73] TRI-00~~32~~ - Devon Electric Vehicle Charging Strategy: https://eastdevon.gov.uk/media/tcyobx4i/tri-002-devon-electric-vehicle-charging-strategy.pdf ~~https://devoncc.sharepoint.com/:b:/s/PublicDocs/Highways/EYpT2z19y01HsZuuHCvwut8BqqTwB91bzCaxytQ3kmpkkg?e=n3QCnQ~~

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Aerodromes and safeguarding

~~11.22.~~11.23. This policy ensures that developments within aerodrome safeguarded areas and Public Safety Zones do not compromise the safe operation of protected aerodromes or public safety.

Policy TR05: Aerodrome safeguarded areas and Public Safety Zones

Within aerodrome safeguarded areas and the Public Safety Zones for Exeter Airport, planning permission will not be granted for development that would prejudice the safe operation of protected aerodromes or give rise to public safety concerns.

There is a general presumption against new or replacement development or changes of use of existing buildings within Public Safety Zones. In particular, no new or replacement dwellings, mobile homes, caravan sites or other residential buildings will be permitted within a Public Safety Zone. Other forms of development will be acceptable, provided they do not reasonably expect to increase the number of people living, working or congregating in the area.

Development that could have an adverse impact on the operation or safety or navigational systems at the Airport will not be permitted unless they provide suitable mitigation to address adverse impacts arising (for example, funding for system upgrades).

This policy applies in the Cranbrook Plan area.

Justification for policy

~~11.23.~~11.24. The Civil Aviation Authority has identified safeguarded areas around Exeter Airport and Dunkeswell Airport, as well as a MoD facility in Mid Devon affecting the northern part of the plan area. The Council will consult with the Civil Aviation Authority and airport operators on planning applications that could impact airfield operation and safety, following ODPM Circular 1/2003. This includes developments with high structures, those that may interfere with radio signals, or create bird strike hazards.

~~11.24.~~11.25. Public Safety Zones have been ~~,~~ identified by the Department for Transport on land adjoining the runways to Exeter International Airport. A Public Safety Zone is an area within which~~, are areas where~~ the annual risk

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of fatality to a permanent present individual due to ~~from~~ an aircraft accident is not less than 1 in 100,000. Within this area ~~these zones,~~ there is a smaller ~~area~~ zone, where the individual fatality risk is ~~with a higher risk of~~ 1 in 10,000. ~~The policy presumes against new or replacement development or changes of use within these zones, particularly prohibiting new residential buildings. Other developments are acceptable if they do not increase the number of people in the area.~~

~~**11.25.** Developments that could adversely impact the operation or safety of navigational systems at the airport will not be permitted unless they provide suitable mitigation, such as funding for system upgrades.~~

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Communications

11.26. The NPPF guides local authorities to facilitate the development of a high-quality communications infrastructure in support of economic growth and social well-being. The NPPF makes clear that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technologies (such as 5G). Further, the NPPF sets out how these policies should be balanced with other considerations, including conserving and enhancing both the natural and historic environment.

Digital connectivity

11.27. East Devon faces challenges in delivering communications infrastructure in a rural area. East Devon is part of the Connecting Devon and Somerset (CDS) programme. CDS comes under the Government's Superfast Broadband Programme to deliver next-generation broadband infrastructure to areas where the commercial market has failed to invest.

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11.28. According to Ofcom, in 2024 92.53%[74] of the addresses in East Devon have super-fast broadband coverage and 66.05%[75] have ultra-fast broadband coverage, in comparison the mean for all English district local authorities are 96.61% and 73.24%. This policy ensures that major developments have access to superfast broadband and high-quality communications infrastructure, supporting economic growth and social well-being.

~~Strategic~~ Policy TR06: Digital connectivity

Planning permission for major developments, that will be used or occupied by people, will not be granted unless the scheme will have access to terrestrial or satellite superfast broadband and high-quality communications.

All new ducting to serve new developments must be installed with capacity for more than one provider and other provisions to enable the delivery of multi-operator fibre to the premises and sufficient mobile connectivity.

Developers are encouraged to have early discussions with strategic providers or Connecting Devon and Cornwall for major development and East Devon District Council will continue~~ing~~ to support the expansion of full-fibre broadband connections in the district.

This policy applies in the Cranbrook Plan area.

Justification for policy

11.29. Paragraph 118 of the NPPF~~,~~ advises that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.

[74] TRI-01~~09~~ - Percentage of addresses with superfast broadband availability in East Devon, 2024: https://eastdevon.gov.uk/media/cxbfh23j/tri-008-lg-inform-superfast-broadband-availability-in-east-devon.pdf ~~https://lginform.local.gov.uk/reports/lgastandard?mod-metric=3758&mod-area=E07000040&mod-group=AllDistrictsInCountry_England&mod-type=namedComparisonGroup~~

[75] TRI-01~~10~~ - Percentage of addresses with ultrafast broadband availability in East Devon, 2024: https://eastdevon.gov.uk/media/l1iosvlp/tri-009-lg-inform-ultrafast-broadband-availability-in-east-devon.pdf ~~https://lginform.local.gov.uk/reports/lgastandard?mod-metric=9175&mod-area=E07000040&mod-group=AllDistrictsInCountry_England&mod-type=namedComparisonGroup~~

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11.30. The Building etc. (Amendment) (England) (No. 2) Regulations 2022[76] came into force on 26 December 2022. These regulations introduce gigabit broadband infrastructure and connectivity requirements for the construction of new homes in England.

11.31. East Devon District Council would support further digital connectivity and high-quality communications improvements in the district by liaising with delivery partners and operators in the area and supporting the community engagement of their programmes.

Wireless connectivity and telecoms infrastructure

11.32. Fast and reliable wireless connectivity and telecoms infrastructure are essential for supporting smart technology in homes, workplaces, and travel. Businesses depend on robust communications infrastructure to connect with customers, suppliers, and employees, ensuring efficient operations. This infrastructure includes masts, antennas, ground-based cabinets, and compounds.

Policy TR07: Wireless connectivity and telecoms infrastructure

Proposals for wireless connectivity and telecoms infrastructure will only be permitted where they accord with the principles of good practice for wireless network development, including, but not limited to:

A. Site sharing and use of existing infrastructure or buildings to ~~house~~ accommodate new development;

B. Consultation with the local planning authority, local communities and other stakeholders;

C. Considered siting and design, avoiding harm to landscape character, heritage, environment, and bio-diversity; and

D. Compliance with guidance laid out in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) public exposure levels guidance.

Proposals within National Landscapes or at sensitive locations must provide a Landscape and Visual Impact Assessment and, where in the vicinity of a heritage asset as Heritage Impact Assessment.

[76] TRI-0124 - The building etc. (Amendment) (England) Regulations 2022: https://www.legislation.gov.uk/uksi/2022/603/contents/made [accessed 13th Jan 2025]

A condition will be imposed on any permission granted to ensure the removal of equipment, supporting apparatus, and the restoration of the site to its former condition, or to a standard to be agreed with the Authority, as soon as reasonably practicable after it is no longer required for electronic communications purposes.

Where appropriate, future permitted development rights will be restricted by condition to prevent harm to landscape character, heritage, environment, and bio-diversity.

This policy applies in the Cranbrook Plan area.

Justification for policy

11.33. The National Planning Policy Framework (NPPF) highlights the importance of advanced, high-quality, and reliable communications infrastructure for economic growth and social well-being. The Future Telecoms Infrastructure Review (FTIR)[77] and the National Infrastructure Strategy[78] outline the government's strategy for achieving digital connectivity targets and delivering high-quality infrastructure across the UK.

11.34. The Code of Practice for Wireless Network Development in England (2022)[79] guides the provision of telecoms infrastructure, covering all forms of wireless development, including masts and cabinets. This Code was developed by the Department for Digital, Culture, Media and Sport (DCMS) in collaboration with industry representatives, government departments, local planning authorities, and protected landscape bodies.

11.35. Proposals for wireless connectivity and telecoms infrastructure must adhere to the principles of good practice, including site sharing, consultation with stakeholders, considered siting and design, and compliance with International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines. Proposals in National Landscapes or

[77] TRI-013 – Future Telecoms Infrastructure Review, https://eastdevon.gov.uk/media/pqwjpgx5/tri-011-future-telecoms-infrastructure-review.pdf

[78] TRI-014 - National Infrastructure Strategy, https://eastdevon.gov.uk/media/ttifukxq/tri-012-national-infrastructure-strategy.pdf

[79] TRI-0154 - Code of practice for wireless network development in England, 2022: https://eastdevon.gov.uk/media/pqrhlkem/tri-013-code-of-practice-for-wireless-network-development-in-england.pdf ~~https://www.gov.uk/government/publications/code-of-practice-for-wireless-network-development-in-england/code-of-practice-for-wireless-network-development-in-england~~

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sensitive locations require a Landscape and Visual Impact Assessment and, if near heritage assets, a Heritage Impact Assessment.

11.36. Conditions will be imposed to ensure the removal of equipment and site restoration once it is no longer needed for electronic communications. Future permitted development rights may be restricted to prevent harm to landscape character, heritage, environment, and biodiversity.

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Our Outstanding Landscape



Chapter 12. Our Outstanding Landscape

12.1. East Devon has a beautiful natural environment, which makes the District an attractive place to live and work. This environment also attracts visitors who contribute to the local economy.



~~FIGURE 15~~FIGURE 13 East Devon's outstanding landscape

Landscape features

12.2. This policy protects East Devon's landscape, countryside, and rural areas from harmful development. Development is permitted only if a proportionate Landscape Appraisal demonstrates it will protect and enhance valued landscape attributes and special features.

Strategic Policy OL01: Landscape features

East Devon's landscape, countryside and rural areas will be protected against harmful development. Development will only be permitted where the applicant is able to demonstrate through a proportionate Landscape Appraisal that it will protect and enhance valued landscape attributes and special features and qualities that contribute

to the character of East Devon's landscapes, in particular where it would not harm the distinctive landscape, amenity and environmental qualities within which it is located, including:

A. Land form and patterns of settlement;

B. Important natural and manmade features which contribute to the local landscape character, including topography, traditional field boundaries, trees and woodlands, areas of importance for nature conservation and rural buildings;

C. The adverse disruption of a view from a public place which forms part of the distinctive character of the area or otherwise causes significant visual intrusions; and

D. Aesthetic and perceptual factors such as tranquillity, wildness and dark skies.

All development in the countryside should have regard to the most up to date Landscape Characterisation Assessments as a basis for understanding, maintaining and enhancing local distinctiveness and landscape character as well as up to date strategy and guidance for trees and woodlands.

This policy applies in the Cranbrook Plan area.

Justification for policy

12.3. This overarching policy aims to protect important landscape features, whether designated or not. A key objective of the Local Plan is to conserve and enhance the environment, landscape, historic character, archaeological value, wildlife, agricultural, recreational, and natural resource value of countryside areas. All development in the countryside should consider the District Landscape Characterisation Assessment (LCA)[80] and the Council's Tree Strategy[81] to maintain and enhance local distinctiveness and landscape character.

[80] ENV-002 – East Devon and Blackdown Hills Landscape Character Assessment, https://eastdevon.gov.uk/media/nr3lkwr3/env-004-east-devon-and-blackdown-hills-landscape-charachter-assessment.pdf

[81] ENV-008 – Tree, Hedge & Woodland Strategy for East Devon 2024-2034, https://eastdevon.gov.uk/media/41ef4fiw/eddc_treewoodlandhedgerowstrategy_v1-4.pdf

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12.4. East Devon's landscape includes deep valleys, wooded hills, ancient woodlands, historic parkland, low-lying farmland, riverside meadows, and various urban forms. The district is rich in biodiversity, with international, national, and locally protected sites and habitats forming part of a wider ecological network. Maintaining sustainable agricultural land and practices is crucial for preserving the district's rural character and landscape.

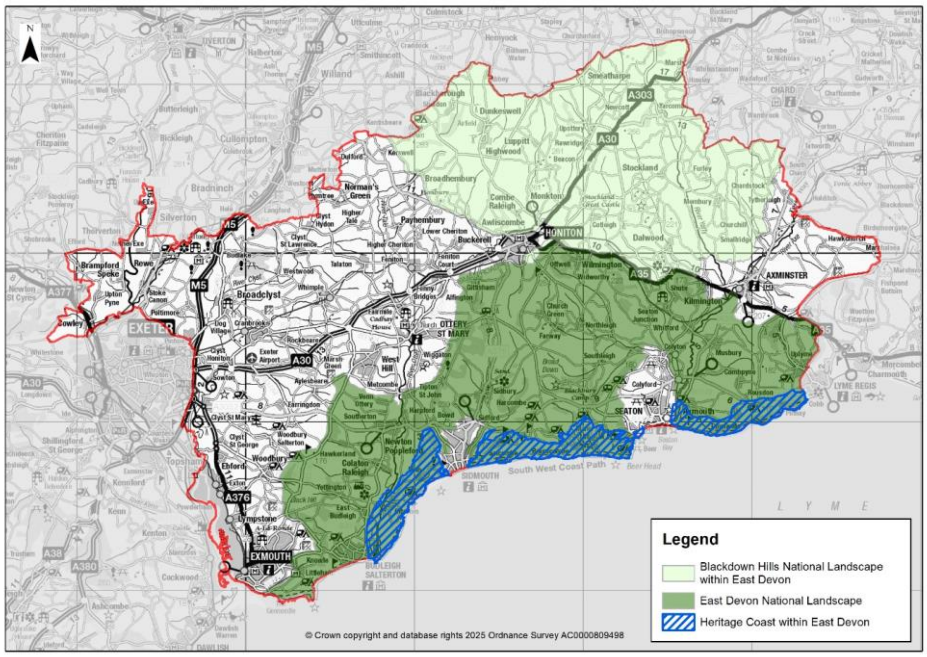
12.5. Proposals should be accompanied by a proportionate Landscape Appraisal, conducted in accordance with the Guidelines for Landscape and Visual Impact Assessment[82] and successor documents. The level of detail required will depend upon the scale and type of development, the likely impact and the characteristics of the landscape within which it is located. If a full Environmental Impact Assessment (EIA) is required, a Landscape and Visual Impact Assessment (LVIA) by a Chartered Landscape Architect will be necessary.

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[82] Guidelines for Landscape and Visual Impact Assessment 3rd Edition, 2013 (Landscape Institute & IEMA)

National Landscapes

~~12.6.~~ This policy ensures the highest level of protection for the landscape and scenic beauty of National Landscapes (NLs) in East Devon, including the Heritage Coast.



12.6.

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~~FIGURE 16~~FIGURE 14 East Devon has significant National Landscapes (formerly AONB's) and Heritage Coast. ~~Update map to reflect new terminology~~

Strategic Policy OL02: National Landscapes (Areas of Outstanding Natural Beauty)

The highest level of protection will be given to the landscape and scenic beauty of the National Landscapes (NL's) in East Devon:

A. Development in a NL, or outside but affecting its setting or appearance, will only be permitted where it avoids harm and contributes to the protection, conservation and enhancement of the special qualities, character and natural beauty of the NL

(including the coastline, where relevant);~~conserves and enhances the character and natural beauty of the NL~~;

B. Major development in a NL will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest; and

C. Any relevant National Landscape Management Plans will be a material consideration in decision making.

This policy will also apply to the Heritage Coast.

This policy applies in the Cranbrook Plan area.

Commented [A137]: Text expanded to reflect recent changes in guidance

Justification for policy

12.7. National Landscapes (NLs), formerly Areas of Outstanding Natural Beauty (AONBs), cover around two-thirds of East Devon, including several villages and Budleigh Salterton. The district contains two NLs: the East Devon NL in the south and the Blackdown Hills NL in the north, which extends into neighbouring Mid Devon and Somerset. A small part of the Dorset NL also extends into the east of the district. These areas have the highest level of landscape protection in England, equivalent to National Parks, and are designated by the Secretary of State, meaning their boundaries and statutory protection cannot be altered through the local plan process.

12.8. This policy is necessary to ensure the protection and conservation of East Devon's NLs in accordance with the Countryside and Rights of Way Act 2000 (CROW Act)[83], the Levelling Up and Regeneration Act 2023[84], and the National Planning Policy Framework (NPPF). The Council has a duty to 'seek to further' the statutory purposes of Protected Landscapes and recognise these in reaching decisions and undertaking activities that impact these areas.

Commented [A138]: New guidance affects the way in which we consider protected landscapes in decision making. This text highlights changes to the duty.

~~12.8.~~**12.9.** Heritage Coasts (as distinct from Coastal Preservation Areas or the Jurassic Coast) were defined by Natural England and the relevant maritime local authorities to conserve the best stretches of undeveloped coast in England. In East

[83] ENV-015 – Countryside Right of Way (CROW) Act 2000, https://www.legislation.gov.uk/ukpga/2000/37/contents [accessed 15th Jan 2025]

[84] ENV-016 – Levelling Up and Regeneration Act (LURA) 2023. https://www.legislation.gov.uk/ukpga/2023/55/contents [accessed 15th Jan 2025]

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Devon the Heritage Coast lies within the National Landscape and the same policy considerations will apply to both areas.

Coastal Preservation Areas

~~12.9.~~12.10. This policy designates land around the coast and estuaries of East Devon as a Coastal Preservation Area, protecting its undeveloped and open status while supporting appropriate proposals that improve~~ncrease~~ public access to the coast.

Strategic Policy OL03: 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. Development or any change of use in the defined area will not be allowed if it would damage the undeveloped/open status of the designated area or where visually connected to any adjoining areas.

The Coastal Preservation Area is defined on the basis of visual openness and views to and from the sea or estuaries. ~~Appropriate P~~proposals which in~~crease~~ improve public access to the coast will be supported where appropriate.

This policy does not apply in the Cranbrook Plan area.

Justification for policy

~~12.10.~~12.11. ~~The majority of East Devon's coastline is part of the Jurassic Coast World Heritage Site (WHS), recognised by UNESCO for its outstanding rocks, fossils, and landforms. The wider setting of the cliffs significantly contributes to the landscape.~~ The National Planning Policy Framework (NPPF) requires local authorities to maintain the character of the undeveloped coast while improving public access where appropriate. This policy protects the character of the undeveloped coast, including the WHS, and designates a Coastal Preservation Area based on a detailed character assessment of visual openness and views to and from the sea.

Commented [A139]: Inclusion of wording is misleading. The Jurassic Coast is not a reason for Coastal Preservation Area designation.

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Areas of Strategic Visual Importance

~~12.11.~~12.12. This policy ensures that development proposals preserve the visual integrity, identity, and scenic quality of East Devon by conserving and enhancing key views and landmarks.

Policy OL04: Areas of strategic visual importance

Development proposals will only be permitted where they preserve the visual integrity, identity and scenic quality of the district, in particular by conserving and enhancing key views and views of local landmarks, including those identified in Neighbourhood Plans.

The following view types are considered to be particularly important:

A. Landmark views to and from viewpoints and tourism and recreational destinations, including the coast, woodland and open countryside;

B. Views from publicly accessible areas which are within, to or from settlements which contribute to the viewers' enjoyment of the local area;

C. Views from public rights of way and other publicly accessible areas;

D. Night-time views of dark skies, particularly where lighting is to be introduced in areas of low existing light pollution; and

E. Views which include or otherwise relate to specific features relevant to East Devon and its special qualities, such as key landmarks, heritage assets (either in view or the view from) and biodiversity features.

Development proposals should conserve and enhance sequential views, and not result in adverse cumulative impacts within views.

This policy applies in the Cranbrook Plan area.

Justification for policy

~~12.12.~~12.13. The policy aims to protect important views and landmarks, encouraging the conservation and enhancement of key view types and patterns. It ensures development does not detract from the visual integrity, identity, and scenic quality characteristic of East Devon. Site-based assessments should follow

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the latest guidelines for Landscape and Visual Impact Assessment (LVIA) [85] and be proportionate to the scheme's size and impact. If an LVIA is not required, a simple landscape assessment may suffice.

~~12.13.~~12.14. Sources of information for assessments include the East Devon and Blackdown Hills Landscape Character Assessment (2019)[86], What Makes a View (Blackdown Hills AONB, 2013)[87], the Devon historic environment record[88], Village Design Statements, Conservation Area Character Appraisals and Management Plans, Local Landscape Character Assessments, and Neighbourhood Plans. These should inform development proposals and be provided early in the planning process.

Green wedges

~~12.14.~~12.15. This policy restricts development within green wedges to prevent settlement coalescence and maintain the individual character and identity of settlements.

Policy OL05: Green wedges

Within green wedges, as defined on the Policies Map, development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.

This policy does not apply in the Cranbrook Plan area.

[85] Guidelines for Landscape and Visual Impact Assessment 3rd Edition, 2013 (Landscape Institute & IEMA)

[86] ENV-002 - East Devon and Blackdown Hills Landscape Character Assessment, ~~2019:~~ ~~https://eastdevon.gov.uk/media/2816886/lca_complete_final_march-2019_low-res.pdf~~ https://eastdevon.gov.uk/media/nr3lkwr3/env-004-east-devon-and-blackdown-hills-landscape-charachter-assessment.pdf

[87] ENV-003 - What makes a view? ~~2013: https://blackdownhillsaonb.org.uk/wp-content/uploads/2018/05/what-makes-a-view.pdf~~ https://eastdevon.gov.uk/media/5gdpc1hk/env-005-what-makes-a-view.pdf

[88] ENV-017 - Devon Historic Environment Record,~~:~~ https://www.devon.gov.uk/historicenvironment/the-devon-historic-environment-record/ [accessed 14th Jan 2025]

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Justification for policy

~~12.15.~~12.16. Green wedges are a long-standing local landscape designation that maintains open green networks between settlements to prevent coalescence and preserve local identity. New buildings within green wedges are restricted to ensure the openness, role, and function of these landscapes are not adversely affected. Proposals for new buildings must be proportionate in size and scale to their intended use and~~, with~~ evidence may be required to justify new or~~for~~ larger ~~agricultural~~ buildings~~.~~

~~12.16.~~12.17. Essential infrastructure, such as sewage or water connections, power sources, waste water recycling/treatment sites, electricity substations, new roads, emergency services, or telecommunications, is permitted if necessary for connection purposes and if benefits outweigh the impact on the designation. Buildings for outdoor sport and recreation, cemeteries with ancillary buildings, and allotments are acceptable in principle, judged on a site-by-site basis.

The Council supports new buildings for community use, including educational facilities, if a green wedge location is justified. ~~Economic growth and re-use of existing buildings for employment must not undermine the green wedge's role and function or lead to or contribute to settlement coalescence. New buildings for employment are permitted only if they support the sustainable growth of existing, authorised rural businesses. Start-up businesses are not permitted to avoid proliferation of new buildings unconnected to existing sites and uses, which may harm openness and landscape character.~~

Land of Local Amenity Importance and Local Green Space

The policies in this plan provide important protection to the natural environment within East Devon and are likely to help preserve the character and integrity of important green areas within and around the District. However, there is potential for development pressure to erode and impact upon smaller green areas which are particularly important to local communities. This policy seeks to give added protection against development to specific locally valued green areas or open spaces, including those which are identified during the period of this Local Plan.

~~12.17.~~12.18.

Commented [A140]: Evidence to justify new or larger buildings will not be restricted to large agricultural buildings as other types of development will also impact the purpose/character of the GW

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Policy OL06: Land of Local Amenity Importance and Local Green Space

This policy will apply to Local Green Spaces, designated through Neighbourhood Plans (and identified on maps in those documents), and to the established Land of Local Amenity Importance areas (as shown on the Policies Map).

Within the Local Green Space or Land of Local Amenity Importance areas, development will be restricted to those limited types of appropriate development set out below, unless very special circumstances can be demonstrated.

Appropriate development, compatible with the reasons for which the land was designated, is considered to be:

A. Buildings for agriculture and forestry;

B. Provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries and allotments, provided they do not conflict with the purpose of the LGS/LLAI designation;

C. The extension or alteration of a building provided that it does not result in a disproportionate addition over and above the size of the original building; and

D. The replacement of a building, provided the new building is ~~in the same (or a preferable)~~for a community use and not materially larger than the one it replaces.

All development proposals should be carefully designed and managed to minimise visual impact, respect the reasons for which the site was designated, and ensure the continued integrity of the site.

Development proposals outside LLAI or LGS, but conspicuous when viewed from it, should minimise any detrimental impacts to the visual amenity and respect reasons for which the site was designated. Development proposals which improve accessibility to, or enhance the use of LLAI/LGS will be supported.

This policy applies in the Cranbrook Plan area.

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Justification for policy

~~12.18.1.1. The policies in this plan provide important protection to the natural environment within East Devon and are likely to help preserve the character and integrity of important green areas within and around the District. However, there is potential for development pressure to erode and impact upon smaller green areas which are particularly important to local communities. This policy seeks to give added protection against development to specific locally valued green areas or open spaces, including those which are identified during the period of this Local Plan.~~

12.19. The Land of Local Amenity Importance designation will convey protection separate to (and in some cases in addition to) the Local Green Space designation which some East Devon communities have identified (and will identify) through Neighbourhood Plans.

12.20. Land of Local Amenity Importance is a long-standing designation recognising a number of specific small parcels of land highly valued by local communities. The Local Plan recognises the particular visual, and other, importance of 14 sites within 5 of the District's towns and restricts development that is not for a community purpose or that would undermine the open character of the area. The sites are deemed to be locally significant, with opportunities of enhancement to provide multiple benefits, including improved water quality, access, biodiversity, recreational, health and educational benefits.

12.21. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. It is envisaged that communities will use this designation to formally protect such areas in future, rather than identifying additional Land of Local Amenity Importance. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. As outlined in national policy, Local Green Space designation should only be used where the green space is in reasonably close proximity to the community it serves; demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of wildlife; and local in character and is not an extensive tract of land.

12.22. As additional Local Green Spaces may be identified during the life of the Local Plan it is not possible to identify these areas on the Policies Map, but the policy will apply to LGS in made Neighbourhood Plans.

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12.23. Development within, or in close proximity to the Local Green Space or Land of Local Amenity Importance, should respect reasons for which the site was designed and minimise any impacts on it.

Contaminated land

12.24. This policy requires a contaminated land assessment for development sites where contamination is anticipated, ensuring safe remediation and mitigation.

Policy ~~OL08~~OL07: Contaminated land

Where it is anticipated that contamination may be present on or near to a development site, planning applications should be supported by a proportionate contaminated land assessment. The assessment must:

A. Identify and characterise the contamination;

B. Identify the risks; and

C. Identify remediation and/or mitigation measures if required.

Where identified as necessary, agreed measures must be taken to remediate the site prior to or during development. Ongoing monitoring may also be required.

Development on or in close proximity to active or former waste sites will only be permitted where it can be demonstrated that there will be no harm to future occupiers of the site from leachate or landfill gas or other waste arising.

This policy applies in the Cranbrook Plan area.

Justification for policy

12.25. East Devon has a limited amount of contaminated land, but safe decontamination is ~~beneficial~~~~essential~~~~all~~essential. Remediating and mitigating contaminated or unstable land enhances the local environment. Applications must demonstrate site suitability, considering ground conditions, hazards, and remediation proposals. After remediation,

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land must not be classified as contaminated under the Environmental Protection Act 1990.[89]

Potentially hazardous developments and notifiable installations

12.26. This policy ensures that development within notified consultation zones around hazardous installations poses no health and safety risks.

Policy ~~OL09~~OL08: Potentially hazardous developments and notifiable installations

Proposals for development within a notified consultation zone around a hazardous installation will be permitted only if there is no health and safety risk to that development or occupants, users or the development or to surrounding areas.

This policy applies in the Cranbrook Plan area.

Justification for policy

12.27. Certain sites and pipelines are designated as notifiable installations due to hazardous substances. East Devon contains high-pressure gas pipelines and other hazardous sites. While these are regulated under health and safety legislation, controlling development near these zones is prudent. The Health and Safety Executive hold records of affected areas and advise~~s~~ on consultation distances. Consent for hazardous substance-related development will not be granted if it increases health and safety risks.

Commented [A142]: EDDC hold records for internal use, however applicants should not rely on these as being available or accurate and should use the source data

Control of pollution

12.28. This policy prevents development that would result in unmitigated pollution, protecting the environment and public health.

[89] ENV-018 – Environmental Protection Act 1990, https://www.legislation.gov.uk/ukpga/1990/43/contents [accessed 14th Jan 2025]

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Policy ~~OL10~~OL09: Control of pollution

Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include:

A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot;

B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;

C. Noise and/or vibration;

D. Light intrusion, where light overspill from street lights or floodlights on to areas not intended to be lit, particularly in areas of open countryside and areas of nature conservation value;

E. Fly nuisance;

F. Pollution of sites of wildlife value, especially European designated sites or species;

G. Odour.

Where there is an identified risk of pollution, new development should be accompanied by a construction environment management plan (CEMP) to include details of protection, mitigation and enhancement measures, including SuDS and how soil will be managed during construction to avoid compaction and sediment laden run-off.

This policy applies in the Cranbrook Plan area.

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Justification for policy

12.29. Pollution significantly impacts health and quality of life. Development proposals must consider potential pollution effects, and relevant authorities will be consulted early in the process. The Council aims to control and reduce pollution, requiring detailed lighting schemes to minimise light pollution. Decisions will ensure new developments

do not pose pollution risks to existing developments and are appropriate for their location.

12.30. Where there is an identified risk of pollution, new development should be accompanied by a Construction Environment Management Plan (CEMP). The CEMP should include details of protection, mitigation, and enhancement measures, such as Sustainable Drainage Systems (SuDS) and soil management during construction to avoid compaction and sediment-laden run-off.

12.31. The Council will consult statutory pollution control authorities at an early stage for proposals that may raise pollution concerns. This ensures that developments are assessed for their potential impacts on health, the natural environment, and amenity. The cumulative impacts on air quality will be considered, and developments within Air Quality Management Areas must align with local air quality action plans.

12.32. External lighting proposals must demonstrate that lighting is the minimum needed for security and working purposes, minimising light pollution from glare and spillage. This is particularly important in areas of open countryside and nature conservation value, ensuring that lighting does not detract from residential amenity or highway safety.

12.33. By addressing these various forms of pollution, the policy aims to safeguard the environment and public health, ensuring that development in East Devon is sustainable and responsible.

High quality agricultural land

12.34. This policy restricts development on the best and most versatile agricultural land (Grades 1, 2, and 3a) unless there is an overriding need and no suitable lower-grade land is available.

Policy ~~OL11~~OL10: Development on high quality agricultural land

Unless allocated for development under another plan policy, planning permission for development affecting the best and most versatile agricultural land (Grades 1, 2 and 3a) will only be granted exceptionally if ~~if there is an overriding need for the development and either~~:

A. Sufficient land of a lower grade (Grades 3b, 4 and 5) is unavailable, or available lower grade land has an environmental value recognised by a statutory wildlife,

Commented [A143]: This policy is v similar to adopted LP policy EN13. The recent appeal decision at Sidmouth Rd, OSM, said parts of this policy are too onerous vs. the NPPF. So check policy and re-word as necessary.

Commented [A144]: Change made in response to consideration by committee on 11 Dec 2024.

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historic, landscape or archaeological designation outweighing the agricultural considerations; or

B. The benefit of the development justifies and clearly outweighs the loss of high quality agricultural land.

~~If best and most versatile land needs to be developed, and~~If there is a choice between sites in different grades, land of the lowest grade available must be used except where other sustainability considerations, including intrinsic nature conservation value of a site, outweigh land quality issues.

Where best and most versatile land is developed a soil handling plan and sustainable soil management strategy based on detailed soil surveys should be submitted as part of the planning application. Topsoil should be protected during development and retained for reuse.

This policy applies in the Cranbrook Plan area.

Commented [A145]: Topsoil is identified as important and relevant for retention.

Justification for policy

12.35. East Devon has a significant amount of high-quality agricultural land, particularly near settlements where development pressures are greatest. Local Plan policy aims to conserve and protect the highest grades of agricultural land, balancing this with the need to accommodate development.

12.36. Soils are a finite, multi-functional resource essential for wellbeing and prosperity. Development decisions should consider the impact on soils, their intrinsic character, and the sustainability of the ecosystem services they provide. When developing the best and most versatile agricultural land, a soil handling plan and sustainable soil management strategy, based on detailed soil surveys, will be required to minimise detrimental impacts and ensure that topsoil is retained on site wherever possible.

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Our Outstanding Biodiversity and Geodiversity



Chapter 13. Our Outstanding Biodiversity and Geodiversity

Introduction

13.1. East Devon boasts a rich abundance of biodiversity and geodiversity, from Internationally Designated Sites to extensive networks of priority habitats and protected species. These resources are invaluable for nature conservation, scientific research, health and wellbeing, education, climate change mitigation, flood risk management, air and water purification, and the economy.

13.2. However, these natural assets are threatened by factors such as climate change, agriculture, pollution, land use change, urbanisation, and population growth. These impacts can be complex, arising through both direct and indirect mechanisms.

13.3. The importance of wildlife and the natural world is increasingly recognised by the Government, as evidenced by the Environment Act 2021[90] and the Government's 25 Year Environment Plan[91].

13.4. The new local plan policies aim to protect, enhance, and expand existing biodiversity features while creating new habitats. The plan seeks to improve the quality and accuracy of ecological information and enhance avoidance, mitigation, and compensation outcomes from granted permissions.

13.5. All proposals should follow the Mitigation Hierarchy: first, avoid biodiversity impacts; if unavoidable, mitigate them; and as a last resort, compensate for residual impacts. Compensation should only be considered when avoidance and mitigation are unachievable. For developments requiring a Habitats Regulations Assessment,

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[90] ENV-013 – Environment Act 2021, https://www.legislation.gov.uk/ukpga/2021/30/contents [accessed 9th Jan 2025]
[91] ENV-014 – A Green Future: Our 25 Year Plan to Improve the Environment, https://eastdevon.gov.uk/media/0kjlidka/env-016-25-year-environment-plan.pdf

compensation is only permissible under exceptional circumstances of overriding public interest.



~~FIGURE 17~~FIGURE 15 Seaton Wetlands

Protection of wildlife sites

13.6. Many sites in East Devon are protected due to their intrinsic importance and the wildlife they support. These sites receive considerable legal protection, which is further articulated through planning policy. This policy clarifies existing legislation and government guidance, detailing when impacts may be permitted, expectations for biodiversity enhancement, and the designations included within the policy scope.

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Stategic Policy PB01: Protection of internationally and nationally important wildlife sites

International and nationally designated wildlife sites are of greatest importance and must be given upper most protection.

Development proposals that would cause a direct or indirect adverse effect upon internationally and nationally designated sites will not be permitted unless all of the following criteria are met:

A. They cannot be located on alternative sites that would cause less or no harm;

B. The public benefits of the proposal clearly outweigh the impacts on the features of the site and the wider network of natural habitats and designated sites;

C. Suitable avoidance and mitigation (and exceptionally where legally compliant compensation) measures are secured, in accordance with the mitigation hierarchy;

D. Where permanent or long-term temporary habitat loss or direct reduction of habitat condition is identified, bespoke compensation measures will need to be agreed. This must be undertaken as early as possible and include utilisation of the Discretionary Advice Service from Natural England; and

E. In respect of internationally designated sites, the overall coherence of the national site network must be maintained.

Internationally designated sites falling under this aspect of policy include:

A. Special Areas of Conservation (SAC);

B. Special Protection Areas (SPA);

C. Proposed SACs;

D. Potential SPAs;

E. Ramsar sites;

F. Proposed Ramsar sites.

G. Areas secured as compensation for damage to an internationally or nationally designated site

Nationally designated sites falling under this aspect of policy include:

A. Sites of Special Scientific Interest (SSSI);

B. Marine Conservation Zones (MCZ);

C. National Nature Reserves (NNR).

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~~C.~~ This policy applies in the Cranbrook Plan area.

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Justification for policy

13.8. Statutory designated wildlife sites benefit from substantial protection under national legislation. This policy does not duplicate these protections but provides additional detail on permissible impacts and biodiversity enhancement expectations. ~~It also includes a specific Habitats Regulations Assessment (HRA) policy detailing requirements and existing East Devon mitigation strategies for impacts on European sites.~~

Commented [A146]: Habitat Regulation Assessment considerations are addressed through policy further ion in this chapter. Text is inappropriate here.

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Policy PB02: Protection of regionally and locally important wildlife sites

Development proposals that would cause a direct or indirect adverse effect upon Regionally and Locally important wildlife sites and features will not be permitted, unless all the following criteria are met:

A. They cannot be located on alternative sites that would cause less or no harm. When destruction of these habitats is proposed, proof of there being no satisfactory alternative will need to be provided;

B. The public benefits of the proposal clearly outweigh the impacts on the features of the site and the wider network of natural habitats and designated sites;

C. The sites have been surveyed in the optimal botanical period by a suitably experience botanist (FISC[92] level 4 (or equivalent) or above) in accordance with published (or updated) designation criteria[93] and suitability assessment; and

D. Suitable avoidance, mitigation and compensation measures are proposed, in accordance with the mitigation hierarchy, ~~consummate~~ commensurate with the ecological value of the site affected, secure for the duration of the development, and providing like-for-like habitat restoration and/or ~~creation, and~~creation and ensuring that there is no degradation to the wider ecological networks and priority habitats.

Such sites include:

A. Local Nature Reserves (LNR);

B. County Wildlife Sites (CWS);

C. Unconfirmed Wildlife Sites (UWS);

D. Special Verges designated for biodiversity.

~~D.~~ This policy applies in the Cranbrook Plan area.

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[92] ENV-019 - Field Identification Skills Certificate, https://bsbi.org/field-skills [accessed 7th Jan 2025]

[93] ENV-004 - The Devon Local Sites Manual Policies and Procedures for the Identification and Designation of Wildlife Sites, ~~2022:~~ https://www.dbrc.org.uk/wp-content/uploads/2022/03/CWS-Guidelines-and-appendices-V1.4-March-2022.pdf [accessed 15th Jan 2025]

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Justification for policy

13.9. Non-statutory sites of regional and local importance have limited protection under national legislation, relying on local planning policy and the NPPF. The council recognises the biodiversity value and strategic importance of these sites and priority habitats. These ecologically important and often irreplaceable features play a major role in ecosystem resilience and nature recovery. This policy provides clarity on when impacts may be permitted, expectations for biodiversity enhancement, and the designations included within the policy scope. County Wildlife Sites are determined by the Devon Wildlife Trust following rigorous assessment criteria. Unconfirmed County Wildlife Sites have been subject to initial review but not fully assessed to justify designation.

Irreplaceable habitats and important features

13.10. This policy aims to protect irreplaceable habitats and important features such as ancient woodlands, veteran trees, and species-rich hedgerows from destruction or degradation.

Policy PB03: Protection of irreplaceable habitats and important features

Development proposals which would result in the destruction or degradation of irreplaceable habitats~~(1)~~ will be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists;- this includes impacts through direct, adjacent, or indirect pathways, including lighting and pollution.

Habitats include:

- **Aancient woodland, ancient and veteran trees** (within and outside of ancient woodland).

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Mature trees

Mature trees showing early signs of veteranisation or trees classified as 'notable' will require a high evidence burden for any proposed impacts, with mitigation and compensation measures consummate with their value.

Hedgerows

Important hedgerows as defined by the Hedgerow Regulations 1997[94], and species-rich Devon hedges have a very high intrinsic biodiversity value. Proposals resulting in the loss and/or degradation of these hedgerows, will only be permitted where the mitigation hierarchy has been applied and evidenced in earnest.

Impacts should first be avoided, and where this is not possible, justification for impacts should be provided in full. Following this, suitable avoidance and mitigation measures should be proposed, followed by compensation measures as a last resort. Any compensatory hedges should be species-rich, include a bank, standard trees, and be mindful of temporal time scales to become a functional habitat in their replacement ratios.

Hedgerow translocation should always be considered first, as a preferential option to hedgerow destruction followed by compensation.

Hedgerow management should be in accordance with, Hedgelink guidance and the Tree, Hedge, and Woodland Strategy for East Devon. Any new hedges must be distinctive to the local area.

Priority Habitats[95] and habitats supporting protected and notable species

Impacts on Priority Habitats and habitats which support the functionality of Priority Species, such as bat foraging and commuting habitats, cirl bunting nesting and foraging habitat will require adequate mitigation and compensation for any potential direct or indirect adverse impacts from development.

Mitigation and compensatory requirements, including details regarding long-term maintenance of functional habitats, must be explicitly quantified within submitted Ecological Impact Assessments (EcIAs) to ensure these can be appropriately secured. EcIAs should be informed by recent survey information undertaken at suitable time of year following best practice guidelines and BS 42020:2013[96] (or superseding standard).

[94] ENV-020 – The Hedgerows Regulations 1997, https://eastdevon.gov.uk/media/zolnismd/env-020-the-hedgerows-regulations-1997.pdf

[95] Habitats of Principle Importance, as listed under Section 41 of:~~of the~~ ENV-007 - ~~-~~Natural Environment and Rural Communities (NERC) Act 2006,~~:~~ https://www.legislation.gov.uk/ukpga/2006/16/contents (identified through site survey work or as identified through existing mapped resources)

[96] ENV-029 - BS 42020:2013 Biodiversity. Code of practice for planning and development, https://knowledge.bsigroup.com/products/biodiversity-code-of-practice-for-planning-and-development?version=standard [accessed 15th Jan 2025]

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This policy applies in the Cranbrook Plan area.

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Justification for policy

13.11. Some habitats, including ancient woodlands and veteran trees, are irreplaceable due to their age, uniqueness, and biodiversity. Planning permission will not be granted for proposals that could harm these habitats unless there are exceptional reasons and a robust mitigation/compensation strategy, as per the NPPF.

13.12. Hedgerows, particularly in East Devon, are valuable biodiversity resources often threatened by development. Protecting and enhancing these features is crucial. The policy promotes the translocation of hedgerows over destruction, ensuring better quality and retention of ecological niches. ~~Decision-makers should ensure that~~ All development proposals should include adequate mitigation and compensation measures, informed by recent ecological surveys and best practice guidelines.

Habitat Regulation Assessment

13.13. The most significant wildlife sites in East Devon benefit from an international designation and for these sites and where adverse impacts may be possible from development there is a need for assessment under the Habitat Regulations to determine the acceptability of proposals. Plan policy set out details of the approach to be taken.

Strategic Policy PB04: Habitats Regulations Assessment

HRA avoidance and mitigation strategies and guidance

Subject to exceptional circumstances referred to in policy PB01, proposed plans or projects must not adversely affect the integrity of sites protected under the Conservation of Habitats and Species Regulations 2017[97]. These sites consist of:

A. Special Areas of Conservation (SAC);

[97] ENV-021 – The Conservation of Habitats Species Regulations 2017, https://www.legislation.gov.uk/uksi/2017/1012/contents [accessed 14th Jan 2025]

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B. Special Protection Areas (SPA);

C. Proposed SACs;

D. Potential SPAs;

E. Ramsar sites;

F. Areas secured as sites compensating for damage to a European site.

The proponent of the plan or proposal must provide all necessary information to allow the planning authority to carry out Habitats Regulations Assessment (HRA) of the proposal.

Where there are likely significant effects to a European site, alone or in-combination, from an application, mitigation measures will need to be secured. Appropriate assessment will be necessary and will need to ensure mitigation measures are adequate and secured for as long as the impact might occur. Legislation and government guidance requires the planning authority to be confident beyond reasonable scientific doubt that the proposals will not result in an adverse effect on the integrity of the site. Consequently, we will require evidence of a high quality and accuracy to inform HRA and we will seek the advice of the statutory conservation body (Natural England).

Where it is not possible to rule out adverse effects on integrity, alone or in-combination with other plans or projects, permission will only be granted in exceptional circumstances. In such cases it will be necessary to demonstrate that there are no alternatives, there is over-riding public interest and compensation can be secured).

Specific HRA mitigation strategies and guidance

Plans and proposals should take into consideration and be in accordance with the latest versions of all council and wider HRA guidance documents and strategies. These documents and strategies are intended to facilitate HRA assessment by providing a coherent strategic approach to the delivery of mitigation requirements whilst avoiding unnecessary duplication of assessment effort~~, where applicable~~. These documents include (existing and pending production):

A. South-East Devon European Sites Mitigation Strategy (existing – and undergoing review)

B. Beer Quarry Caves SAC Guidance Document (existing)

C. Exmouth Imperial Recreation Ground Events Protocol (existing)

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D. River Axe SAC Mitigation Strategy (proposed)

E. Pebblebed Heaths - Vehicle emission impacting on designated site~~s~~ (proposed)

Specific HRA policy requirements in relation to avoiding, mitigating and compensating for HRA impacts

The South-East Devon European Sites Mitigation Strategy (SEDESMS)[98]

In respect of the Exe Estuary SPA and the East Devon Pebblebed Heaths SPA/SAC (and Dawlish Warren SAC in Teignbridge District) an over-arching strategic approach to HRA mitigation has been established and a new strategy is nearing completion at early 2025. All residential development schemes within a straight line 10 kilometers distance of any part of the European sites will be required to provide mitigation to offset increased recreational pressure associated with new development.

Developers must clearly demonstrate that mitigation can and will be provided to ensure no adverse effect on the integrity of the European sites and identify and secure mechanisms through which delivery will be achieved, secured in perpetuity, and delivered within agreed timescales. All mitigation is to be delivered in accordance with the most recently adopted/approved version of the strategy and supporting guidance.

Development within 400m of the East Devon Pebblebed Heaths – SPA and SAC

Predation of birds by domestic cats, direct recreational disturbance, ~~and~~ dog related impacts and urban effect impacts are identified as a particular concern on the East Devon Pebblebed Heaths. To help preserve the integrity of the East Devon Pebblebed Heaths, specifically on account of these potential impacts, new dwellings and tourist accommodation or other developments that may result in unacceptable impacts will not be permitted on or within 400 meters of the Pebblebed Heaths.

Nutrient neutrality in the River Axe SAC catchment

East Devon District Council requires development proposals within the River Axe SAC catchment to demonstrate how nutrient neutrality will be achieved in accordance with the latest guidance and nutrient budget calculator provided by Natural England or local calculator (if subsequently approved). Non-standard proposed mitigation

[98] ENV-00913 - South-east Devon European Site Mitigation Strategy 2014 - https://eastdevon.gov.uk/media/369997/exe-overarching-report-9th-june-2014.pdf

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techniques will require evidence of their effective use elsewhere and/or utilisation of Natural England Discretionary Advice Service.

Protection of Beer Quarry Cave SAC bat pinch points between Seaton and Colyford, and between Colyford and Colyton[99]

In order to protect the pinch points and secure their long-term suitability for the SAC bat species, the council will not support any applications which reduce the quality or functionality of the bat foraging and commuting habitats within these pinch points, such as through hedgerow\tree loss and adverse impacts from lighting. The objective is for these pinch points to be retained in perpetuity and enhanced where possible in order to guard against potential future development pressure.

Vehicle emission impacting on designated sites

Development will not be permitted where there is potential for increased vehicle numbers, applying a precautionary approach, resulting in increases of emissions of nitrogen oxides (NOx) and/or ammonia (NH3), from internal combustion engine vehicles~~, to~~ exceeding threshold levels of harm to designated sites (specifically the Pebblebed Heaths).

This policy applies in the Cranbrook Plan area.

Justification for policy

13.14. As a Competent Authority, the planning authority must carry out Habitats Regulations Assessments (HRA) under the Conservation of Habitats and Species Regulations 2017. East Devon contains seven habitats sites of international importance, including the Exe Estuary SPA and East Devon Pebblebed Heaths SAC.

13.15. All plans and projects not directly connected with the conservation management of a habitats site require an HRA Screening to assess potential significant effects. If significant effects cannot be excluded, an Appropriate Assessment must be conducted, ~~consulting Natural England~~. Planning permission will only be granted if adverse effects

[99] ENV-005~~7~~ - Beer Quarry and Caves (SAC) Habitats Regulations Assessment (HRA) Guidance - https://eastdevon.gov.uk/planning/beer-quarry-and-caves-sac-guidance/

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on the site's integrity are ruled out or if there are imperative reasons of overriding public interest with adequate compensation.

~~**13.16.** Hedgerows, particularly in East Devon, are valuable biodiversity resources often threatened by development. Devon has the largest hedgerow network in England, with East Devon's hedgerows being particularly old and ecologically rich. Protecting and enhancing these features is crucial. The policy promotes the translocation of hedgerows over destruction, ensuring better quality and retention of ecological niches.~~

Commented [A147]: Paragraph not relevant to this part of the plan.

~~**13.17.**~~**13.16.** The South-East Devon European Sites Mitigation Strategy (SEDESMS) ensures that residential and non-residential developments within 10 km of the Exe Estuary or Pebblebed Heaths provide necessary mitigation. This includes on-site and off-site measures such as wardening, education, access changes, habitat improvements, and Suitable Alternative Natural Green Space (SANGS). SANGS must provide 8 hectares of open space per 1,000 new residents and be appealing to dog walkers.

~~**13.18.**~~**13.17.** To preserve the East Devon Pebblebeds Heath, new residential uses within 400 metres of the SPA are prohibited. Mitigation must be provided in perpetuity, with developer-led SANGS implemented before development occupancy. The council may use Compulsory Purchase Order powers to ensure land availability for SANGS. Monitoring will ensure mitigation keeps pace with development to protect the integrity of European sites.

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~~FIGURE 18~~FIGURE 16 Low tide on the Exe Estuary/the sea

~~13.19.~~13.18. **River Axe SAC:** The River Axe SAC is impacted by poor water quality due to increased phosphate levels. Proposals increasing phosphate levels require HRA, with mitigation secured in perpetuity. This includes new residential units and overnight accommodation. The River Axe HRA Mitigation Strategy will address these issues, following the mitigation hierarchy and a precautionary approach.

~~13.20.~~13.19. **Beer Quarry Caves SAC Pinch Points:** Semi-natural habitats between Seaton, Colyford, and Colyton are crucial for bat species from the Beer Quarry and Caves SAC. Development in these pinch points could severely impact bat movement and foraging. The Beer Quarry and Caves HRA guidance[100] provides specific requirements for developments in these zones.

~~13.21.~~13.20. **Vehicle Emissions Impacting Designated Sites:** Atmospheric nitrogen deposition affects the East Devon Pebblebed Heaths, leading to vegetation changes and adverse impacts on fauna. Development increasing

[100] ENV-005 - Beer Quarry and Caves (SAC) Habitats Regulation Assessment (HRA) Guidance, updated 2024: https://eastdevon.gov.uk/planning/beer-quarry-and-caves-sac-guidance/

traffic and emissions will not be permitted without mitigation[101]. Monitoring will ensure other designated sites, including the River Axe, are protected from similar impacts.

Biodiversity Net Gain

~~13.22.~~13.21. Biodiversity net gain is the principle that the net result (the end position) after development has occurred is that the biodiversity or wildlife value is greater ~~than that of any site that is being~~ than before the site was developed. The Government support biodiversity net gain and in East Devon we recognise the importance and are seeking to exceed minimum national levels.

~~Strategic~~ Policy PB05: Biodiversity Net Gain

Major development[102] proposals will need to deliver biodiversity net gain (BNG) of at least 20% to be calculated using the most up-to-date statutory metric. Where there is a demonstrable viability problem to achieve this target, it will be expected that all measures to exceed the national minimum requirements are made, and evidence for not achieving the 20% target is provided in full. Non-major developments will be required to secure at least 10% BNG.

All applications subject to biodiversity net gain will need to be supported by a Biodiversity Gain Statement which clearly demonstrates how the biodiversity gain hierarchy has been followed. The statement will need to be supported by a completed biodiversity metric (including condition assessment sheets) and demonstrate how BNG will be delivered in accordance with good practice principles for development[103],

[101] ENV-006 - Site Improvement Plan: East Devon Heaths (SIP070): ~~https://publications.naturalengland.org.uk/publication/6234004760035328~~ https://eastdevon.gov.uk/media/u1snlw3l/env-008-site-improvement-plan-east-devon-heaths-sip070.pdf

[102] ~~The Town and Country Planning (Development Management Procedure) (England) Order 2010~~NPPF : https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf~~https://www.legislation.gov.uk/uksi/2010/2184/article/13/made~~ (definition in Annex 2 – for housing 10 or more homes/0.5 hectares or more for other uses -additional floorspace of 1,000 SqM or more).

[103] ENV-022 - Biodiversity Net Gain: Good practice principles for development, 2016: https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf Or as may be superseded.

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BS 8683:2021104, and local guidance (or subsequently updated guidance). Any development proposal including significant onsite gains will need to include a Habitat Management and Monitoring Plan (HMMP) and be clear in terms of how habitats will be maintained, appropriately monitored, and reported for 30 years. The statement should provide the expected balance of any off-site gains and whether the use of statutory biodiversity credits is expected.

Where offsite habitats are created or enhanced to deliver BNG, in full or in part, the delivery should be provided within the locality of the impact and contribute to ecological networks and published strategies in accordance with BNG principles. Offsite habitat delivery should prioritise the recovery of ecological networks, priority habitats, and contribute to the aims and objectives of the Local Nature Recovery Strategy (LNRS), and other locally published plans, policies, and strategies including the Clyst Valley Regional Park, Tree, Hedge, and Woodland Strategy for East Devon, and the East Devon Nature Recovery Plan.

Where there is evidence of deliberate habitat degradation on development sites prior to the submission of planning applications, a precautionary view in terms of the habitat distinctiveness and condition will be assumed unless there is evidence to support a lower categorisation.

Developments exempt from mandatory BNG are required to deliver ecological enhancements consummate with the scale of development. Self-build developments will be required to provide a completed statutory biodiversity metric to evidence their baseline ecological value and the predicted ecological outcome of the development.

This policy does not apply in the Cranbrook Plan area.

Justification for policy

~~13.23.~~13.22. The Environment Act 2021[105] requires development proposals to achieve a minimum 10% BNG. This is crucial in addressing the ecological

[104] ENV-023 - BS BS8683:2021 Process for designing and implementing biodiversity net gain, ~~2021.~~ https://knowledge.bsigroup.com/products/process-for-designing-and-implementing-biodiversity-net-gain-specification?version=standard [accessed 14th Jan 2025]

[105] ENV-013 – Environment Act 2021, https://www.legislation.gov.uk/ukpga/2021/30/contents [accessed 14th Jan 2025]

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emergency, with wildlife populations declining globally and many species facing extinction. In the UK, habitat degradation and fragmentation are significant threats.

~~13.24.~~13.23. The Lawton Report (2010)[106] emphasi~~z~~sed the need for large-scale habitat restoration to create a resilient ecological network. BNG contributes to sustainable development, climate impact mitigation, and improved mental health and well-being.

~~13.25.~~13.24. East Devon has diverse but fragmented habitats. The council aims to enhance biodiversity by increasing habitat areas, improving quality, and connecting isolated habitats. The Nature Recovery Declaration (2023)[107] commits to exceeding the 10% BNG target, recogni~~z~~ing the link between biodiversity and climate crises.

~~13.26.~~13.25. Recent evidence suggests that a 10% BNG target without species management provides negligible gains. Therefore, the council applies the precautionary principle to ensure effective biodiversity gains. Increasing BNG to 20% is feasible and necessary for significant ecological benefits.

~~13.27.~~13.26. Habitat bank proposals in East Devon indicate the potential to deliver substantial biodiversity units. Significant growth in the district, including a new community, requires large open-space habitats to offset development impacts. BNG can be integrated with Suitable Alternative Natural Greenspace (SANG) and other mitigation measures.

~~13.28.~~13.27. BNG delivery opportunities also exist through nutrient neutrality and Landscape Recovery schemes. The 20% BNG policy will apply to major development proposals, ensuring meaningful biodiversity enhancements.

[106] ENV-024 – Making Space for Nature: A Review of England's Wildlife Sites and Ecological Network, https://eastdevon.gov.uk/media/hn4f1u4f/env-024-making-space-for-nature-a-review-of-england-s-wildlife-sites-and-ecological-network.pdf

[107] ENV-025 – Nature Recovery Declaration for East Devon, https://eastdevon.gov.uk/media/hn4f1u4f/env-024-making-space-for-nature-a-review-of-england-s-wildlife-sites-and-ecological-network.pdf

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Local Nature Recovery Strategy and Nature Recovery Network

~~13.29.~~13.28. Local nature recovery is the concept that environmental quality and biodiversity can be enhanced by improving areas for wildlife and creating green links between habitats ~~to allow wildlife value to be enhanced and increase~~. This policy supports proposals that enhance existing Nature Recovery Networks (NRNs) and features within them, expands NRN areas, and ~~increase~~ improvements in landscape-scale connectivity of ecological features.

Strategic Policy PB06: Local Nature Recovery Strategy and Nature Recovery Network

Proposals which result in enhancement of existing and any subsequentially defined NRNs and features that contribute to their importance, through habitat creation appropriate to network type, will be supported. Along with this, support will also be given for proposals leading to ~~expansion of existing features within NRN areas, and~~ increased landscape scale connectivity of NNRs and ecological features within them. ~~NRN areas will be supported.~~

Development proposals within NRN defined areas will be required to provide mitigation in the form of biodiversity improvements that are compatible with and lead to net improvements within or that are directly relevant to the NRN in which they fall.

Anywhere in East Devon, where or when there is off-site biodiversity net gain, or other off-site biodiversity contributions tied to planning permission for development, the expectation will be for these to be located inside, adjacent to or otherwise contribute to the overall NRN and its biodiversity importance, or to a specific NRN areas and its biodiversity importance.

Biodiversity net gain (BNG) relevant to ~~delivery within~~ NRN areas and their expansion and connectivity, ~~those meeting the aims and objectives of the East Devon Nature Recovery Plan, Clyst Valley Regional Park, and identified in Devon guidance are considered important for nature recovery within the district. BNG delivery in these areas~~ is ~~therefore~~ are formally identified as being ~~in an area~~ of strategic significance

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within the Statutory Biodiversity Metric Calculation Tool[108] ~~until the Local Nature Recovery Strategy (LNRS) is formally adopted. Once adopted, the LNRS will define high strategic significance used within the Statutory Biodiversity Metric Calculation Tool. NRN areas will still be considered important for nature recovery.~~

This policy applies in the Cranbrook Plan area.

Justification for policy

~~13.30.~~13.29. The Environment Act 2021 mandates a Local Nature Recovery Strategy (LNRS) for each area in England. Devon County Council is responsible for delivering the LNRS, with input from local authorities like East Devon District Council (EDDC). The LNRS includes biodiversity priorities and a local habitat map, forming the Nature Recovery Network (NRN)~~.~~[109]. The intent, in the summer of 2025, is that the statutory LNRS mapping will be published. East Devon District Council will produce additional mapping and guidance to complement and add additional detail to the Devon County Council mapping. Any subsequent guidance and mapping should be taken into account in delivery of biodiversity enhancement.

~~13.31.~~13.30. The LNRS and NRN aim to implement the Lawton Report's principles of creating "bigger, better, and more joined-up"[110] ecological networks. This involves improving, expanding, and connecting habitats to enhance ecological resilience and focus nature recovery efforts.

~~13.32.~~13.31. The LNRS outlines:

- Biodiversity descriptions of the strategy area.
- Opportunities for biodiversity recovery and enhancement.

[108] ENV-026 - How is Biodiversity Net Gain Measured? ~~2024:~~ https://eastdevon.gov.uk/planning/biodiversity-net-gain/how-is-biodiversity-net-gain-measured/

[109] The Devon County Council Nature Recovery Network can be viewed via: ENV-031 - Devon Nature Recovery Network Map,– https://www.devonlnp.org.uk/our-work/nature-recovery-network/nature-recovery-network-map [accessed 15th Jan 2025] ~~Devon Local Nature Partnership (devonlnp.org.uk) –~~

[110] ENV-024 – Making Space for Nature: A Review of England's Wildlife Sites and Ecological Network, https://eastdevon.gov.uk/media/hn4f1u4f/env-024-making-space-for-nature-a-review-of-england-s-wildlife-sites-and-ecological-network.pdf

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- Priority habitats and species for recovery.
- Measures to achieve these goals.

~~13.33.~~13.32. The NRN map (and any subsequent mapping) combines existing wildlife sites and extends habitats based on geology and soil conditions to identify focused areas for nature recovery. Key sites features in mapped NRN areas include SACs, SPAs, Ramsar sites, SSSIs, MCZs, NNRs, LNRs, County Wildlife Sites, special verges, ancient woodlands, and habitats of principal importance under the NERC Act 2006.

Design feature for wildlife enhancement

~~13.34.~~13.33. This policy promotes wildlife enhancement in new developments by requiring features that support biodiversity, such as bird and bat boxes, hedgehog-friendly fencing, and suitable nesting sites.

Policy PB07: Ecological enhancement and biodiversity in the built environment

In addition to features required as part of biodiversity net gain, mitigation or compensation, all proposals are required to incorporate features of biodiversity value tailored to the specific proposals, relevant local receptors and in accordance with best practice to maximise potential benefits.

As a minimum, the following features are required within new proposals:

A. Integrated bird boxes (e.g.~~,~~ swift bricks) in suitable locations at a ratio of one per dwelling, or a relevant number to be agreed ~~with EDDC~~ for flats or non-dwelling applications, to be provided in accordance with BS42021:2022[111]~~1~~;

B. Provision of integrated bat boxes in locations suitable for use by bats (i.e., adjacent to suitable habitats and not significantly ~~impacts~~ impacted on by artificial lighting);

[111] ENV-027 - BS 42021:2022 Integral nest boxes. Selection and installation for new developments. Specification. https://knowledge.bsigroup.com/products/integral-nest-boxes-selection-and-installation-for-new-developments-specification-1?version=standard [accessed 15th Jan 2025]

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C. An integrated bat loft within all major planning applications, if ecologically relevant (i.e., if the site is a suitable location for a bat loft to be constructed - not too isolated or within unsuitable habitat such as heavily urbanised well-lit areas);

D. Gaps (13 cm x 13 cm) in the bases of garden fences, (between gardens, and within fences between gardens and wider ecological networks, to facilitate movement of hedgehogs and other protected and notable species); and

E. Provision of overhanging eaves suitable for nesting house martins in all major development

The location and specification of biodiversity features should be designed with input from a qualified ecologist and informed by the most up to date research and guidance at the time of application. Bat and bird boxes should be integrated within the fabric of the building to ensure longevity and retention when ownership changes (i.e., to avoid removal by new owners).

This policy applies in the Cranbrook Plan area.

Justification for policy

13.35.13.34. Significant development growth in East Devon will increase pressure on the natural environment but also offers opportunities for nature recovery. This policy supports the biodiversity objective of the Environment Act 2021 and is crucial for the recovery of species like swifts, which are currently in decline.

13.36.13.35. Paragraph 185b of the NPPF[112] emphasizes enhancing ecological networks and recovering priority species. This policy aligns with these goals by requiring features that benefit priority species, such as birds, bats, reptiles, and hedgehogs, which can thrive in urban environments if provided with suitable habitats.

13.37.13.36. The BS42021:2021 guidance highlights the high occupancy rates of integrated bird boxes, endorsed by the RSPB and major housing developers. EDDC supports this guidance and promotes its use district-wide.

13.38.13.37. Ongoing research and guidance from organisations like the National House Building Council and the UK Green Building Council provide cost-

[112] National Planning Policy Framework, Dec 2023, para 185b: https://assets.publishing.service.gov.uk/media/669a25e9a3c2a28abb50d2b4/NPPF_December_2023.pdf

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effective measures for integrating biodiversity into the built environment. These measures require minimal maintenance and contribute significantly to nature recovery.

~~13.39.~~13.38. Additional features for wildlife enhancement:

- Reptile/amphibian hibernacula
- Brash and log piles
- Invertebrate bricks and bee hotels
- Water butts
- Wildlife ponds
- Sustainable urban drainage systems (e.g., swales and pools with native vegetation)
- Native hedge planting
- Swift/wildlife towers and green roofs
- Barn owl lofts
- Bat, bird, and dormouse boxes in trees and hedges

~~13.40.~~13.39. These features should be designed with input from qualified ecologists and integrated into the building fabric to ensure longevity and retention.

Trees in East Devon

~~13.41.~~13.40. Trees, woodlands, and hedges are vital for enhancing landscapes, providing wildlife habitats, supporting sustainable drainage, sequestering carbon, and improving public health.

Policy PB08: Tree, hedges and woodland on development sites

Retention of existing trees and hedges

Where trees are present on a ~~All~~ development site~~s~~ proposals will need to be designed, and schemes implemented, in a manner that retain good quality and healthy woodland, trees and hedgerows. This is to specifically~~,~~ include protection of ~~ing~~: ancient woodland; ancient and veteran trees; those with visual amenity value; those that support wildlife (such as some appropriate U category trees as part current BS

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5837[113]) or provide habitat connectivity; those which positively contribute to local landscape character, the historic environment or the significance of a heritage asset and its setting; and rare or unusual species of trees. These protected assets will need to be incorporated into the overall design and landscape scheme, within public spaces where possible.

Where justifiable and unavoidable tree and hedge losses occur, ~~these~~ there will need to be adequate~~ly~~ compensation~~ed~~ for on the development site or on publicly accessible land in accordance with the minimum compensation requirements for trees listed in the Table below. This replacement policy also applies to trees with Ash dieback (or any other future serious tree pest or disease) on development sites.

Tree protection on development sites

~~All development proposals where trees and native hedges are present, or where trees outside of the boundary are within the root protection zone of the development boundary,~~ All development proposals where trees over 75mm diameter at 1.5m and native hedges are present, or where trees outside of the boundary are within the root protection area or the crowns of which overhang the development boundary will need to be informed by British Standard BS 5837 Trees in relation to design, demolition and construction (or the most up to date version), the recommendations of which will be taken fully into account in the scheme design.

The planning application will be accompanied by a detailed appraisal of their condition, location, and ecological and landscape significance both at the time of the application and with an assessment of their potential future value. Applications should include an arboricultural method statement and tree protection plan to be followed during construction, reflecting the latest arboricultural standards for any tree works or development near to trees and demonstrating appropriate root protection areas.

Where woodland, trees and hedges are to be removed they should be accurately identified, with a clear justification set out for their loss, together with details of any mitigation or replacement planting as part of an overall approach to achieving biodiversity net gain. Development proposals that have not properly considered or

[113] ENV-028 - BS 5837:2012 Trees in relation to design, demolition and construction. Recommendations, ~~2012:~~ https://knowledge.bsigroup.com/products/trees-in-relation-to-design-demolition-and-construction-recommendations?version=standard&tab=history [accessed 14th Jan 2025]

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prioritised development options enabling the retention of woodlands, trees and hedgerows will be refused.

No building, hard surfacing, drainage or underground works will be permitted that does not accord with the principles of BS 5837 or Volume 4 National Joint Utilities Group (NJUG) Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees – Issue 2 (or the current revision or any replacement) unless, exceptionally, the Council is satisfied that such works can be accommodated without harm to the trees concerned or there are overriding reasons for development to proceed.

To avoid issues with subsidence all developments, including permitted development, will require appropriate depth of foundations considering local soil geology and water demand of nearby trees (and those proposed as part of an approved landscape planting scheme) at full maturity in accordance with current industry guidance.

Trunk diameter of tree lost to development (cm measured at 1.5 m above ground)~~Trunk diameter of tree lost to development (cm measured at 1.5 m)~~	Number of replacement trees[114]~~Number of replacement trees[115]~~
7 – 19.9~~7 – 19.9~~	1~~1~~
20 – 29.9~~20 – 29.9~~	2~~2~~
30 – 39.9~~30 – 39.9~~	3~~3~~
40 – 49.9~~40 – 49.9~~	4~~4~~
50 – 59.9~~50 – 59.9~~	5~~5~~
60 – 69.9~~60 – 69.9~~	6~~6~~
7~~80~~+~~80+~~	7~~7~~

Provision of new trees and hedgerows on development sites

[114] Based on the Bristol Tree Replacement Standard (BTRS) See: Supplementary planning documents and other planning guidance - Bristol Tree Replacement Standard: https://www.bristol.gov.uk/residents/planning-and-building-regulations/planning-policy-and-guidance/supplementary-planning-documents-practice-notes-and-other-planning-guidance

~~[115] Based on the Bristol Tree Replacement Standard (BTRS) See: Supplementary planning documents and other planning guidance - Bristol Tree Replacement Standard: https://www.bristol.gov.uk/residents/planning-and-building-regulations/planning-policy-and-guidance/supplementary-planning-documents-practice-notes-and-other-planning-guidance~~

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The provision of new trees and hedges shall be based on the principles outlined in the Devon Tree Strategy, the Tree, Hedge, and Woodland Strategy for East Devon, Devon County Right Tree Right Place Guidance, and New Devon Hedges and relevant guidance provided by Trees and Design Action Group (TDAG).

Tree planting design and maintenance should:

A. Take into account climate change and local landscape characteristics. Planting material should be sourced in accordance with the national strategy for biosecurity;

B. Allow sufficient space for existing and newly planted trees to grow to maturity, both above and below ground;

C. Ensure that any new streets are, where possible and it is commercially viable and it would not compromise other compelling design or operational highway considerations, tree-lined and residential areas and development sites as a whole will contribute towards 30% tree cover target for urban areas within the District.

D. Use large canopy tree species within new development as these provide the greatest benefits for increasing canopy cover, providing shade, intercepting rainfall and increasing biodiversity.

Within or adjacent to areas of paving where available soil volumes are likely to be restricted, technical solutions should be used to ensure that adequate soil volume and suitable growing conditions are provided, such as water infiltration, drainage and aeration, to enable new trees to establish and reach maturity as per industry best practice. These solutions must also prevent soil compaction and provide a load bearing capacity sufficient for the task for which the surface is designed for.

This policy applies in the Cranbrook Plan area.

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Policy PB09: Monitoring requirements for new planting schemes

Appropriate measures to ensure that new planting schemes are implemented in accordance with the approved details and to secure their long-term management and maintenance will be required including arrangements for monitoring. For major developments this will also require the placement of a financial bond by the developer prior to the commencement of construction, equal to 25% of the calculated planting cost for the scheme, or agreed phase, to be released on fulfilment of the following to the satisfaction of the planning authority:

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A. Within 1 month of the completion of planting works, the issue of a signed certificate by the developer's landscape architect or other appropriately qualified/ experienced professional consultant confirming that the planting works have been overseen by them and completed in accordance with the approved details.

B. For years 1-5 thereafter, the issue of an annual inspection report by the developer's landscape architect confirming that maintenance of the scheme has been caried out in accordance with the approved details and identifying any plant failures or other defects that require rectification together with a program for their implementation at the earliest opportunity. The annual certificate shall also confirm the satisfactory rectification of any defects identified during the previous year's inspection.

~~B.~~ This policy applies in the Cranbrook Plan area.

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Justification for policy

~~13.42.~~13.41. Trees, woodlands, and hedges are crucial green infrastructure assets that enhance landscapes, provide wildlife habitats, support sustainable drainage, sequester carbon, and improve public health. New developments must incorporate existing natural features early in the design process and include new plantings to create pleasant spaces and future mature trees. Protection and management during development are essential for their long-term health.

~~13.43.~~13.42. Planning applications must demonstrate how they meet policy requirements regarding trees, woodlands, and hedges. In cases of exceptional loss of ancient woodlands or veteran trees, compensation strategies such as planting new native woodlands or improving nearby habitats are required.

~~13.44.~~13.43. This policy supports the Tree, Hedge, and Woodland Strategy for East Devon[116], promoting the creation of new green spaces that benefit wildlife and public health.

[116] ENV-008 - EDDC Tree, Hedge and Woodland Strategy v1.4, https://eastdevon.gov.uk/media/b4dnabwy/env-008-tree-hedge-and-woodland-stratgy-v-1-4.pdf

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The Dorset and East Devon Jurassic Coast World Heritage Site

~~13.45.~~13.44. Most of the East Devon coastline is part of the Jurassic Coast World Heritage Site, recognised for its exceptional geological importance.

Policy PB10: Protection and enhancement of the Jurassic Coast World Heritage Site

Development within the Jurassic Coast World Heritage Site, or that could adversely impact on its setting, will only be permitted if it can be demonstrated that the Outstanding Universal Value of the coastline and specifically its geological importance, will not be adversely affected.

Development proposals that could give rise to adverse impacts, will be assessed in respect of:

A. The setting and importance of the world heritage site;

B. The inherent attributes and geological qualities of the site, specifically relating to its 'Outstanding Universal Value';

C. The grounds and reasons for its inscription; and

D. Its overall integrity (including possible incremental loss) and local impacts of development.

The international importance of the site and its setting is such that development proposals will be rigorously reviewed in determination of planning applications and this policy will sit alongside other affording coastal and countryside protection and enhancement.

This policy does not apply in the Cranbrook Plan area.

Justification for policy

~~13.46.~~13.45. The Jurassic Coast, inscribed as a World Heritage Site by UNESCO in 2001, is globally significant for its geology, fossils, and landforms. It is England's only natural World Heritage Site, extending from Orcombe Point at Exmouth to Old Harry Rocks near Swanage, Dorset.

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~~13.47.~~13.46. The Jurassic Coast Partnership Plan (2020-2025)[117] identifies the site's Outstanding Universal Value (OUV), including its stratigraphy, palaeontological record, geomorphological features, and ongoing scientific importance. The high rate of erosion is a key characteristic, maintaining dynamic rock exposures.

~~13.48.~~13.47. Development proposals within or impacting the site must demonstrate no adverse effects on its OUV. The policy ensures rigorous assessment of such proposals to protect the site's integrity and significance. The majority of the site falls within the East Devon National Landscape area, emphasizing its importance.

~~13.49.~~13.48. This policy aligns with the Jurassic Coast Partnership Plan, promoting geodiversity and public enjoyment of the site while safeguarding its geological heritage.

Sites designated for their geological importance

~~13.50.~~13.49. This policy protects nationally designated geological sites, such as Sites of Special Scientific Interest (SSSIs), from adverse impacts of development.

Policy PB11: Protection of designated geological sites

Proposals and plans that would cause a direct or indirect adverse effect upon nationally designated geological sites will not be permitted unless all of the following criteria are met:

A. They cannot be located on alternative sites that would cause less or no harm.

B. The public benefits of the proposal clearly outweigh the impacts on the features of the site and the wider network of natural habitats and designated sites.

C. Suitable avoidance, mitigation and compensation measures are proposed, in accordance with the mitigation hierarchy.

D. the integrity of the site is maintained.

[117] ENV-030 – Jurassic Coast Partnership Plan 2020-2025, https://eastdevon.gov.uk/media/qtnjkerd/env-029-jurassic-coast-partnership-plan-2020-2025.pdf

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~~D.~~ This policy does not apply in the Cranbrook Plan area.

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Justification for policy

~~13.51.~~13.50. Geological sites are designated for their scientific and educational value, often supporting wildlife interests. The underlying geology can determine the presence and value of wildlife species. Some sites are designated as SSSIs for both geological and wildlife value. This policy complements existing legislation and government guidance, detailing when adverse impacts may be permitted.

Regionally Important Geological and Geomorphological Sites

~~13.52.~~13.51. This policy protects Regionally Important Geological and Geomorphological Sites (RIGS) from adverse impacts of development, ensuring their scientific and educational value is maintained.

Policy PB12: Regionally Important Geological and Geomorphological Sites

The granting of planning permission for development or land-use changes that may have an adverse effect, either directly or indirectly, on Regionally Important Geological and Geomorphological Sites will only be permitted if the justification for the proposed development clearly outweighs any harm to the intrinsic scientific or educational value of the site.

Where development is permitted mitigation will be required to minimise the negative impacts and where this is not possible adequate compensatory enhancement or new site creation schemes will be required.

This policy applies in the Cranbrook Plan area.

Justification for policy

~~13.53.~~13.52. RIGS are important for their geological significance in Devon. Established by the Devon Regionally Important Geological and Geomorphological Sites Group, these sites are valuable educational, historical, and recreational resources. The selection criteria include educational use, scientific study, historical importance, and aesthetic value.

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~~13.54.~~13.53. RIGS often result from development processes, exposing geological features. Recognising these sites as County Geological Sites helps avoid activities that might damage their geological value. Development proposals should consider how to showcase geological features in an informative way.

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Open Space and Sports and Recreation



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Chapter 14. Open Space and Sports and Recreation

The importance of open space and sport and recreation facilities

14.1. Access to open spaces is crucial for mental and physical wellbeing. While East Devon has many high-quality open spaces, not everyone has easy access to them. This policy aims to align open space and recreation provision with new development and address current deficits.

Strategic Policy OS01: Access to open space and recreation facilities

Support will be given for the provision of new and enhanced high quality open spaces and access to existing spaces and to sports and recreation facilities.

A key consideration in accommodating new development will be to ensure that residents, visitors to or users of any new scheme must be able to access open spaces and sports facilities and enjoy the benefits that such spaces and facilities offer. Such an outcome will require that availability of space and safe and easy access to it for all. At the outset of designing any development proposal full account must be taken of the need for open space and sports facilities, including suitable access, changing provision, pavilions and other supporting facilities it will generate. H~~; h~~igh-quality provision must be designed in at the outset.

Qualitative (how good it is) and quantitative (how much there is of it) assessments of open space provision, in respect of what exists now and what is planned will be determining considerations in the decision-making process. Securing planning permission for development will require meeting and ideally exceeding minimum specified standards of provision.

This policy applies in the Cranbrook Plan area.

Commented [A149]: Text amended to clarify that its not just open space that is appropriate but also supporting facilities.

Justification for policy

14.2. Open spaces serve both informal activities, like walking, and formal sports. However, some areas, especially urban ones, lack sufficient facilities. The Council's Leisure

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Strategy (2022)[118] and the upcoming Playing Pitch Strategy (2025) will guide improvements and new provisions. The new ~~Playing Pitch~~P strategy will assess availability, access and use of pitches used for football, cricket, hockey, rugby and tennis.

14.3. Assessment of existing and planned open spaces will be key in decision-making, ensuring developments meet or exceed minimum standards. This policy helps protect existing facilities and supports the creation of new ones, enhancing public health and wellbeing.



~~FIGURE 19~~FIGURE 17 Playing pitch at Ottery St Mary

[118] HCO-001 East Devon District Council Leisure Strategy 2021-2031, ~~2022:~~ https://eastdevon.gov.uk/media/fvwb1cy5/east-devon-district-council-leisure-strategy-final-15-06-22.pdf

Quantified open space standards applicable for new development

14.4. New developments, especially housing, must have access to appropriate levels of open space or contribute to new provision to avoid shortfalls. This policy sets quantified open space standards based on Fields in Trust guidelines[119].

Policy OS02: Sport, recreation and open space provision in association with development

Planning permission for new housing development, ~~in line with the size thresholds set out below,~~ will be required to ~~make~~ provide open space ~~provision~~ in line with Fields in Trust derived standards ~~as tabled in this policy~~ and Natural England's Green Infrastructure and Accessible Greenspace Standards,

All major development proposals should include a clear open space strategy explaining how the provision for play responds to local need and provision, provides for all ages and is based on accessibility and an audit of current provision.

On sites over 200 homes developers will be expected to provide an audit of existing open space provision within 1.5km of the development and its capacity to justify inclusion in meeting site open space requirements.

Open space and play provision should accord with the requirements tabled below.

- ~~:9 dwellings or less will not be required to provide any specific open space typologies on site, however developers may choose to make such provision.~~

~~E. 10 – 49 dwellings will be required to provide (A) amenity open space on site as per the standards below.~~

~~F. 50 – 199 dwellings will be required to provide (A) amenity open space, and (B) children's and youth play space on site as per the standards below.~~

- ~~200 + dwellings will be required to provide for all open space typologies either on site or off site as per the standards below.~~Up to 20 homes should provide amenity green space suitable for informal play.

[119] HCO-0037 - Fields in Trust Guidance for Outdoor Sport and Play, https://fieldsintrust.org/content/images/FIT-Standards-2024-Accessible-version.pdf

Commented [A150]: Policy has been subject to reordering and refinement to give greater clarity over development needs and expectations. Also adjustment has been made to thresholds and standards to align with Filed in Trust standards, noting that there was some (non-evidenced) variations in the earlier draft.

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- Between 21 and 100 homes should provide on-site Local Areas of Play (LAPs) and amenity green space. On smaller sites in particular, amenity greenspace and designated play areas should be co-located to maximise recreational opportunities.
- Between 100 and 300 homes should provide on-site Local Areas of Play (LAPs), Local Equipped Areas of Play (LEAPs) and amenity green space.
- Between 300 and 500 homes should provide on-site Local Areas of Play (LAPs), Local Equipped Areas of Play (LEAPs), amenity green space and all other open space typologies as set out in the table below.
- On sites of more than 500 homes should provide all types of play spaces (LAP, LEAP, NEAP, and additional informal play provision (e.g. MUGA, Pump Track)) for all ages, .amenity green space and all other open space typologies as set out in the table below.

~~G.~~

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Open space type (defined in Field in Trust standards)	Quantity guideline (hectares per 1,000 population)	Maximum walking guideline distances from dwellings
(A) Amenity green space (including allotments)	0.60	480 metres
(B) Equipped ~~/~~designated play areas	0.25	100m - to LAPs, 400m to— LEAPs and 1,000m to—NEAPs
Parks and gardens	0.80	710 metres
Natural and semi natural green space	1.80	720 metres
Playing pitches	1.20	1,200 metres
Other outdoor pitch space	0.40	1,200 metres
~~Other outdoor~~ Informal play provision	0.30	700 metres

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Additional requirements for residential developments over 200 dwellings

Accounting for open space provision in accordance with the above ~~Counting in availability of existing and new provision set out in these standards,~~ and any additional

~~wider~~ existing accessible green space within 1.5 km of the site, all developments of 200 plus dwellings should also seek to ensure that there is or will be:

A. Doorstep Accessible Greenspace (defined as any formal/ informal publicly accessible open space) of at least 0.5ha within 200 metres (under 5 mins walk), or a

B. Local Accessible ~~Natural~~ Greenspace of at least 2ha within 300 metres (5 mins walk from home)

~~For~~ Additionally developments of over 300 dwellings ~~there~~ should~~be, or there should be provided~~ provide or have access to, a medium sized Neighbourhood Accessible ~~Natural~~ Greenspace of at least 10ha) within 1km (15 minutes' walk from home). For developments of over 1,000 dwellings this rises to 20 hectares of Accessible Greenspace within 2km.

Accessible ~~Natural~~ Greenspaces can contribute towards other functions such as Suitable Alternative Natural Greenspace (SANG) or Biodiversity Net Gain. New developer provided open space will typically be required on site, unless off-site provision is demonstrated to be of greater benefit.

~~New open space will be required unless existing available open space, measured from any proposed dwelling/s in the proposed scheme, and taken in combination with need generated by the proposed new development, exceeds standards for each typology.~~ ~~Existing~~ Open space will be ~~assessed~~ calculated on the basis of an average East Devon ~~population density~~ residential occupancy rate of 2.26 residents per household as derived from the 2021 census.

~~New development requirements will be based on assumed minimum occupancy rates as follows:~~

~~1 bedroom dwelling = 1.5 persons,~~

~~C. 2 to 4 bedroom dwelling = 2.26 persons,~~

~~D. 5+ bedroom dwelling = 2.5 persons.~~

~~Major developments for non-residential uses will need to make space provision of a level that is proportionate to needs arising from the development in question.~~

Open space provision will be required unless:

A. It is clearly demonstrated that the proposed housing development will provide for a different resident population level than the above or clearly differing needs, in which case moderation of standards may be appropriate; and/or

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B. The most meaningful contribution is generated by providing only certain types of space provision, this may be specifically relevant where need generated does not provide sufficient land to meet site size thresholds for a given use; and/or

C. Other substantive ~~typologies of or more~~ open space types are present, or will be provided, and they will provide an alternative better overall open space provision; and/or~~.~~

D. The site is within a town centre where space is limited, provided that the lack of on-site provision is compensated for by appropriate developer contribution towards new play facilities in the locality.

Open space requirements for non-residential use

Major developments for non-residential uses will need to make space provision of a level that is proportionate to needs arising from the development in question, such as the provision of adequate attractive outdoor sitting/ picnic area for staff on employment sites, and appropriate recreational space on larger sites.

~~C.~~ This policy applies to those parts of the Cranbrook Plan area that are NOT allocated for built development.

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Justification for policy

14.5. New developments, especially those increasing the population, create a need for additional facilities unless there is already a surplus. This policy requires new facilities to meet the needs generated by development, primarily housing but also other types that affect local populations, such as commercial projects. The Fields in Trust guidance provides positive design and development guidance that can be used to inform development proposals.

14.6. The policy aims to deliver new open spaces and enhance existing ones alongside residential development. Specialist accommodations, like those for the active elderly, will be assessed similarly, with adjustments for specific needs. Funds from this policy may be pooled to support public open space projects.

Location for new facility provision

14.7. This policy supports the provision of new and enhanced open spaces, sports facilities, and allotments within or near urban areas, ensuring they are accessible and compatible with neighbouring uses.

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Policy OS03: Location of facilities for sport and recreation~~, and~~ open ~~spaces and~~ ~~allotments~~

Within or adjoining urban or built-up areas, planning permission will be granted for new open space areas, ~~allotments,~~ sports facilities and parks and gardens or for the upgrading or enhancement of existing facilities provided that unacceptable adverse amenity or environmental impacts do not arise from development.

Any new or enhanced provision should be readily accessible to all people with a particular emphasis attached to ensuring safe pedestrian and cycle accessibility. Any built development associated with new facilities should be proportionate in scale or kind to the facilities that exist or are to be provided and where possible close by to existing built development.

This policy applies in the Cranbrook Plan area.

Commented [A151]: Separate policy on allotments is set out below.

Justification for policy

14.8. New sport and recreation facilities and open spaces can be built in their own right or ~~should typically~~ be accommodated within development sites, especially larger ones, and be integrated into detailed design proposals. They should be accessible to nearby residential populations and centres, avoiding adverse impacts. While new facilities are generally expected to be close to built-up areas, less formal open spaces can be more flexibly located with minimal adverse impacts.

New allotments and avoiding the loss of existing ones

14.9. This policy supports the creation of new allotments and protects existing ones, ensuring they are well-located and avoid adverse impacts.

Policy OS04: New allotments and avoiding the loss of existing ones

New allotments will be granted planning permission where they are well related to settlements and will avoid adverse environmental or amenity impacts.

Planning permission will not be granted for developments that would result in the loss of existing allotments unless at least one of the tests set out below is satisfied:

A. A development proposal will create a new provision that is equal to or better than that being lost: or

B. There is a demonstrable over-supply, and an over-supply that can be shown to persist in respect of past patterns and future projections of need, in the Parish/town in which the allotment is located.

This policy applies in the Cranbrook Plan area.

14.10. Allotments are valuable community assets, especially in urban areas ~~with small gardens~~. The council supports new allotments based on local needs. ~~Development proposals resulting in the loss of allotments must either provide equal or better replacements or demonstrate a persistent over-supply in the area.~~

14.11. Demand for allotments has increased, making them important for local communities. Loss of allotments is rare and only acceptable if a demonstrable over supply exists or provision is to be replaced with equal or better alternatives, considering factors ~~like~~ to include overall size, cost to users, accessibility, and quality of growing conditions.

Sport and recreation facilities in the countryside

14.12. This policy supports the provision of outdoor recreation facilities in the countryside and on the coast, ensuring they are appropriately scaled and located.

Policy OS05: Leisure and recreation developments in the countryside

Planning permission will be granted for outdoor recreation facilities in the countryside and on the coast provided that the nature of the activities undertaken or the space requirements of the proposal require a countryside or coastal location and all of the following tests are met:

A. The facilities or development proposals are in scale with the character, environmental characteristics and setting of the area and do not conflict with countryside, nature or landscape policies, nor detract from the amenities of the area.

~~B.~~

~~—~~The proposals provide for safe and convenient pedestrian and cycling access and discreet parking arrangements, particularly in environmentally sensitive areas.

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Commented [A152]: Matter addressed in policy so does not need replacing.

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~~C.~~ On site facilities are appropriate to meet the needs of the proposal and links with adjacent/nearby footpaths and bridleways are provided. ~~should be suited to any proposed site uses.~~

~~D.~~C. D. Development should not result in net adverse natural environmental impacts and ideally should generate improvements.

The clear policy expectation is that low impact uses only will be accommodated and such uses should be for countryside related activities.

Any building work should be small scale and subservient to wider site use and where possible existing building reuse rather than new development should take place. ~~,~~

Any new buildings and necessary extensions should be limited in scale and be in close proximity to existing groups of buildings or an existing settlement.

Where it is proposed to extend or intensify an existing use the proposals and any net cumulative additional impacts will be considered in the context of and be required to be compatible with all of the above.

This policy applies in the Cranbrook Plan area.

Justification for policy

14.13. The changing nature of agriculture and the need for rural diversification highlight the importance of outdoor recreation facilities in the countryside. These developments can improve despoiled environments, create wildlife habitats, and provide appealing destinations. However, they must be carefully managed to avoid significant visual impacts on the landscape.

14.14. Activities like horse riding are encouraged if they can be safely accommodated without harming the countryside. Dwellings in the open countryside are not justified based on recreational needs. This policy ensures that new facilities are in scale with their surroundings, provide safe access, and ideally generate environmental improvements. Any new buildings should be small-scale, reuse existing structures where possible, and be close to an existing settlement.

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Our Outstanding Historic Environment



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Chapter 15. Our Outstanding Historic Environment

15.1. A heritage asset, as defined by the NPPF, is any building, monument, site, place, area, or landscape with heritage interest significant enough to influence planning decisions. This includes both designated and locally identified assets.

15.2. East Devon boasts a rich heritage with distinctive architecture, including Scheduled Monuments, Listed Buildings, Conservation Areas, and more. These assets contribute to the district's unique character and include both man-made structures and natural landscapes shaped by human interaction.

15.3. National policy highlights the importance of conserving heritage assets for their contribution to quality of life. Local authorities must develop strategies for their conservation and enjoyment, focusing on assets at risk.

15.4. The East Devon Heritage Strategy (2024-2042)[120] guides policy implementation, detailing the district's heritage and setting objectives for its preservation. This strategy includes broader designations like National Landscapes, which enhance heritage management.

15.5. Non-designated heritage assets, identified by local authorities, also hold significant value and should be considered in planning decisions. These assets require balanced judgement regarding any potential harm or loss, ensuring their conservation aligns with their significance.

Historic environment

15.6. This policy ensures new developments consider the significance of heritage assets, promoting their conservation and viable use while enhancing local character and distinctiveness.

[120] HRD-004 – East Devon Heritage Strategy (2024-2042), *Link when published*

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Strategic Policy HE01: Historic environment

Proposals for new development that may affect heritage assets should take account of the desirability of sustaining and enhancing the significance of those assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.

Particular encouragement will be given to schemes that will help secure the long term conservation of at-risk, vacant and/or under-used buildings and bring them back into appropriate use.

Non-designated heritage assets, where identified through local or neighbourhood plan-making, the Local List[121], Conservation Area Appraisal or review or through the planning application process, will be recognised as heritage assets in accordance with national guidance and any local criteria. Development proposals that directly or indirectly affect the significance of a non-designated heritage asset will be determined with regard to the scale of any harm or loss and the significance of the asset.

Applicants will be required to describe, in line with best practice and relevant national guidance, the significance of any heritage assets affected including any contribution made by their setting. The level of detail should be proportionate to the asset's importance. In some circumstances a planning condition will require further survey, analysis and/or recording.

Alterations to historic buildings, for example to improve energy efficiency or reduce carbon emissions, should respect the integrity of the historic environment and the character and significance of the building.

This policy applies in the Cranbrook Plan area.

[121] HRD-005 – East Devon List of Local Heritage Assets (2023), https://eastdevon.gov.uk/media/zrrkvjm3/east-devon-list-of-local-heritage-assets-january-2023.pdf

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Justification for policy

15.7. Heritage assets, both designated and non-designated, are crucial to East Devon's character. These include Listed Buildings, Scheduled Monuments, Conservation Areas, and more. Most heritage assets lack statutory designation, relying on the planning system and positive management for conservation.

15.8. Applicants should use resources like the Devon Historic Environment Record and local Heritage Impact Assessments to understand the significance of affected heritage assets. Proposals should align with the Heritage Strategy and relevant guidance.

15.9. Further surveys and analysis may be required for some applications. Heritage Statements and Impact Assessments should follow best practice and national guidance, such as Historic England's advice notes.

15.10. The Council monitors at-risk heritage assets, seeking solutions through discussions with owners and using statutory powers if necessary. Collaboration with stakeholders and support for Neighbourhood Development Plans help protect and enhance the district's heritage.

Listed buildings

15.11. This policy ensures that any development affecting listed buildings conserves and enhances their heritage significance, respecting their architectural and historic features.

~~Strategic~~ Policy HE02: Listed buildings

Proposals for development, including change of use, that involve any alteration of, addition to or partial demolition of, a listed building or within the curtilage of, or affecting the setting of a listed building will be expected to:

A. Conserve, enhance or better reveal those elements which contribute to the heritage significance and/or its setting;

B. Respect any features of special architectural or historic interest, including, where relevant, the historic curtilage or context, such as burgage plots, or its value within a group and/or its setting, such as the importance of a street frontage or traditional shopfronts; and

C. Be sympathetic to the listed building and its setting in terms of its siting, size, scale, height, alignment, materials, building methods and finishes (including colour and

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texture), design and form, in order to retain the special interest that justifies its designation.

Development proposals affecting the significance of a listed building or its setting that will lead to substantial harm or total loss of significance will be refused unless, exceptionally, it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that demonstrably outweigh that harm or loss or where the applicant can demonstrate that:

A. The nature of the heritage asset prevents all reasonable uses of the site;

B. No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;

C. Conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

D. The harm or loss is outweighed by the benefit of bringing the site back into use.

Development proposals (including changes of use) that would result in less than substantial harm to the significance of a listed building or its setting will be expected to:

A. Minimise harm and avoid adverse impacts, and provide justification for any adverse impacts, harm or loss of significance;

B. Identify any demonstrable public benefits or exceptional circumstances in relation to the development proposed; and

C. Investigate and record changes or loss of fabric, features, objects or remains, both known and unknown, in a manner proportionate to the importance of the change or loss, and to make this information publicly accessible.

~~C.~~ This policy applies in the Cranbrook Plan area.

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Justification for policy

15.12. East Devon has around 4,600 listed buildings and structures, recognised for their national architectural or historic interest. Listing protects both the exterior and interior features, as well as any objects or structures within the curtilage that have been part of the land since before 1 July 1948. Occasionally, land distant from the building may also be considered part of its setting due to historical or functional associations.

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15.13. Listed buildings often have features that support roosting bats. Compliance with relevant legislation requires species survey information and ecological conditions for works likely to impact bats. This policy ensures that development proposals conserve and enhance the significance of listed buildings, respecting their special architectural and historic interest.

Conservation Areas

15.14. This policy ensures that development within or affecting Conservation Areas conserves or enhances their special interest, character, setting, and appearance.

~~Strategic~~ Policy HE03: Conservation Areas

Proposals for development within or affecting the setting of a Conservation Area must conserve or enhance its special interest, character, setting and appearance. Development will be expected to:

A. Contribute to the Conservation Area's special interest and its relationship within its setting. The special characteristics of the Conservation Area (such as existing walls, buildings, trees, hedges, burgage plots, traditional shopfronts and signs, farm groups, medieval townscapes, archaeological features, historic routes etc.) should be preserved;

B. Take into account important views within, into or out of the Conservation Area and show that these would be retained and unharmed;

C. Respect the local character and distinctiveness of the Conservation Area in terms of the development's: siting; size; scale; height; alignment; materials and finishes (including colour and texture); proportions; design; and form and should have regard to any relevant Conservation Area Character Appraisal;

D. Be sympathetic to the original curtilage of buildings and pattern of development that forms part of the historic interest of the Conservation Area;

E. Be sympathetic to important spaces such as paddocks, greens, gardens and other gaps or spaces between buildings which make a positive contribution to the pattern of development in the Conservation Area;

F. Ensure the wider social and environmental effects generated by the development are compatible with the existing character and appearance of the Conservation Area; ~~and/or~~

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G. Ensure no loss of, or harm to any building or feature that makes a positive contribution to the special interest, character or appearance of the Conservation Area.

Where a proposed development will lead to substantial harm to or total loss of significance of a Conservation Area, consent will only be granted where it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits that outweigh that harm or loss.

Where a development proposal will lead to less than substantial harm to the significance of a Conservation Area, this harm will be weighed against the public benefits of the proposal.

Wherever possible the sympathetic restoration and re-use of structures which make a positive contribution to the special interest, character or appearance of the Conservation Area will be encouraged to prevent harm through the cumulative loss of features which are an asset to the Conservation Area.

This policy applies in the Cranbrook Plan area.

Justification for policy

15.15. East Devon has 33 Conservation Areas, covering parts of main towns and historic cores of smaller settlements. These areas are designated for their special architectural or historic interest, which legislation seeks to preserve and enhance. Conservation Areas include groups of buildings, open spaces, trees, historic settlement patterns, and archaeological features. Development must preserve or enhance the character of these areas, considering important views, local character, and significant spaces.

Archaeology and Scheduled Monuments

15.16. This policy protects Scheduled Monuments and archaeological remains, ensuring development proposals consider their significance and setting.

~~Strategic~~ Policy HE04: Archaeology and Scheduled Monuments

Development must protect the site and setting of Scheduled Monuments, designated or undesignated archaeological remains, including ancient routeways and milestones.

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Applicants will be expected to undertake an assessment of appropriate detail to determine whether the development site is likely to contain archaeological remains. Proposals must show how the development proposals have had regard to any such remains.

Where the assessment indicates archaeological remains on site, and development could disturb or adversely affect archaeological remains and/or their setting, applicants will be expected to:

A. Submit an appropriate archaeological desk-based assessment; and/or

B. Undertake a field evaluation (conducted by a suitably qualified archaeological organisation), where necessary.

Nationally important archaeological remains (whether scheduled or demonstrably of equivalent significance) should be preserved in situ. Non-designated archaeological sites or deposits of significance equal to that of a nationally important monument will be assessed as though those sites or deposits are designated.

Where a proposed development will lead to substantial harm to or total loss of significance of such remains consent will only be permitted where it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

Where a development proposal will lead to less than substantial harm to the significance of such remains, this harm will be weighed against the public benefits of the proposal.

For other non-designated archaeological remains, the effect of a development proposal on the significance of the remains, either directly or indirectly, will be taken into account in determining the application.

In exceptional cases, where harm to or loss of significance to the asset is considered to be justified, the harm should be minimised, and mitigated by a programme of archaeological investigation, including excavation, recording and analysis. Planning permission may be granted conditional upon a programme of archaeological mitigation agreed with the Council that will be implemented by an appropriately qualified organisation. Unless otherwise agreed with the Council any development should not commence until the approved archaeological works have been satisfactorily completed. The results of the analysis of findings subsequent to the investigation

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should be published and made available to the relevant local and county authorities as well as being made publicly accessible.

This policy applies in the Cranbrook Plan area.

Justification for policy

15.17. East Devon has a significant archaeological heritage, with around 200 Scheduled Monuments legally protected under the Ancient Monuments and Archaeological Areas Act. The Devon Historic Environment Record[122] includes numerous other sites of local interest. Development proposals must assess and consider archaeological remains, preserving nationally important sites in situ. In exceptional cases, harm to or loss of significance must be minimised and mitigated through archaeological investigation and recording. The results should be made publicly accessible to enhance understanding and conservation of the district's archaeological heritage.

Historic Landscapes, Parks and Gardens

15.18. This policy ensures that development proposals conserve or enhance the special historic interest, character, or setting of parks and gardens on the Historic England Register.

~~Strategic~~ Policy HE05: Historic Landscapes, Parks and Gardens

Proposals should conserve or enhance the special historic interest, character or setting of a park or garden on the Historic England Register of Historic Parks and Gardens of Special Historic Interest in England.

Any harm to or loss of significance of any heritage asset requires clear and convincing justification. Substantial harm to or loss of these assets should be wholly exceptional in the case of Grade I and Grade II* Registered Historic Parks and Gardens and exceptional in the case of Grade II Registered Historic Parks and Gardens.

[122] ENV-017 - Devon Historic Environment Record, https://www.devon.gov.uk/historicenvironment/the-devon-historic-environment-record/ [accessed 14th Jan 2025]

Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, consent will only be granted where it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. All other options for their conservation or use must have been explored.

A balanced judgment, having regard to the scale of any harm or loss and the significance of the heritage asset, will be required in assessing proposals affecting non-designated historic parks and historic landscapes (including historic routes and battlefields).

Applicants will be required to describe, in line with best practice and relevant national guidance, the significance of any heritage assets affected including any contribution made by their setting. The level of detail should be proportionate to the asset's importance. In some circumstances planning conditions will require further survey, analysis and recording.

This policy applies in the Cranbrook Plan area.

Justification for policy

15.19. Historic landscapes, parks, and gardens are vital parts of East Devon's heritage, comprising open spaces, views, archaeological remains, and designed features like planting and water elements. These sites also hold green infrastructure and biodiversity value. Protecting and sympathetically managing these sites and their settings is essential.

15.20. The most significant sites are listed on the Historic England Register of Historic Parks and Gardens and the National Heritage List for England. Additionally, the district has several regionally or locally important sites that should be protected and enhanced where possible. Development proposals must justify any harm to these assets, ensuring substantial public benefits outweigh any loss. Non-designated sites require a balanced judgement based on their significance and the scale of harm or loss.

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Community Facilities

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Chapter 16. Community Facilities

16.1. Thriving communities are reliant on having spaces and buildings ~~to~~ where people can meet and for community-based activities to take place. Without such spaces many communities would not survive and would not provide the support mechanisms that are needed for the health and wellbeing of their residents. Such facilities also form an important resource that promotes social well-being and cohesion – they make space and place for great things to happen.

Policy CF01: New or extended community facilities

Encouragement will be given to the provision of new social and community facilities and extension of existing facilities.

Planning permission for new community spaces and buildings or extension to existing, to support (typically non-profit making) community events, gathering and activities, will be granted where all of the tests set out below are satisfied:

A. Provision will need to be within, adjoining or physically close to, and as such well related, to built-up parts or edges of a recognisable mass of buildings that reasonably constitutes a town, village or settlement (this test would be met in respect of new land allocations in the local plan for development).

B. Development will be designed to serve local residents. Facilities must be accessible to residents and within safe reasonable walking distance of most potential users of the facility. They will need to be proportionate in scale and size to the needs of that community.

Where possible development proposals must promote the sharing of spaces and facilities with a range of uses and activities typically expected in any development.

This policy applies in the Cranbrook Plan area.

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Justification for policy

16.2. Community facilities like halls, schools, libraries, health centres, and places of worship are vital for social activities. The Council supports expanding or creating new facilities, especially in areas with substantial new development or lacking existing facilities. Multi-purpose buildings accommodating various uses are encouraged.

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16.3. The Council also supports the temporary use of residential houses or other appropriate buildings for community activities in the following instances:

- Where there is a perceived demand that needs to be proven before constructing a permanent facility.
- Where a large development is proposed~~,~~ and a temporary space is needed to establish an embryonic community facility early in the construction process. These temporary uses can serve a 'meanwhile' function until a permanent solution is delivered.

16.4. This approach ensures that immediate community needs are met while planning for long-term, sustainable community facilities.

Loss of community facilities

16.5. This policy aims to prevent the loss of community facilities unless they are no longer needed or viable, or an equivalent replacement is provided.

Policy CF02: Loss of community facilities

Planning Permission will not be granted for developments that would result in the full or partial loss or closure of a community facility unless at least one of the tests set out below is met:

A. T~~t~~he community facility (in full or part) is no longer needed by the community or cannot be financially viably sustained or made to be viable. To meet this policy ~~test~~ planning applications that would result in a full or partial loss must be accompanied by both an:

~~A.~~1. Assessment, over a shorter and longer term, that demonstrates that a need no longer exists, and

~~B.~~2. A financial viability assessment and demonstration of active marketing that clearly shows that in current or alternative modified community use or different models of ownership, over a shorter and longer term, the facility cannot be sustained.

B. ~~an~~ An alternative facility is provided in a pedestrian accessible location to the local community (of equivalent or better accessibility as that to be lost) and is of equal or higher community value and is being provided as an explicit replacement for the lost facility.

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This policy applies in the Cranbrook Plan area.

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Justification for policy

16.6. Community facilities are essential, and their loss should be avoided unless they are clearly not needed, not used, or surplus to requirements. Proposals resulting in the loss of facilities must demonstrate a lack of need or viability through assessments and active marketing. Alternatively, an equivalent or better replacement facility must be provided in an accessible location. This policy ensures that community needs continue to be met and facilities remain available for public use.

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Implementation and Monitoring



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Chapter 17. Implementation and Monitoring

~~Infrastructure Provision~~

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~~17.1. Delivering infrastructure alongside housing and economic development is crucial for sustainable communities. This includes essential services like transport, flood risk measures, utilities, and habitat mitigation, as well as daily access to education, health, open spaces, and play areas.~~

~~17.2. Infrastructure funding can come from various sources:~~

- ~~**Direct Provision by Developments**: New developments must address their direct impacts by providing or funding necessary infrastructure.~~
- ~~**Planning Obligations (Section 106 Agreements)**: Legal agreements where developers contribute to infrastructure.~~
- ~~**Community Infrastructure Levy (CIL)**: A charge on new developments collected for future infrastructure projects.~~
- ~~**Government Grants or Loans**: Funding from national or local government.~~
- ~~**Utilities Companies and Central Government**: Funding from statutory organiszations and central government for specific projects like flood protection.~~

~~17.3. As the local plan progresses, detailed assessments of infrastructure needs and provision plans will be required.~~

Monitoring

~~17.4.~~ The Local Plan must be deliverable, not just aspirational. Each policy should outline intended outcomes and how success will be measured. To achieve this,

~~17.5.~~17.1. ~~Monitoring is essential for assessing policy success. T~~the council will monitor and publish~~produce~~ the following reports, fulfilling the need for ~~an~~an Annual Monitoring Report~~, which includes:~~.

Housing Monitoring Update (HMU): Tracks housing completions, projections, and land supply. This includes:

- Total net and gross completions by district, parish, settlement, and Built-up Area.
- Breakdown of completions on brownfield and greenfield sites.
- Affordable housing statistics.

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- ~~Housing projections and a~~
- ~~for the Local Plan period.~~
- Five Year Housing Land Supply calculations.
- Housing Delivery Test results.
- Designated Neighbourhood Area Housing Requirement Figures.

Employment Land Review (ELR): Assesses employment land availability and development. It identifies major employment sites and business parks, recording:

- Developed plots and building floorspace.
- Vacant or undeveloped plots suitable for future business development.
- ~~Analysis of Non-Domestic Rated (NDR) and vacant NDR units, including their uses and distribution.~~

Local Economic Review (LER): Provides core economic statistics from Census data, Office of National Statistics datasets, and other evidence. It includes:

- Wages and productivity.
- Unemployment and economic inactivity.
- Employee and job numbers.
- Demographics and wellbeing.

Self and Custom-Build Report: Details demand and supply for self-build plots, including numbers on the council's self-build register and plots granted planning permission.

Brownfield Land Register: Lists suitable brownfield sites for development. To be included, sites must be:

- Suitable for residential development according to Local Plan and NPPF policies.
- Free from adverse impacts on the natural environment, habitats, or built heritage.
- Viable and deliverable within 5 years.
- At least 0.25 hectares in size or capable of supporting five or more dwellings.
- Available for residential development without ownership or legal constraints.

~~17.6.~~ Additional monitoring areas include section 106/CIL contributions, heritage strategy, gypsy and traveller sites, neighbourhood plans, and planning appeals.

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~~Appendix 1 – Housing sites and commitments~~

17.2. ~~Insert data and table here.~~

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Appendix 1~~2~~ – Local Plan housing trajectory



Appendix 23 – Designated Neighbourhood Area Housing Requirement Figures Breakdown

DESIGNATED NEIGHBOURHOOD AREA	Local Plan Allocations	Adopted Cranbrook Plan Allocations	Neighbourhood Plan* Allocations (without planning permission)	Future Neighbourhood Plan Provision	Completions 01/04/2020 to 31/03/2024	Commitments 01/04/2020 to 31/03/2024	TOTAL DNA Minimum Housing Requirement Figure
All Saints	0	0	0	0	2	0	**2**
Axminster	1,086	0	0	0	212	111	**1,409**
Axmouth	0	0	0	0	1	3	**4**
Aylesbeare	0	0	0	0	2	6	**8**
Beer	0	0	0	0	6	38	**44**
Bishops Clyst (Sowton and Clyst St Mary) #	0	0	0	72	10	87	**169**
Broadclyst	214	90	44	0	1,001	1,033	**2,382**
Broadhembury	10	0	0	0	18	11	**39**
Budleigh Salterton	35	0	0	0	48	49	**132**
Chardstock	30	0	0	0	0	0	**30**
Clyst Honiton #	0	0	9	0	2	0	**11**
Clyst St. George	596	0	0	0	1	2	**599**
Colyton and Colyford	61	0	0	0	27	81	**169**
Cotleigh	0	0	0	0	0	0	**0**

Commented [A155]: Figures updated for the 2024 Monitoring Point and to reflect allocations at Reg 19 and included as a new appendix to the plan to aid interpretation and application of Strategic Policy SP03 Housing Requirement in Designated Neighbourhood Areas.

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Dalwood	0	0	0	0	0	2	**2**
Dunkeswell	43	0	0	0	5	24	**72**
East Budleigh with Bicton	22	0	0	0	3	5	**30**
Exmouth	1,305	0	0	0	483	523	**2,311**
Farringdon #	0	0	0	0	2	3	**5**
Feniton	102	0	0	0	16	9	**127**
Hawkchurch	12	0	0	0	3	2	**17**
Honiton	528	0	0	0	167	144	**839**
Kilmington	28	0	24	0	5	2	**59**
Luppitt	0	0	0	0	1	1	**2**
Lympstone	200	0	0	0	11	112	**323**
Membury	0	0	0	0	2	2	**4**
Monkton	0	0	0	0	1	0	**1**
Newton Poppleford and Harpford	55	0	0	0	10	11	**76**
Otterton	10	0	0	0	15	2	**27**
Ottery St. Mary (including Tipton St John)	323	0	5	0	107	48	**483**
Payhembury	15	0	0	0	7	16	**38**
Plymtree	30	0	0	0	3	9	**42**
Rockbeare	0	780	0	0	14	12	**806**
Seaton	284	0	0	0	71	168	**523**
Sidmouth (including Sidford and Sidbury)	215	0	0	0	71	185	**471**
Stockland	0	0	0	0	1	2	**3**
Uplyme	0	0	19	0	13	12	**44**

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Upottery	0	0	0	0	1	2	**3**
West Hill	64	0	0	0	4	2	**70**
Whimple	83	500	0	0	14	14	**611**
Woodbury (including Exton)	311	0	0	0	19	35	**365**
Yarcombe	0	0	0	0	1	5	**6**
~~**TOTAL MIN. HOUSING REQUIREMENT DNAs**~~	~~5,662~~	~~1,370~~	~~101~~	~~72~~	~~2,380~~	~~2,773~~	~~**12,358**~~

Notes:

Figures for projected dwellings associated with the second new community allocation are not included as this information is not yet available.

~~*Neighbourhood Plan Allocation refers to sites allocated in a 'Made' or 'Recommended for Referendum' Neighbourhood Plan (as at end December 2025), and where not completed or consented (committed))~~

Local Plan Allocations relates to sites/policy in this ~~February 2025~~ Regulation 19 Publication Version of the East Devon Local Plan (2020 to 2042).

Cranbrook Plan Allocations comprise the four Expansion Areas in Policies CB2 to CB5 of the adopted Cranbrook Development Plan Document (2013 to 2031).

*Neighbourhood Plan Allocation refers to sites allocated in a 'Made' or 'Recommended for Referendum' Neighbourhood Plan (as at end December 2025), and where not completed or consented (committed)).

Future Neighbourhood Plan Provision describes agreed dwelling totals to be brought forward in upcoming neighbourhood plans.

Dwellings completed on sites before 01/04/2020 are not included in the figures as they fall outside the Plan Period.

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Dwelling completions or commitments (with planning permission) are included in the figures up to the 2024 Monitoring Point (31/03/24).

Further information on the methodology for calculating the housing requirement and more detail on the figures~~ed tables~~ for each DNA can be found

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Report to: Strategic Planning Committee

Date of Meeting: 4 February 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

Exeter local plan – Regulation 19 consultation – Proposed response from East Devon District Council

Report summary:

The Exeter Local Plan has reached the Regulation 19 stage of public consultation. The closing date for comments is 6 February 2025. This report sets out summary information about the plan contents and provides a suggested response to the consultation from this council that raises objection to their plan in respect of failing to provide sufficient and appropriate levels of employment land and how the plan seeks to address delivery of infrastructure to serve sites north of Topsham.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

That Strategic Planning Committee, whilst welcoming the Exeter plan and noting the general high quality of content, raise objection, as set out in this committee report, to fail to make available sufficient land for employment provision and secure delivery of the proposed Topsham Infrastructure Delivery Framework.

Reason for recommendation:

To ensure the Council has opportunity to express its views in respect of provision of employment land, and any other matters, as set out in the consultation on the Exeter local plan.

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

Portfolio(s) (check which apply):

☒ Climate Action and Emergency Response
☒ Coast, Country and Environment
☐ Council and Corporate Co-ordination
☐ Democracy, Transparency and Communications
☐ Economy and Assets
☐ Finance

☒ Strategic Planning
☒ Sustainable Homes and Communities
☒ Tourism, Sports, Leisure and Culture

Equalities impact Low Impact

Climate change Low Impact

Risk: Low Risk;

Links to background information

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

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1. Introduction

1.1 The Exeter City Council local plan (titled - The Exeter Plan) is now at the Regulation 19 stage of consultation - see exeter-plan-publication-plan-regulation-19.pdf. Consultation closes on 6 February 2025 by which date all comments must be received. Any comments agreed by this committee will need to be submitted, therefore, within two days of this committee meeting.

1.2 The opening paragraphs of the Exeter Plan succinctly and clearly set out its role:

"1.1 The Exeter Plan will shape the future of Exeter for the next twenty years up to 2041 and will be the basis for how the city continues to evolve and meet the needs of the community.

1.2 The Exeter Plan is the Local Plan for Exeter. It will be the main planning policy document for the city, setting out where development should take place and providing the policies which will be used in making decisions on planning applications. ....."

1.3 The Exeter plan, by starting the Regulation 19 stage of consultation before Christmas is now running marginally ahead of the East Devon Local Plan. Whilst, on a general level, it is a very good plan the officer recommendation there are concerns about the inadequate provision of employment land in the plan.

2 Format and approach in the Exeter plan

2.1 The Exeter Plan is a comprehensive local plan covering all matters that fall to the City Council in respect of their responsibilities in determining planning applications within the city boundary. The plan is well written, coherent and sets out a positive

agenda and vision for development of and within the city and it sets this within a wider perspective of city council corporate objectives.

2.2 In structural terms the city plan is quite conventional in respect of ordering and in respect of subjects and policy matters, much as the East Devon Local Plan is. It has broad chapter headings, such as 'Climate change', 'Homes' and 'Economy and jobs' with subject relevant plan policies falling under these.

2.3 Being an immediate neighbour of East Devon there are very clear interactions between the city and its plan and East Devon and our plan. There has been ongoing work and dialogue with the city council officers as their plan has progressed and more critically we share many evidence documents and joint working approaches with the City Council, and in this respect also with Teignbridge District Council and Mid Devon District Council, which form Exeter's other neighbouring local authorities (the latter does not actually abut the city but is very close).

2.4 By way of context setting the Teignbridge Local Plan is currently at Examination and oral hearing sessions have concluded. Teignbridge council have received positive written feedback from their planning inspectors (they have two rather than one - this is now quite common) and subject to some work on specific points raised, and consultation on main modifications, they are likely to be adopting their plan in the months ahead. Mid Devon District Council have a quite recently adopted local plan and the Council are not as far advanced as us and Exeter in new plan production (given proposals for creation of a new unitary authority or authorities it is not known if they will proceed with new a plan as a District Council).

2.5 The city has relatively tightly constrained boundaries and is a dynamic area and attractive location in which to live and work. This invariably places pressure for growth beyond city boundaries. Land on the western side of East Devon, in particular, has seen significant 21st century development that in part has resulted from and is related to wider Exeter sub-regional pressure and demand for development. The pressures on East Devon are greater than those on neighbouring Teignbridge and Mid Devon. The city also forms a focal point for many higher-level services and facilities, such as many jobs, a major hospital, professional sporting venues, large city shops and recreation facilities. This invariably leads to the flow of people, traffic and public transport across and into the city from adjoining areas. Such cross-boundary considerations, amongst other matters, illustrate the issue of inter-connectivity and major associated considerations that specifically include transportation matters and movements of people and goods. They also work the other way with some city residents commuting out to work and, amongst other matters, many enjoy the coastline and stunning environments found in East Devon and elsewhere beyond city boundaries.

3 A concentration on brown field development and urban regeneration

3.1 Although Exeter is a comparatively prosperous city, and is not awash with brown field land, there is quite an emphasis on urban regeneration in the city plan with an onus on the reuse of previously developed land and more intensive use of sites that are currently in use, but which may be seen as being under-used.

3.2 The city plan sets out mixed use regeneration proposals, in particular, for a number of larger scale redevelopment proposals, some explicitly set out in policy and others (such as for parts of Marsh Barton) more aspirational and of possible potential for the longer term. In respect of Marsh Barton it is relevant to note that in earlier iterations of the plan there was a greater policy expectation for regeneration and new development, in part this may have resulted in loss or displacement of some business and jobs. But the plan is now less explicit on this happening and puts any such works into the longer term.

4 Housing development

4.1 The plan advises of accommodating delivery of 13,975 homes across the life of the plan, 2021 to 2041, this averages out at 699 homes per year. The new December 2024 Standard Method housing number for Exeter is 800 new homes per year, but as with East Devon, the plan is progressing under transitional arrangements ahead of a new plan making regime being introduced. Their plan, therefore, can progress on the basis of providing (at least) 80% of the 800 number which generates a figure of at least 640. The Exeter plan is therefore planning to accommodate a level of housing provision that exceeds a calculated need with a healthy 9.18% 'headroom' figure. This headroom is appropriate as it gives flexibility around possible non-delivery of some provision against need. The city plan meeting full city housing needs is to be welcomed.

5 Employment land provision

5.1 The city plan (see para 7.1 onward) does not talk about an Exeter specific employment land requirement and how the Exeter Plan addresses this quantified need. More precisely the Exeter Plan fails to state that it will meet an Exeter quantified need and given this failure (noting potential impacts on East Devon) the recommendation to committee is that our council raise objection to the plan. See boxed text further on in this section of this report.

5.2 What the Exeter Plan does do (para 7.3 onward) is present the city as part of a wider 'Functional Economic Market Area' and talks about land supply across this wider area (the local authorities of Exeter, East Devon, Teignbridge and Mid Devon) and how there is a collective need, across local authority areas, and how collectively this need will be met.

5.3 Notwithstanding the collective need/supply position set out in the Exeter local plan the City Council were part of a partnership (made up of city and East Devon, Teignbridge and Mid Devon District Councils) that commissioned consultants Hardisty Jones to produce an Economic Development Needs Assessment (EDNA). This report had local authority area specific data within it. On the city council web site see - Microsoft Word - Greater Exeter EDNA HJA Final Report v2.1.docx

5.4 The Hardisty Jones work, for each authority, sets out a range of alternative growth scenarios, but using a mid/higher level growth position (under what is termed the 'Clean Growth' scenario) it sets out in Appendix 2 (para 10.2.2 onward) and specifically Figures 10.9 and 10.10 land requirement for 2020 to 2040 for the city of:

- 10 to 26 hectares for offices (see Figure 10.9); and

- 46 to 53 hectares for industrial (see Figure 10.10).

5.5 Taking the mid-point for each of the above gives a total requirement figure of around 68 hectares. In their local plan the City Council are allocating 3 sites for 'transformational' employment uses, totalling 15.5 hectares. Additional provision (an unspecified amount) is to be provided through windfalls, and on the mixed-use brownfield sites and, potentially, on the existing service station site, if a better alternative can be provided outside Exeter. However, the mixed-use brownfield sites are intended to be predominantly residential and so the employment land provision will be limited and given that these sites include parts of Marsh Barton that are currently in employment use there is potentially a significant net loss of employment spaces on this site. Based on previous work it seems unlikely that a suitable service station site outside the city will be found.

5.6 We have not been able to find precise data and information to undertake a full breakdown of quantified projected employment land supply in the city but the above supply sources, compared against EDNA need, indicates a substantive shortfall in employment land provision.

5.7 It is highlighted that on the same comparative basis Teignbridge, through their local plan, are making land provision that is a little above their reported EDNA need, 65 hectares against a need of 62 hectares. Comparative supply data for Mid Devon, as the Council is not as far advanced in plan making is not available, but the EDNA shows a need (calculated on the same basis) for around 51 hectares. For East Devon our new local plan makes provision that is some way in excess of EDNA generated need requirements, 80 hectares of need with provision from all sources calculated at 178 hectares. This takes account of past under provision of employment land, current unmet demand and the need to ensure that the new community is a sustainable and self-contained town with minimal out-commuting. The proposed sites in excess of the EDNA requirement for East Devon is not intended to meet unmet requirements in Exeter and the city council has not sought provision in East Devon under the duty to co-operate to address any shortfall within the city.

5.8 Across the four authorities, taken as a whole, there is therefore a collective land supply (notwithstanding some lack of full clarity over numbers) that exceeds quantified need and this is the case that the city set out in their local plan. However, assuming committee are not content that a cross-boundary collective need and supply approach is appropriate there is a strong basis that could be used to raise objection to the Exeter plan.

5.9 Assuming objection is deemed appropriate then the proposed objection wording as set out in the boxed text below is highlighted.

Proposed objection wording

Employment Land Provision

East Devon District Council object to chapter 7, Economy and Jobs, of the Exeter local plan as it fails to allocate or otherwise make sufficient land available to accommodate future employment needs of the city. The City Council should respond to the evidence set out in the Greater Exeter Economic Development Needs Assessment - Microsoft Word - Greater Exeter EDNA HJA Final Report v2.1.docx (on the City Council website) and plan to meet quantified employment land needs, in the city, as set out in Appendix 2 of this report - a mid-point on the Clean Growth need scenario being an appropriate level to plan for.

From assessment of available data, noting full quantified data on all sources of supply is not specifically summarised, the Exeter Plan falls (appears to fall) a significant way short of meeting city needs. The proposed regeneration opportunity area also has significant potential to lead to a net loss of employment spaces in this part of the city. Whilst noting that the plan does reference a collective across local authority balance (in the Exeter Functional Economic Market Area) between employment land need and supply it is not considered that such an approach to need/provision is an appropriate means to plan for defined city generated needs.

The approach adopted by the City Council, in not planning to meet city needs, generates the following failings:

a) The plan will not be meeting the needs of the city.

b) Lack of provision will undermine the economic growth potential of the city and the stimulus it provides for the wider area. Failure to provide undermines future economic success.

c) Failure to make sufficient provision will lead to pressure to accommodate city generated growth to locations outside of the city boundary. Amongst other matters this will lead to greater outward commuting and pressure on transport infrastructure.

The City Council's approach appears to rely on employment land provision outside of the city boundary but within the wider Functional Economic Market Area in order to meet the economic needs of the area. However, no request has been made under the duty to co-operate for East Devon District Council to assist in meeting the employment land needs identified by the EDNA. The land identified in the emerging East Devon Local Plan 2020 – 2042 is considered to be necessary to meet the needs of East Devon and does not seek to address wider needs.

Suggested modifications to the plan

To overcome and address the concerns raised by East Devon District Council the Exeter Plan should explicitly quantify, citing appropriate evidence, city employment land needs and also all sources of supply, specifically including land allocations in the plan. Any shortfalls in land provision arising between this supply and need

assessment should be addressed through additional provision, specifically land allocations for development, in the Exeter plan. This would draw the plan into alignment with tests set out in national planning policy.

To achieve the outcome the city council may need to identify additional land to allocate, review or amend allocations of land for other uses or in other ways adjust plan policy. It is appreciated that this may involve some challenging decisions, for example in respect of building on green fields sites. It is noted, however, that there are not the national landscape designations in the city that fall on land outside of city boundaries.

5.10 If we make this (or a variation on this) objection, the city council could choose to do a redrafted plan and reconsult (this applies to any representation they may receive). Far more likely, however, is that they will submit the plan for examination as drafted and this objection and all others would be submitted with the plan.

5.11 At submission a planning inspector will consider objections made and if felt to raise matters of significant enough relevance, specifically around matters of compliance with legal requirements or plan soundness, the plan inspector will seek views from the city council on the approach taken, whilst also allowing for anyone making objection to elaborate on the matters they raise.

5.12 Without pre-empting a possible city council response it would appear quite likely (if not very probable) that they would present a case to their inspector that their approach is reasonable, appropriate and sound. The city council will have drafted their plan in the knowledge of the employment supply and need numbers and would have applied a cross-boundary position by clear intent and design. They will have also done so on their understanding of land availability and their critique of suitability for development. This is not to say that they are either right or wrong, but it is reasonable to assume it will be part of their case.

5.13 Furthermore, the executive summary to the EDNA states *"East Devon should also consider how to accommodate some of the forecast future demand driven by the economy of the City of Exeter, which may require further site allocations."*

5.14 In conclusions the EDNA also states that *"... economic and employment growth generated by the City of Exeter cannot be met within its own boundaries, so sites in East Devon should help to meet this growth potential.* And also it advises *"The City of Exeter has significant economic and employment growth potential, but it cannot all be accommodated within the city, given the constrained supply of employment land, and little scope for new potential employment sites. The Liveable Exeter initiative also seeks to redevelop some employment areas for mixed-use residential and employment uses. Some of the future economic growth stimulated by the City of Exeter will need to be accommodated in its hinterland in adjoining local authority areas, which is functionally part of the city. Future employment growth in areas adjoining the City of Exeter (the city fringe) could reduce levels of commuting into Exeter itself."*

5.15 It needs to be stressed that the EDNA does not write or establish plan policy, that is for the local planning authorities to do, but it does express the authors opinions on matters.

5.16 If we don't object (or the plan is not changed, for example an inspector agrees with the City Council) the result is likely to be more pressure for employment development in East Devon. Noting that we may, in some respects, be happy to accommodate at least some of it. There may be positive financial income reasons for doing so and, especially if high quality jobs are secured, some additional kudos in accommodating those jobs and the potential and opportunities they may offer for East Devon residents.

5.17 It is not suggested that there are other matters in the city plan that East Devon District Council would wish to object to, though we touch on some further points of interest below.

6 Motorway service

6.1 In policy STC8 the city council set out that should the existing motorway service station be relocated then it could free up the use of the land for a new employment use. Whilst possible motorway service station relocation has been discussed for some time there are no agreed proposals for this to happen and no authority (that specifically includes East Devon District Council) has allocated land for this to happen. Furthermore relocation and implementation from a technical highway perspective would be very challenging and expensive and also there would be complex legal matters to address and overcome.

6.2 It would be reasonable to progress on the basis that relocation will not happen, despite some possible potential benefits, for at least the foreseeable future.

7 Joint infrastructure matters and planning

7.1 Whilst we do not set out any details here the successful implementation of the Exeter plan, as well as ours, and those of other neighbours, will depend on joint working and collaboration and coordination of efforts and some expenditure. There are some initiatives we, and the city, are promoting with direct cross boundary relationships, for example our proposed allocation of land north of Topsham for development. There are many cases, as well where we will need to take coordinated infrastructure delivery approaches. Specifically, these will include in respect of transportation and highway matters.

7.2 Members will recall that when considering the allocations of sites north of Topsham and accessed off Clyst Road, consideration was given to the relationship with 4 sites being allocated in the Exeter Local Plan and nearby sites already consented by Exeter. It was felt that the sites on both sides of the administrative boundary should come forward in a co-ordinated way to ensure that infrastructure is delivered in a co-ordinated way. The Exeter Plan includes reference at Policy TI1 to production of an Infrastructure Delivery Framework to address this but does not go as far as requiring a joint masterplan for the sites. More fundamentally it does not

seek to control the delivery of the sites and ensure that they come forward only in accordance with the agreed Infrastructure Delivery Framework and so there would be nothing to prevent them coming forward ahead of this work being completed or subsequently without complying with it. The consequence of this is that the opportunity to deliver necessary infrastructure on the sites would be lost and the opportunity to secure Section 106 contributions towards the delivery of infrastructure identified through this work would also be lost.

7.3 This issue could easily be overcome through some additional wording to the policy, however at the Regulation 19 stage of plan production consultation is essentially on behalf of the inspector and so to ensure that this issue is given due consideration and can be heard at the examination of the plan, if necessary, it would be appropriate to formally object with the following wording suggested:

Proposed objection wording

Policy TI1 – Topsham Infrastructure Delivery Framework

The co-ordinated approach to the delivery of infrastructure on sites north of Topsham within the city and within East Devon District under Policy TI1 is welcomed, however the wording of this policy does not prevent the development of the allocated sites within the city from coming forward ahead of production of the envisaged Infrastructure Delivery Framework or require them to only come forward in accordance with an agreed framework.

Suggested modifications to the plan

To address this concern the City Council should add the following wording (or similar) to Policy TI1:

"Development of allocation sites ref: 90, 91, 94, 153, shall only be permitted where in accordance with the formally agreed Infrastructure Delivery Framework".

If the City Council is in agreement then wording could be agreed through a statement of common ground and this change recommended to the examination.

Financial implications:

There are no direct financial implications identified in this report.

Legal implications:

There are no direct legal implications identified in this report (002533/4 February 2025/DH).

Report to: Strategic Planning Committee

Date of Meeting: 4 February 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

Self-build and custom housebuilding update and monitoring report for 2023-2024

Report summary:

Custom and self-build (CSB) monitoring figures were last considered by the SPC on 30th April 2024. That report set out the legal and national policy changes that came into effect at the end of 2023/start of 2024 and noted that changes may be required to how the supply of CSB plots was undertaken. The report explained that secondary legislation to make the situation clearer was expected later in 2024: that legislation has yet to be published.

To take account of the new primary legislation and up-to-date guidance, the way that the CSB supply has been 'counted' in the latest monitoring period has changed so that plots have only been included if they show evidence of being a CSB project (where the owner has the primary input into the house design).

The monitoring report shows that we are meeting our minimum legal requirements in relation to the supply of plots to meet the demand shown on our CSB register. However, the supply of just 15 plots in the 2023 to 2024 monitoring period is the lowest since the introduction of the duty to meet CSB demand and continues the downward trend noted in last year's report. This, coupled with the very supportive national policy for CSB, suggest that we need to do more to deliver CSB opportunities.

One of the resolutions of SPC last time this issue was reported was to consider including a planning policy in the emerging local plan to enable greater levels of self-build and custom housebuilding through small and medium sized sites. No additional policies on CSB have been included in the Regulation 19 plan, although the more 'relaxed' settlement boundaries should provide additional CSB opportunities on smaller sites. Additionally, Policy HN05 requires 5% of sites for 20 or more dwellings to be delivered as CSB plots.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

That Strategic Planning Committee:

1) Endorse the draft monitoring report for use in planning decisions (both planning policy and development management) and agree its publication on the Council's website.
2) Note that during the latest monitoring period (31/10/23 to 30/10/24) 11 individuals were added to the self-build register (8 to part 1 and 3 to part 2) generating a need to permission 8 plots suitable for self-build between 31/10/24 and 30/10/27.
3) Note that the demand for self-build plots indicated on the register should be taken into account in our planning, housing, regeneration and estate functions.

Reason for recommendation:

To ensure that our obligations with regard to self-build and custom housebuilding are met in line with the relevant legislation and national planning policy context.

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

Portfolio(s) (check which apply)**:**
☐ Climate Action and Emergency Response
☐ Coast, Country and Environment
☐ Council and Corporate Co-ordination
☐ Democracy, Transparency and Communications
☐ Economy and Assets
☐ Finance
☒ Strategic Planning
☒ Sustainable Homes and Communities
☐ Tourism, Sports, Leisure and Culture

Equalities impact Low Impact

Climate change Low Impact

Risk: Low Risk; Low

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 Background to the self-build register

1.1 The Government is keen to encourage opportunities for people to build their own homes through custom and self-build (CSB). Some of the advantages of CSB are that it

diversifies the supply of housing, gives individuals and groups the opportunity to tailor make their own home, can be cheaper than buying a 'standard' home from a house builder and can produce innovative designs with enhanced ecological credentials.

1.2 Since March 2016 we have kept a register of people who are interested in building their own home in East Devon. Since October 2017 we have had a duty to ensure that enough serviced plots are 'permissioned' to meet the demand shown on the register. We have produced CSB monitoring reports annually to show the latest demand and supply figures. There is a legal duty to consider the results in our planning, housing, regeneration and estate functions.

1.3 In April 2017 we introduced a local connection test so that, generally, only those who live or work in East Devon, are included on the part of the register that is used to gauge demand for the number of plots that need to be permissioned (Part 1). In February 2020 this Committee decided to keep the local connection test and not to introduce a financial solvency test or a registration fee. It is not considered that circumstances have changed that would justify reconsideration of these issues.

1.4 In addition to being relevant to developing plans and policies, Government Guidance states that the self-build register is likely to be a material consideration in planning applications. The guidance also says it should be taken into account in housing decisions, including preparing local housing strategies, delivering affordable housing, supporting community-led housing and building housing on land owned by the local housing authority. The register should also be used to inform disposal of Council owned land and when preparing redevelopment plans.

1.5 Over the years our approach to determining which permissions were 'suitable' for CSB (and should therefore be counted towards the supply needed to meet the demand indicated in 'Part 1' of the register) has evolved. In the first few monitoring reports we included all single plots in our supply. Following the publication of Right to Build Task Force Custom and Self-Build Planning Guidance in 2021 we amended our approach to generally align with that guidance (see Section 3 of our fifth monitoring report). Since that time until the latest monitoring report our approach was to include in our supply any permissions where a Community Infrastructure Levy (CIL) Exemption Part 1 Claim Form has been submitted (a declaration that the property will be built as CSB). This year our approach has been refined to take account of legislative changes and national guidance so that in our latest monitoring report we only count permissions if they show evidence of being a CSB project by meeting some of the following criteria:

- The development has been identified as Custom and self-build on the planning application form;
- It is clear that the initial owner has had significant input into the design and layout of the scheme;
- The CIL Form 7 Part 1 has been submitted and CIL exemption granted for the project as a Custom and self-build development, with evidence of owner design input.

2 Key Points from Monitoring Report

2.1 The monitoring report shows that the overall demand for plots indicated on the self-build register was 11, with 8 on 'Part 1' of the register. This continues the reduction in the level of demand noted in the last monitoring report.

2.2 To meet the 2023/2024 demand, we will need to permission enough serviced plots to meet the demand indicated on Part 1 (8 plots) between 31/10/2024 and 30/10/2027.

2.3 The previous monitoring report (published April 2024) noted that there was a 'residual' requirement for 3 plots to be permissioned between 31/10/2023 and 30/10/2025 to meet the 2021 to 2022 demand.

2.4 Supply figures show that we permissioned 15 plots suitable for self-build between 31/10/23 and 30/10/24. Of these, 3 need to be counted against the 'residual' requirement of 3 to meet the 2021/2022 demand. This leaves 12 plots that can be counted towards the 31/10/2023 to 30/10/2024 demand of 8, leaving a 'surplus' of 3 plots (although the surplus cannot be 'carried forward' to meet the next year's supply because it predates the relevant base period).

2.5 The number of plots permissioned (15) continues the lower figure noted in last year's monitoring report and indicates that we may need to encourage more CSB opportunities to meet the minimum legal requirements.

Financial implications:

There are no direct financial implications identified in this report.

Legal implications:

The legal implications are set out within the report (002533/4 February 2025/DH).

Planning policy monitoring report

Self-build Demand and Supply Published Version

9th Self-build Monitoring Report 31/10/23 to 30/10/24



Published February 2025

East Devon – an outstanding place

Contact details

Planning Policy
East Devon District Council
Blackdown House, Border Road, Heath Park Industrial Estate, HONITON,
EX14 1EJ

Phone: 01395 516551
Email: planningpolicy@eastdevon.gov.uk

www.eastdevon.gov.uk Self-build and custom build - Monitoring - East Devon

Cover Photograph: Self-build home under construction in East Devon taken by EDDC staff.

To request this information in an alternative format or language please phone 01395 516551 or email csc@eastdevon.gov.uk

Contents and Policies

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Glossary of Terms

Self and custom house building

The building or completion by
(a) individuals,
(b) associations of individuals, or
(c) persons working with or for individuals or associations of individuals, of houses to be occupied as homes by those individuals.

But it does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person. The wording of this definition is from the 2015 (amended) Self-build Act.

Government guidance on self-build advises that "In considering whether a home is a self-build or custom build home, relevant authorities must be satisfied that the initial owner of the home will have primary input into its final design and layout".

In this report the term self-build is used to describe both custom build and self-build.

Private housebuilders, custom build and self-build

Private homebuilders are private individuals or groups of people who commission the construction of their home from a builder, contractor or package company (this is known as 'custom build' housing), or in a limited number of cases, physically build the home on their own with or without the help of sub-contractors (this is known as 'self build' housing). (Definition from Right to Build Toolkit Glossary).

Serviced plot of land

A plot of land that—
(a) has access to a public highway and has connections for electricity, water and waste water, or
(b) can be provided with those things in specified circumstances or within a specified period.

Definition included in 2015 (amended) Self-build Act.

Community Infrastructure Levy (CIL)

A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area. Learn more about the Community Infrastructure Levy. Definition taken from Planning Portal Glossary.

Base Period

Demand for self-build plots is measured yearly by 'base periods'. The first base period is the date the self-build register was started until 30/10/2016. Subsequent base periods are measured from 31st October until 30th October the following year.

Note on Legal Changes from Levelling Up and Regeneration Act 2023

Changes were made to the Self-build and Custom Housebuilding Act 2015 through the Levelling Up and Regeneration Act (LURA) 2023 (enacted on 31st January 2024). These changes were made to ensure that local authorities count only true CSB permissions. This has resulted in the adoption of a new method of counting our supply to include further examination of permissions for evidence beyond CIL exemption. The updated method has been used in this monitoring report.

Summary of demand shown on register

This table shows demand figures from the self-build register by base period.

Table 1

Base Period	Number on Part 1	Number on Part 2
30/03/16 - 30/10/16	32	0
31/10/16 - 30/10/17	40	3
31/10/17 - 30/10/18	9	9
31/10/18 - 30/10/19	19	10
31/10/19 - 30/10/20	13	10
31/10/20 - 30/10/21	26	18
31/10/21 – 30/10/22	11	17
31/10/22 – 30/10/23	9	4
31/10/23 – 30/10/24	8	3
Total	**167**	**74**

Summary of supply of 'suitable permissions granted'

This table shows supply figures by base period.

Table 2

Base Period	Number of Suitable Permissions Granted
31/10/16 - 30/10/17	31
31/10/17 - 30/10/18	43
31/10/18 - 30/10/19	61
31/10/19 - 30/10/20	39
31/10/20 - 30/10/21	36
31/10/21 - 30/10/22	16
31/10/22 – 30/10/23	18
31/10/23 – 30/10/24	15
Total	259

Summary of 2023 to 2024 Base Period (31/10/2023 – 30/10/2024)

This table highlights key outputs from the monitoring report so that the overall picture can be viewed in one place.

Table 3

Overall Demand	11 plots - See Table 4
Demand on 'Part 1'	8 plots - See Table 4
Number of plots needed to be permissioned from 31/10/24 to 30/10/27 to meet demand from 2023-2024 base period	8 plots - See Table 4
Supply (suitable permissions granted) 2023 to 2024	15 plots – See Table 5
Is there a shortfall of sites to meet demand from previous years?	Yes 3 plots to be permissioned before 30/10/2025 See Table 5
Number of individuals leaving register during base period	None
Location preferences	Budleigh Salterton is the most popular location, followed by Chardstock, Exmouth, Ottery St. Mary and Newton Poppleford, and a number of other towns and villages (see Appendix 2).
Number of bedrooms	The majority of people on the register would like a three bedroom property (see Appendix 2).
Age of applicant	Most applicants were aged between 30-39 and 40-49 years old. (see Appendix 2).

1. Requirements

1.1 The Self- build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) places a duty on local authorities to keep a register of individuals and associations of individuals who wish to acquire plots of land on which to build their own home and to publicise that register. The Levelling Up and Regeneration Act (LURA) 2023 places a responsibility on councils to ensure that only permissions for developments specified as self and custom build are included in our supply count. East Devon District Council have counted only permissions with evidence that they are self and custom build projects in the following report sections.

1.2 The East Devon register is divided into 2 parts and, generally, only those with a local connection (they work or have lived in the District for the last three years) are included on 'Part 1'. The requirement to provide enough serviced plots to meet the demand shown on the register only applies to Part 1, but both Part 1 and 2 are used to assess the general level of demand to inform decisions of the Council. The level of demand is measured in 'base periods' that run from 31st of October until 30th of October in the following year.

1.3 We reviewed our arrangements for maintaining the register in February 2023 and decided to retain the local connection test. We have never imposed a financial test or a registration fee[1].

1.4 This report sets out both the demand for self-build in East Devon, as shown by the numbers on the self-build register and the supply of self-build plots in East Devon, as taken from the Council's records of self-build exemptions to the Community Infrastructure Levy (known as CIL).

[1] See report to Strategic Planning Committee of 14th February 2023 at Agenda for Strategic Planning Committee on Tuesday, 14th February, 2023, 10.00 am - East Devon

2 Demand

2.1 The East Devon self-build register was started on 30th March 2016. Demand is measured in 'base periods'. The first base period ran from 30th March 2016 until 30th October 2016; the second base period was from 31st October 2016 to 30th October 2017; the third base period was from 31st October 2017 until 30th October 2018; the fourth base period was from 31st October 2018 until 30th October 2019; the fifth base period from 31st October 2019 until 30th October 2020, the sixth base period from 31st October 2020 until 30th October 2021; the seventh base period from 31st October 2021 until 30th October 2022, the eighth from 31st October 2022 until 30th October 2023, and the ninth from 31st October 2023 until 30th October 2024.

2.2 We have a local connection test that is met by people who work in East Devon, have lived in East Devon for at least the last three years or are current members of the regular armed forces (or former members who have left within the last three years). People who meet the local connection test are added to Part 1 of the register: we have a statutory duty to permission enough serviced plots suitable for self-build to meet the demand shown on this part of the register within three years of the end of the relevant base period. People who do not meet the local connection test are added to Part 2 of the register: there is no statutory duty to permission plots suitable to meet the demand shown on Part 2 of the register, but the total numbers (on Parts 1 and 2) must be had regard to in our planning, housing, regeneration and estate management functions.

2.3 The number of people on the register for the first base period in East Devon was 32 and the requirement to permission sufficient serviced plots to meet this demand expired on 30th October 2019.

2.4 The number of people on Part 1 of the register for the second base period was 40 with 3 on Part 2 of the register (making a total of 43). The requirement to permission sufficient serviced plots to meet this demand expired on 30th October 2020.

2.5 The number of people on Part 1 of the register during the third base period was 9, with 9 on Part 2 (making a total of 18). The requirement to permission sufficient serviced plots to meet this demand expired on 30th October 2021.

2.6 The 'Fifth' monitoring report (31 Oct 2020 to 30 Oct 2021) shows how we met the demand for self-build plots for the first, second and third base periods.

2.7 The number of people on Part 1 of the register during the fourth base period (31/10/18 to 30/10/19) was 19, with 10 on Part 2 (making a total of 29). The requirement to permission sufficient serviced plots to meet this demand expired on 30th October 2022. The 'Sixth' monitoring report showed how we met the demand during the fourth base period.

2.8 The number of people on Part 1 of the register during the fifth base period (31/10/19 to 30/10/20) was 13, with 10 on Part 2 (making a total of 23). This means that 13 plots suitable for self-build need to be permissioned between 31st October 2020 and 30th October 2023. This report shows how we met the demand during the fifth base period (see Table 5).

2.9 The number of people on Part 1 of the register during the sixth base period (31/10/20 to 30/10/21) was 26, with 18 on Part 2 (making a total of 44). This means that 26 plots suitable for self-build will need to be permissioned between 31st October 2021 and 30th October 2024.

2.10 The number of people on Part 1 of the register during the seventh base period (31/10/21 to 30/10/22) was 11, with 17 on Part 2 (making a total of 28). This means that 11 plots suitable for self-build will need to be permissioned between 31st October 2022 and 30th October 2025.

2.11 The number of people on Part 1 of the register during the eighth base period (31/10/22 to 30/10/23) was 9, with 4 on Part 2 (making a total of 13). This means that 9 plots suitable for self-build will need to be permissioned between 31st October 2023 and 30th October 2026.

2.12 The number of people on Part 1 of the register during the ninth base period (31/10/23 to 30/10/24) was 8, with 3 on Part 2 (making a total of 11). This means that 8 plots suitable for self-build will need to be permissioned between 31st October 2024 and 30th October 2027.

2.13 The demand figures are set out in Table 4 below.

Table 4 Demand for Self Build Plots and Statutory Duty to Permission Suitable Serviced Plots

Base Period	Date range for base period	Individuals	Associations	Part 1	Part 2	Plots required	Period for meeting demand
1	31/03/16 - 30/10/16	32	0	32	0	32	31/10/16 - 30/10/19
2	31/10/16 - 30/10/17	43	0	40	3	40	31/10/17 - 30/10/20
3	31/10/17 - 30/10/18	18	0	9	9	9	31/10/18 - 30/10/21
4	31/10/18 - 30/10/19	29	0	19	10	19	31/10/19 - 30/10/22
5	31/10/19 - 30/10/20	23	0	13	10	13	31/10/20 - 30/10/23
6	31/10/20 - 30/10/21	44	0	26	18	26	31/10/21 - 30/10/24
7	31/10/21 – 30/10/22	28	0	11	17	11	31/10/22 – 30/10/25
8	31/10/22 – 30/10/23	13	0	9	4	9	31/10/23 – 30/10/26
9	31/10/23 – 30/10/24	11	0	8	3	8	31/10/24 – 30/10/27

3 Supply

3.1 Permissions granted within the 2023 to 2024 base period have been analysed to ensure they meet the definition of self and custom build. Rather than only counting CIL exemption as done previously, to meet the new legislation set out by the LURA 2023, and NaCSBA guidance, EDDC will only count permissions if they show evidence of being a CSB project by meeting some of the following criteria:

- The development has been identified as Self and Custom build on the planning application form;
- It is clear that the initial owner has had significant input into the design and layout of the scheme;
- The CIL Form 7 Part 1 has been submitted and CIL exemption granted for the project as a self and custom build development, with evidence of owner design input.

3.2 Appendix 1 identifies all the plots included in our self-build supply figures for the period from 31st October 2023 until 30th October 2024. Full details of supply figures for previous years are included in the Sixth monitoring report, but a summary is included in Table 5 below. In the 2020 to 2021 base period there was a marked decrease in the number of CIL exemptions for self- build compared to previous years (16 plots compared to between 31 and 61 plots in previous monitoring years). This meant that there was a 'shortfall' of 10 plots in the first base periods in which the demand for the 31/10/20 to 30/10/21 period could be met (the 31/10/2021 to 20/10/2022 base period) leaving two years in which this demand could be met (from 31/10/23 to 30/10/25).

3.3 The lower delivery rate of plots continued in the 31/10/22 to 30/10/23 base period when 18 plots were permissioned. This supply meets both the 'residual' demand from the 31/10/20 to 31/0/10/21 (10 plots) and part of the demand from the 31/10/21 to 30/10/22 base period (8 plots), leaving a 'residual' need of 3 plots. There are two remaining years in which this demand can be met.

3.4 This trend continued into the most recent base period of 31/20/2023 to 30/10/24 with just 15 plots being permissioned. Despite this decrease, the supply meets both the 'residual' demand from the 31/10/21-30/10/2022 (3 plots) and covers all the demand from the 31/10/2022-30/10/2023 base period (9 plots), with a surplus of 3 plots.

Table 5 Supply based on permissions.

Base	Base dates	Demand	Period for meeting demand	Supply Year	Permissions	Shortfall/ surplus	Outcome
1	31/03/16 - 30/10/16	32	31/10/16 - 30/10/19	31/10/16 - 30/10/17	31	-1	demand met by 16 - 18 supply
2	31/10/16 - 30/10/17	40	31/10/17 - 30/10/20	31/10/17 - 30/10/18	43	2	demand met by 17 - 18 supply
3	31/10/17 - 30/10/18	9	31/10/18 - 30/10/21	31/10/18 - 30/10/19	61	52	demand met by 18 - 19 supply
4	31/10/18 - 30/10/19	19	31/10/19 - 30/10/22	31/10/19 - 30/10/20	39	20	demand met by 19 - 20 supply
5	31/10/19 - 30/10/20	13	31/10/20 - 30/10/23	31/10/20 - 30/10/21	36	23	demand met by 20 - 21 supply
6	31/10/20 – 30/10/21	26	31/10/21 – 30/10/24	31/10/21 - 30/10/22	16	-10	Demand met by 20 - 22 supply
7	31/10/21 – 30/10/22	11	31/10/22 – 30/10/25	31/10/22- 30/10/23	18	-3	Demand met by 21- 23 supply
8	31/10/22 – 30/10/23	9	31/10/23 – 30/10/26	31/10/23- 30/10/24	15	3	Demand met by 23- 24 supply
9	31/10/23 – 30/10/24	8	31/10/24 – 30/10/27	30/10/24- 30/10/25	Unknown		Determined in future monitoring periods

Note: No surplus can be carried forward if it predates the end of the subsequent base period

3.5 In order to assess whether the supply of potential plots included in Table 5 above is starting to deliver self-build homes, we have also assessed the number of permissions that have commenced. Table 6 below summarises the outcome. Unsurprisingly, there are fewer plots included in the supply when these figures are used (the supply year relates to the date of permissions rather than commencement), but previously the demand shown was met by sufficient plots within one or two years (up to three years is allowed). If this approach were to be taken, the 2022-2023 supply would meet the residual demand of 3 arising from the 2020 – 2021 base period, and some (6 plots) from the residual demand of 11 from the 2021-2022 period, leaving a shortfall of 17 plots that would need to be met between the 2023-2026 period.

Table 6 Supply based on commencements.

Base Period	Base dates	Demand	Period for meeting demand	Supply Year	Permissions	Shortfall/surplus	Outcome
1	31/03/16 - 30/10/16	32	31/10/16 - 30/10/19	31/10/16 - 30/10/17	23	-9	demand met by 16 - 18 supply
2	31/10/16 - 30/10/17	40	31/10/17 - 30/10/20	31/10/17 - 30/10/18	34	-15	demand met by 17 - 19 supply
3	31/10/17 - 30/10/18	9	31/10/18 - 30/10/21	31/10/18 - 30/10/19	48	39	demand met by 18 - 19 supply
4	31/10/18 - 30/10/19	19	31/10/19 - 30/10/22	31/10/19 - 30/10/20	29	10	demand met by 19 -20 supply
5	31/10/19 - 30/10/20	13	31/10/20 - 30/10/23	31/10/20 - 30/10/21	26	13	demand met by 20 - 21 supply
6	31/10/20 - 30/10/21	26	31/10/21- 30/10/24	31/10/21- 30/10/22	8	-18	Demand met by 21-24 supply.
7	31/10/21- 30/10/22	11	31/10/22-30/10/25	31/10/22- 30/10/23	15	-14	No demand is met by 22-23 supply (it is taken by the residual from the 2020/2021 base period). This leaves a residual of 3 to be met in next base period (31/10/2023 to 30/10/2024) and 11 to be met in next two base periods (31/10/2024 to 30/10/2026.
8	31/10/22- 30/10/23	9	31/10/23-30/10/26	31/10/23- 30/10/24	9	-17	No demand is met by 23-24 supply (it is taken by residual from 20/21 base period and some from the 22/23 period). This leaves a residual of 5 to be met in the next base period (31/10/2024 – 30/10/25) and 9 to be met in the next two base period (31/10/25-30/10/27)

Notes: No surplus can be carried forward if it predates the end of the subsequent base period

4 Publicity

4.1 Our web site has a dedicated self-build page where the register is advertised and the application forms are readily available.

5 Additional Information from the Self-build Register

5.1 In addition to the 'standard' questions that are needed to establish whether applicants meet the criteria set for inclusion on the self-build register, extra questions are to help tailor our approach such as where in East Devon people are most interested in building, what people are interested in building and how much money is available to finance it. The results are useful in helping to provide evidence to inform planning applications, Council decisions and policy development.

5.2 Charts are included in Appendix 2 of this report for the current monitoring year (31/10/2023 to 30/10/2024). Some key points from this show that:

- The ages of people on the register span the 30-39 group, to the 60-69 age group with the majority being between 30-39 and 40-49;
- The majority of applicants lived in East Devon;
- The most popular location for self-building was Budleigh Salterton, although several locations were highlighted;
- Three-bedroom properties are the most desired dwelling size, with 63.6% of people mentioning this or a range of 2-3/3-4.
- There is a large range in overall budget, with a median figure of £496,000 ; and.
- The majority of people on the register want a detached dwelling.

5.3 In addition to information from the last monitoring period, Appendix 3 provides similar charts from the start of the register in March 2016 until 31/10/2024. Some key points from this are that:

- over half of the people on the register lived in East Devon at the time of their application,
- the most popular age cohort for joining the register is 40-49,
- the towns of Sidmouth, Exmouth, Ottery St. Mary and Budleigh Salterton are the most popular locations.

Appendix 1 Table of Permissions Suitable for Self-build

The 'Date' column refers to the date of the permission. The 'Commenced' column specifies the number of plots that have been commenced. All sites are for single plots.

Table 7

No	Reference	Address	Proposal	Evidence of CSB	Date	Commenced
1	23/0393/FUL	Windrush, Poltimore, Devon, EX4 0AB	Proposed two storey detached dwelling and stable to replace existing barns.	Proposed as self-build in application, CIL exemption form part 1	31/10/23	23/11/23
2	23/1398/FUL	9 West Hill Lane, Budleigh Salterton, EX9 6AA	Proposed demolition of the existing dwelling and construction of a replacement dwelling	CIL exemption form part 1, Design and access statement shows owner design involvement	30/11/23	18/12/23
3	23/1729/FUL	Hand And Pen Garage, London Road, Whimple, Devon, EX5 2FX	Construction of a replacement dwelling in pursuant to planning approval 22/2834/FUL (conversion of	CIL exemption form part 1, owner involvement in final design (plans and drawings)	01/12/23	

No	Reference	Address	Proposal	Evidence of CSB	Date	Commenced
			workshop to residential dwelling and creation of a new access).			
4	23/1872/FUL	The Beacon Vaults, Beacon Hill, Exmouth, EX8 1PB	Erection of single 3 storey Georgian style Townhouse, redevelopment of site, change of use to residential and demolition of The Beacon Vaults	CIL exemption form part 1, owner involvement in final design (plans and drawings)	08/12/23	
5	23/1997/FUL	Land And Building South East Of Courshay Springs, Hawkchurch	Demolition of existing buildings and construction of 1 no. dwellinghouse (alternative to conversion of a redundant building to form 1 no. residential dwelling and associated works approval reference 21/3211/FUL).	CIL exemption form part 1, owner involvement in final design (planning statement and drawings)	21/12/23	19/07/24

No	Reference	Address	Proposal	Evidence of CSB	Date	Commenced
6	23/2200/FUL	Workforce Development Redwoods, Devon and Somerset Fire and Rescue Service Hq, Clyst St George, Exeter, EX3 0NN	Change of use from office to dwelling, with associated works and landscaping	Proposed as self and custom build on application, CIL exemption form part 1, owner involvement in final design (planning statement and drawings)	21/12/23	24/07/24
7	23/1687/FUL	Oakfield, Sanctuary Lane, Woodbury Salterton, Exeter, EX5 1ET	Demolition of barn and construction of new dwelling and access, following grant of Class Q Prior Approval (ref. 22/2797/PDQ).	CIL exemption form part 1, owner involvement in final design (plans and drawings)	05/01/24	14/08/24
8	23/2329/FUL	Land And Barns, Kerswell	Demolition of barn (following 22/2420/PDQ) and erection of dwelling, with associated landscaping.	CIL exemption form part 1, owner involvement in final design (plans and drawings)	09/02/24	09/07/24
9	24/0710/FUL	Oikos, Land Adjacent 1	Proposed new dwelling	CIL exemption form part 1, owner involvement in	24/05/24	

No	Reference	Address	Proposal	Evidence of CSB	Date	Commenced
		Highfield Lane, Exmouth, EX8 2GJ		final design (plans and drawings)		
10	23/1973/FUL	The Croft, Bendarroch Road, West Hill, Devon, EX11 1UW	Replacement dwelling, including the demolition of the existing dwelling and multiple outbuildings located within the grounds.	Owner involvement in final design and planning statement notes new dwelling will become the home of the applicant.	28/05/24	
11	24/0604/FUL	Upham Farm, Farringdon, Devon, EX5 2HZ	Demolish existing barn, proposal for 1no dwellinghouse with detached garage/workshop, and associated works.	Application for BNG exemption for self-build development, CIL exemption form part 1, owner involvement in final design (planning statement and drawings)	07/06/24	08/07/24
12	23/0493/FUL	Burcombe Farm, Wiggaton, Ottery St Mary, EX11 1PU	Conversion and alteration of farm building to create 1no dwelling, provision of vehicle parking area and construction of detached outbuilding	Described as “self-build project” in application, CIL exemption form part 1, owner involvement in final design (drawings, engineering receipts and plans)	13/06/24	22/07/24

No	Reference	Address	Proposal	Evidence of CSB	Date	Commenced
			housing carport and bat loft			
13	24/0139/FUL	Kenwood , Woodhouse Hill, Uplyme, DT7 3SL	Demolition and replacement of the existing dwelling and garage and associated minor external works within garden.	CIL exemption part 1, owner involvement in final design (plans and drawings), planning statement notes dwelling will become a family home for the applicant.	13/06/24	
14	24/1485/FUL	The Oaks , Aylesbeare, Devon, EX5 2DE	Demolition of existing dwelling, Proposed construction of 1 no. replacement dwelling	Proposed as self and custom build on application, applied for BNG exemption for self build, CIL exemption form part 1, owner involvement in final design (plans and drawings)	09/09/2024	04/11/2024
15	24/1521/FUL	Lismore , Station Road, Feniton, Devon, EX14 3ED	Erection of new dwelling and demolition of existing dwelling.	Proposed as self and custom build on application, applied for BNG exemption for self build. CIL exemption form part 1	14/10/2024	

Appendix 2 Additional information from register 31/10/2023 to 30/10/2024

All figures relate to entries on the self-build register between 31/10/2021 and 30/10/2022 only. Numbers around the pie charts refer to the number of responses.

Figure 1 – Current place of residence

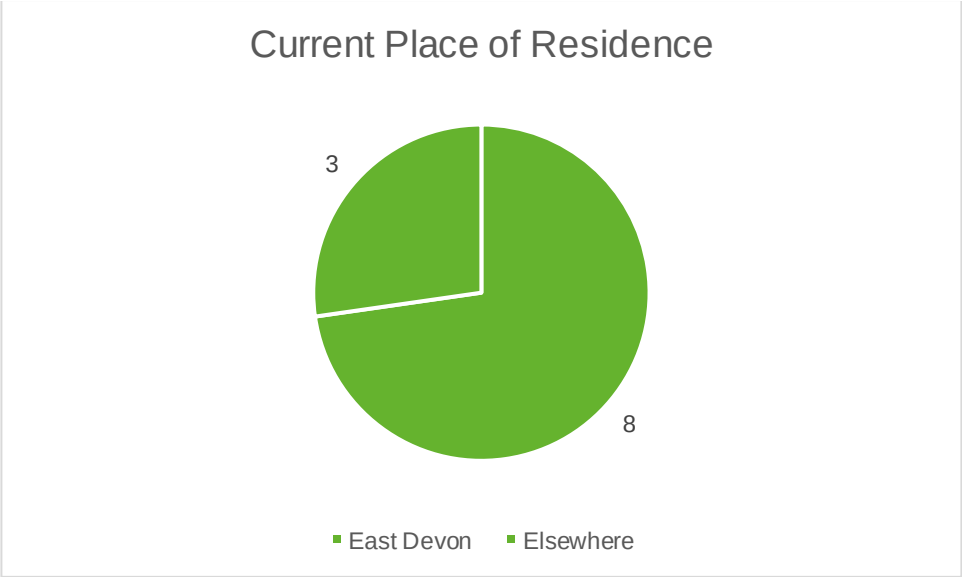


Figure 2 – Age of applicant

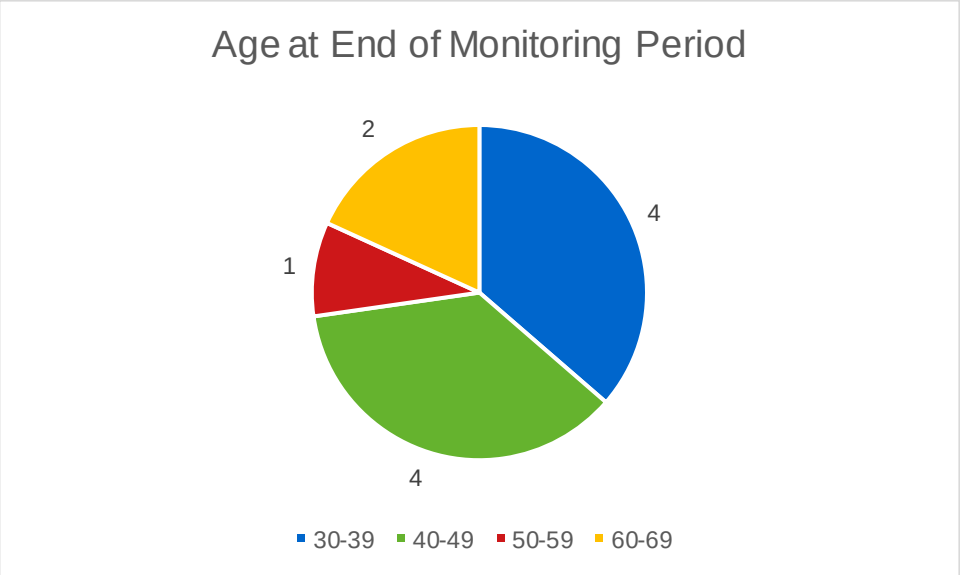


Figure 3 – Where plots are wanted.

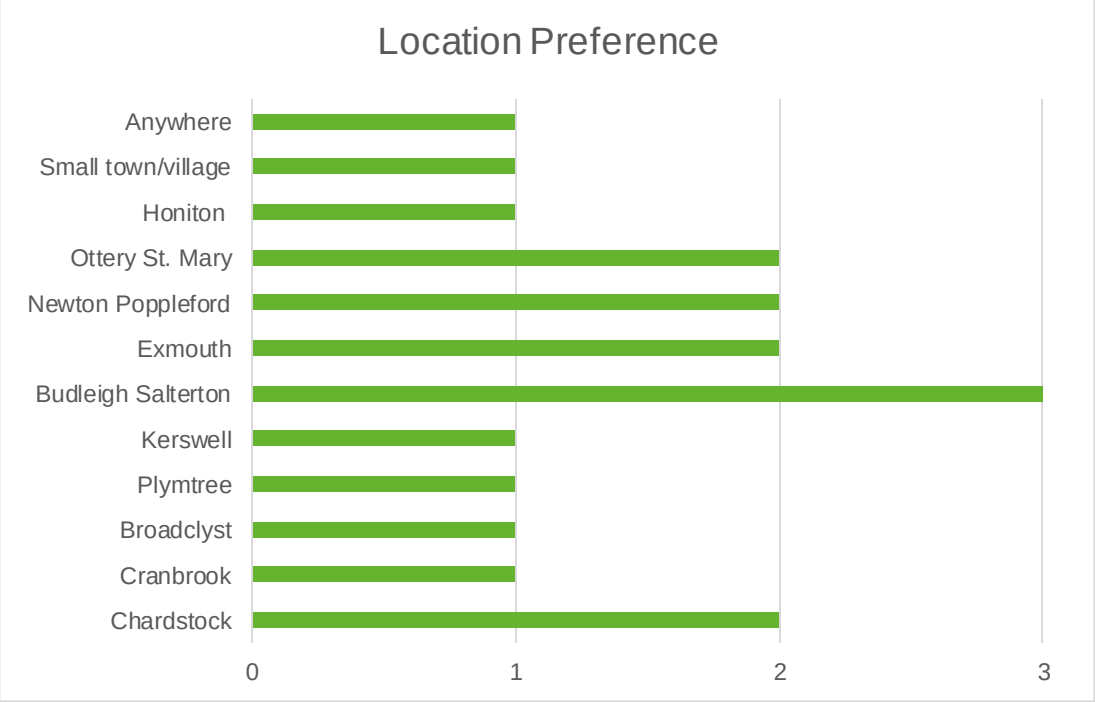


Figure 4 – Number of bedrooms wanted.

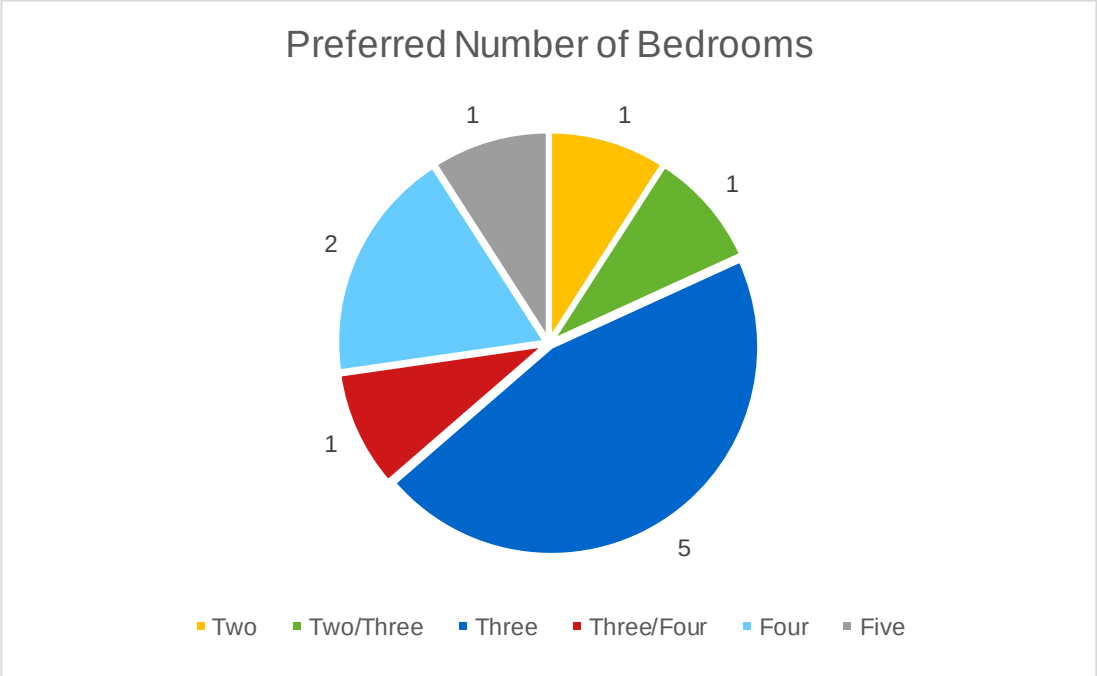


Figure 5 – Type of dwelling wanted

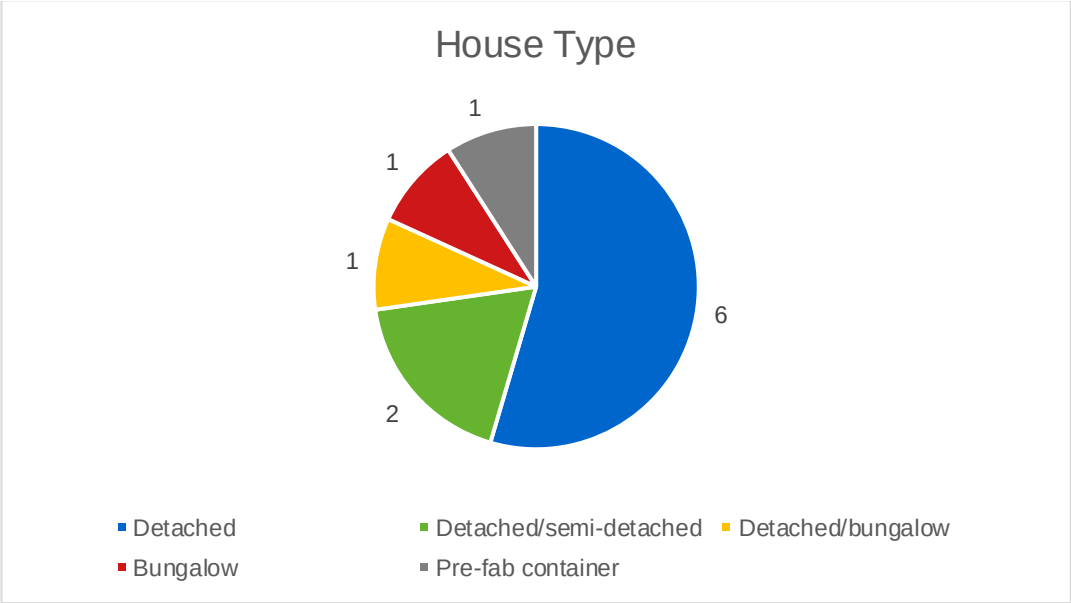
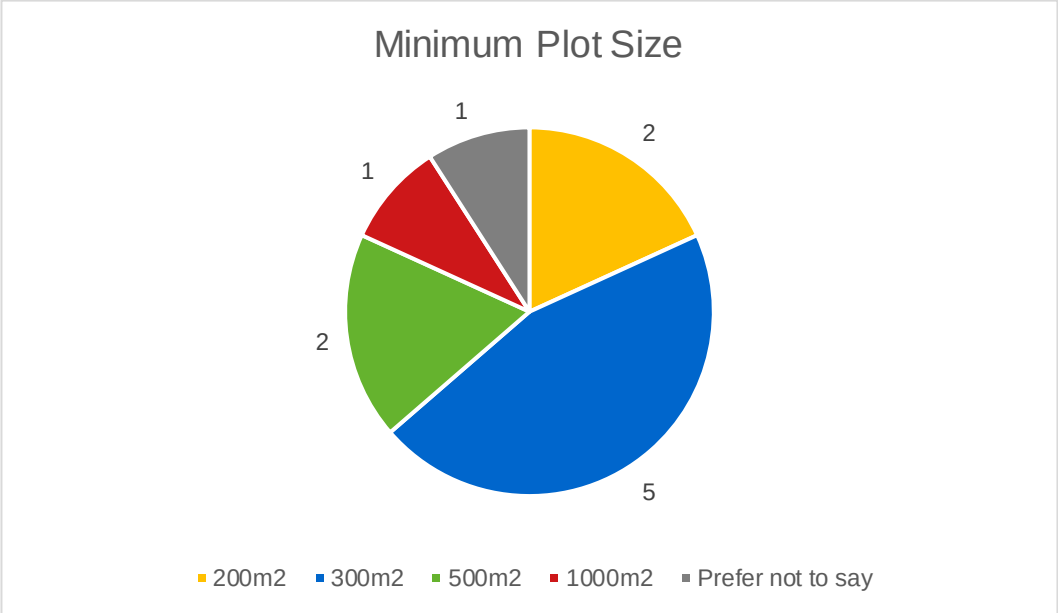


Figure 6 – Minimum plot size wanted



Plot preferences - Please note that, as a rough guide, a plot of 200 m² or less would accommodate a small terraced house; a 200m² to 300m² plot, a 2/3 bed modern estate house ; a 300m² to 500m² plot, a 4 bed detached estate house; a 500m² to 1000m² plot, a suburban semi/detached with modest to large garden; a 1000m² to 4047m² (1 acre) plot, a house with a large/very large garden; and a 4047m² (1 acre) to 1 hectare plot, a house with very large garden/small holding.

Figure 7 - Maximum plot size wanted

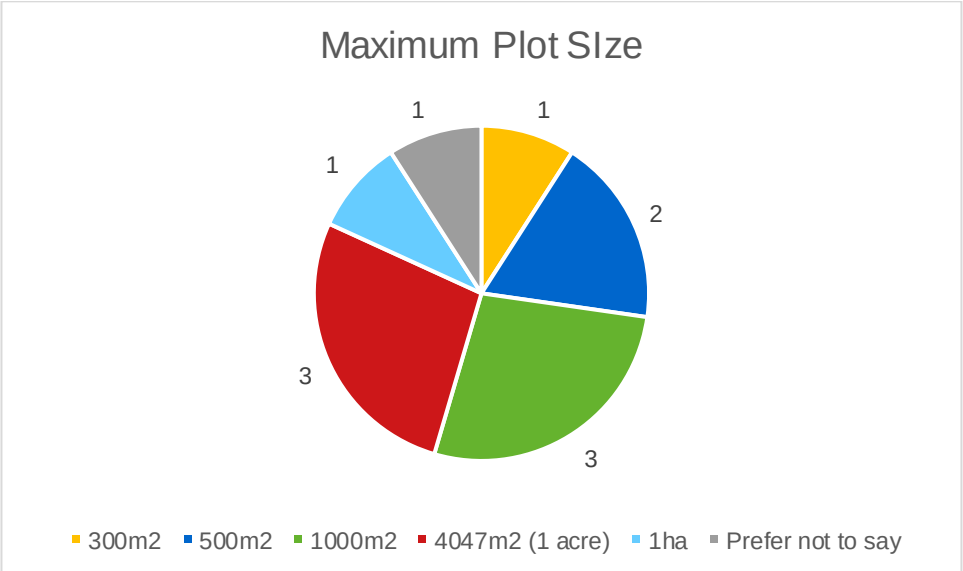


Figure 8 – Budget (plot only)

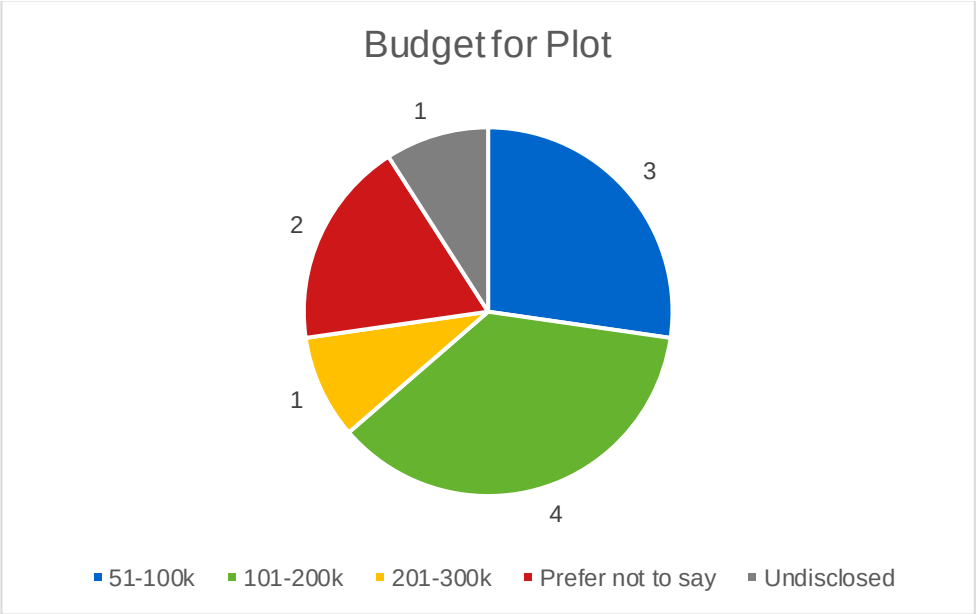
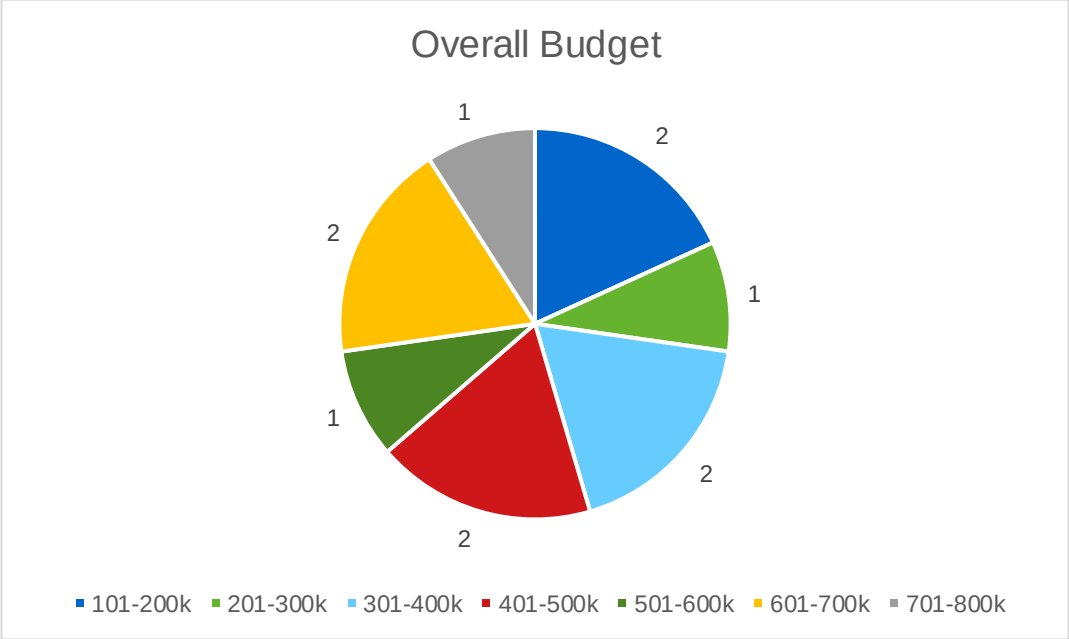
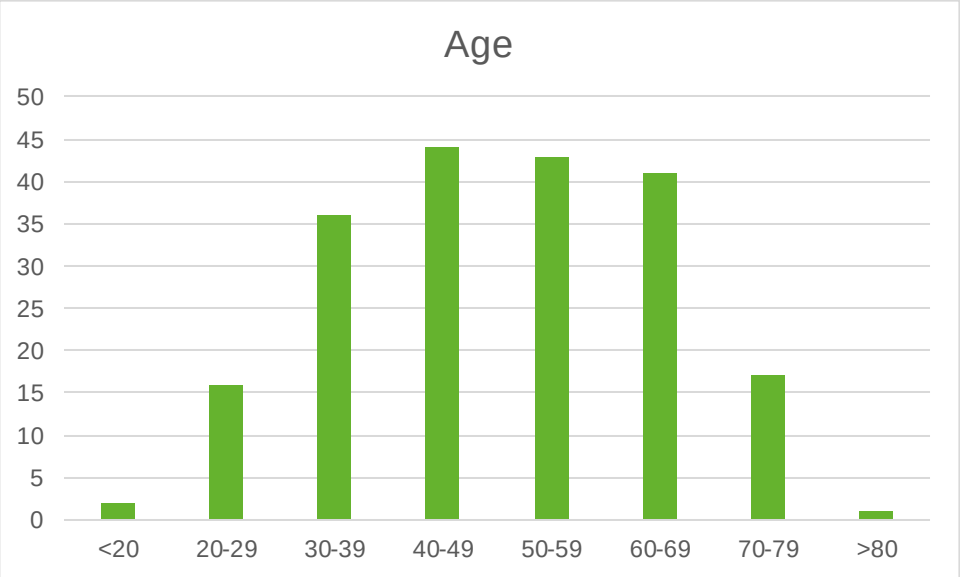
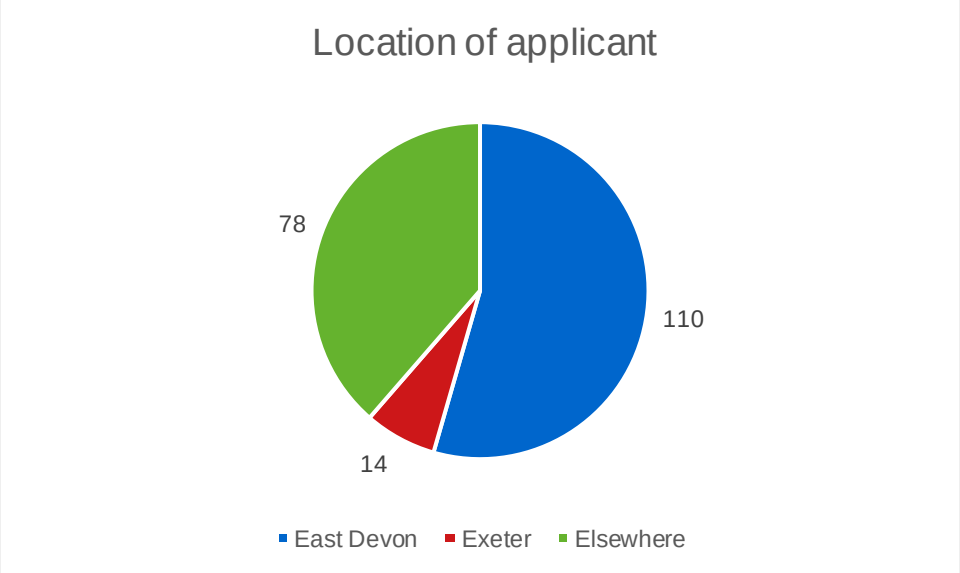


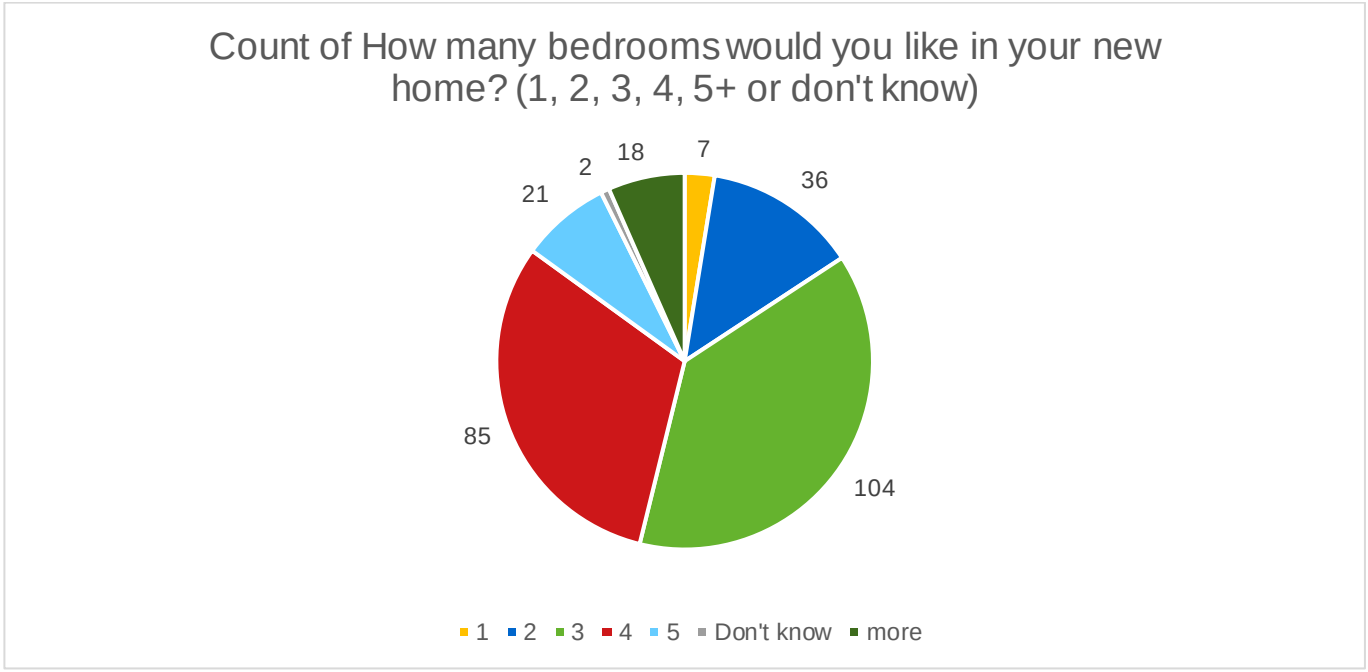
Figure 9 – Overall budget (land and building costs)

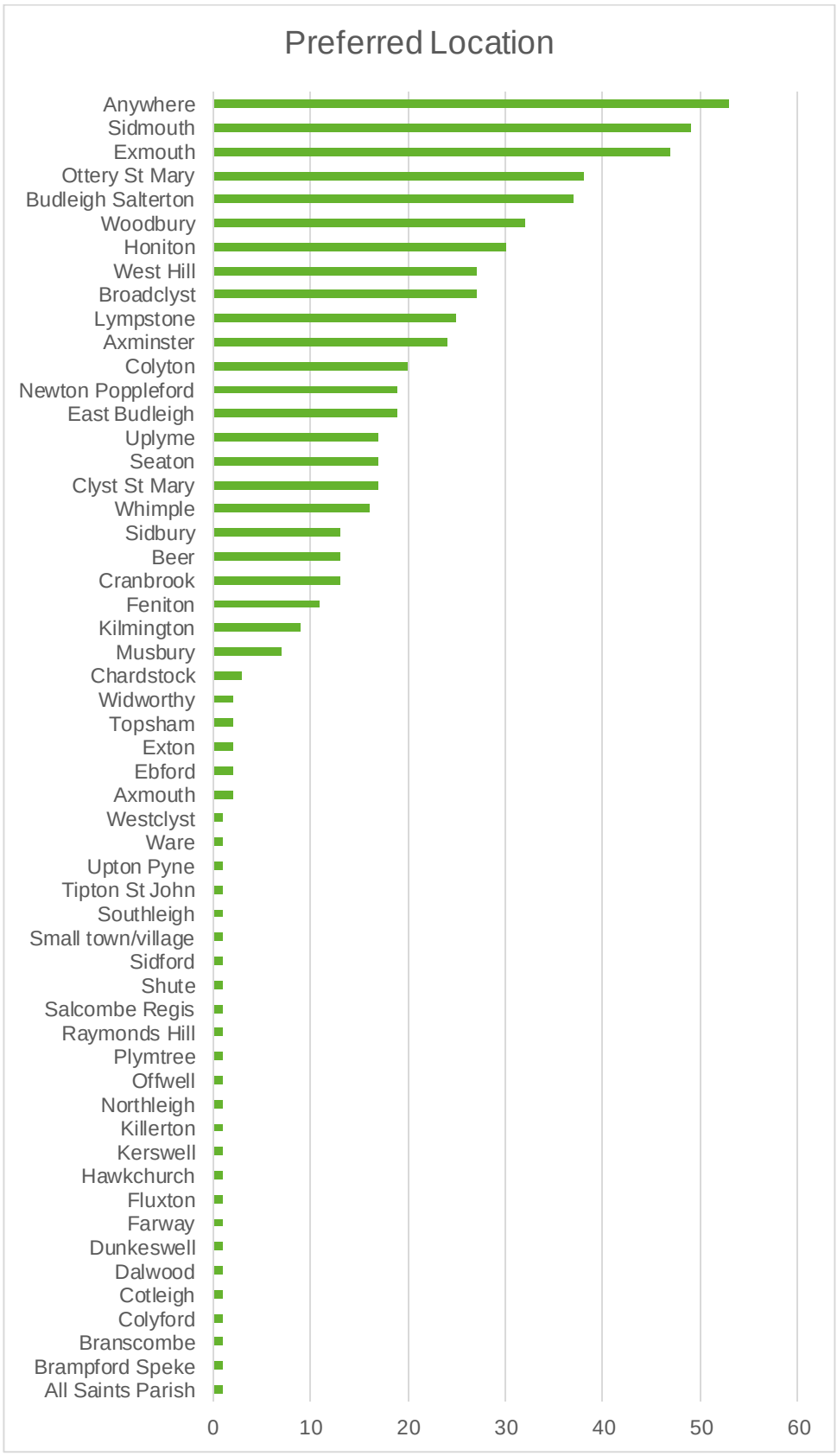


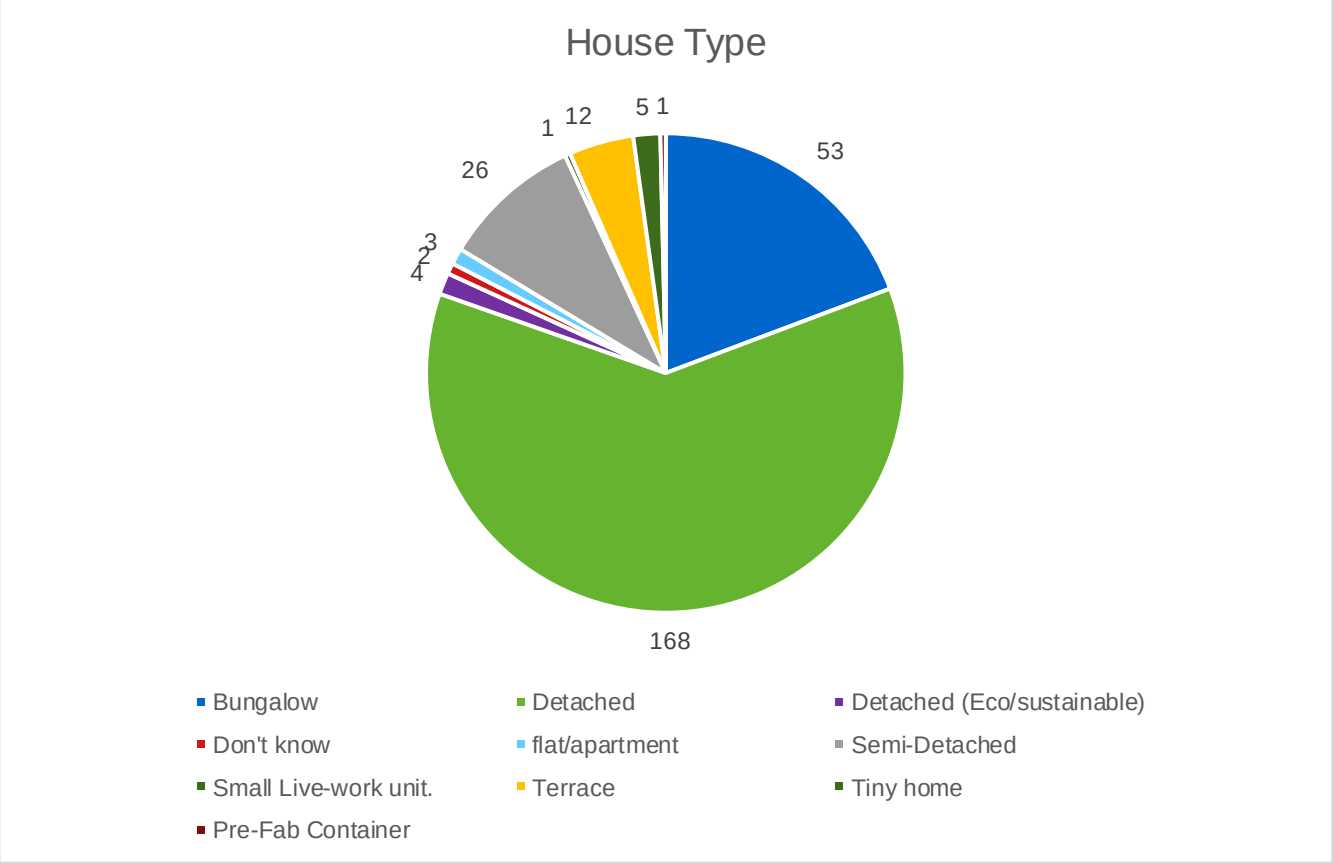
Appendix 2 Additional information from register 30/03/2016 to 30/10/2024

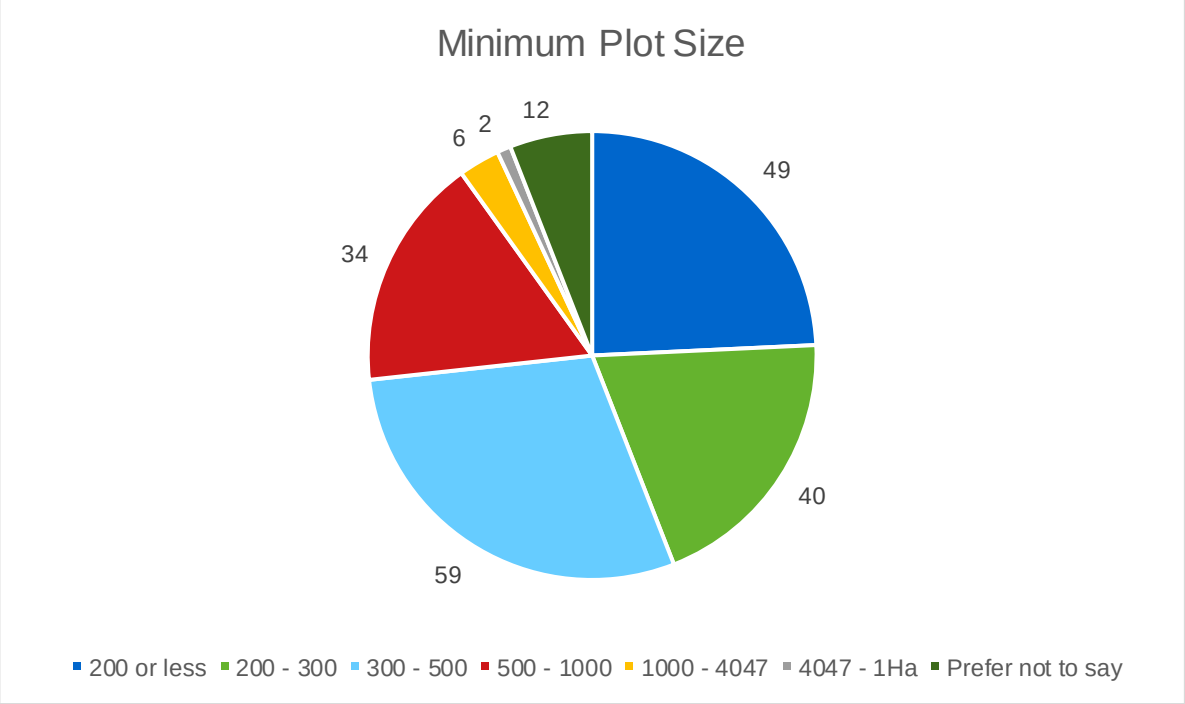


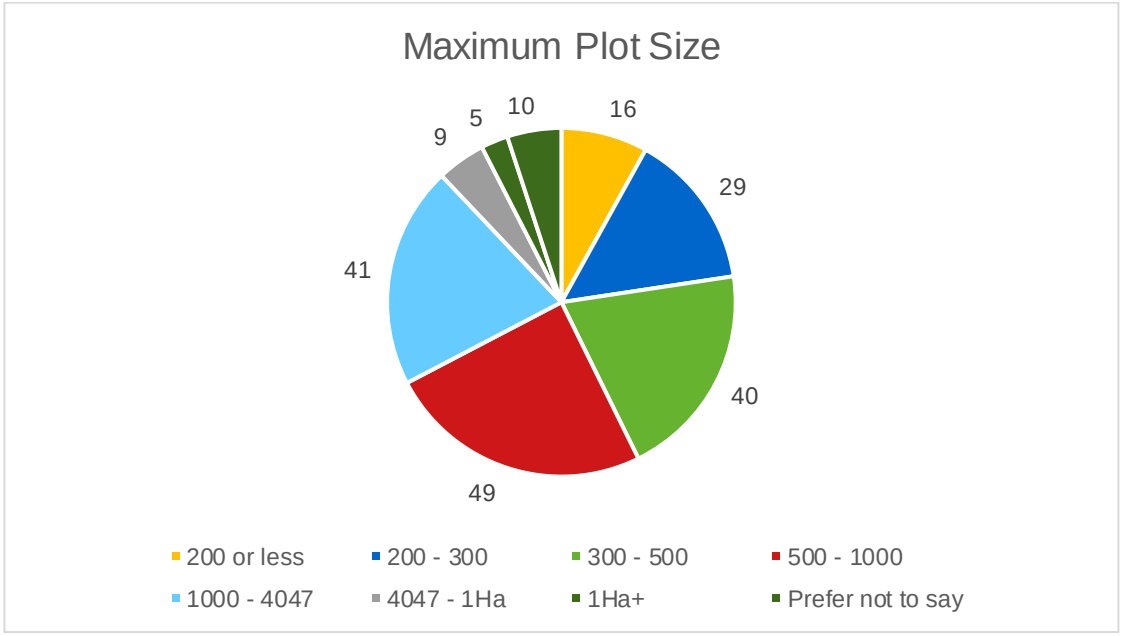


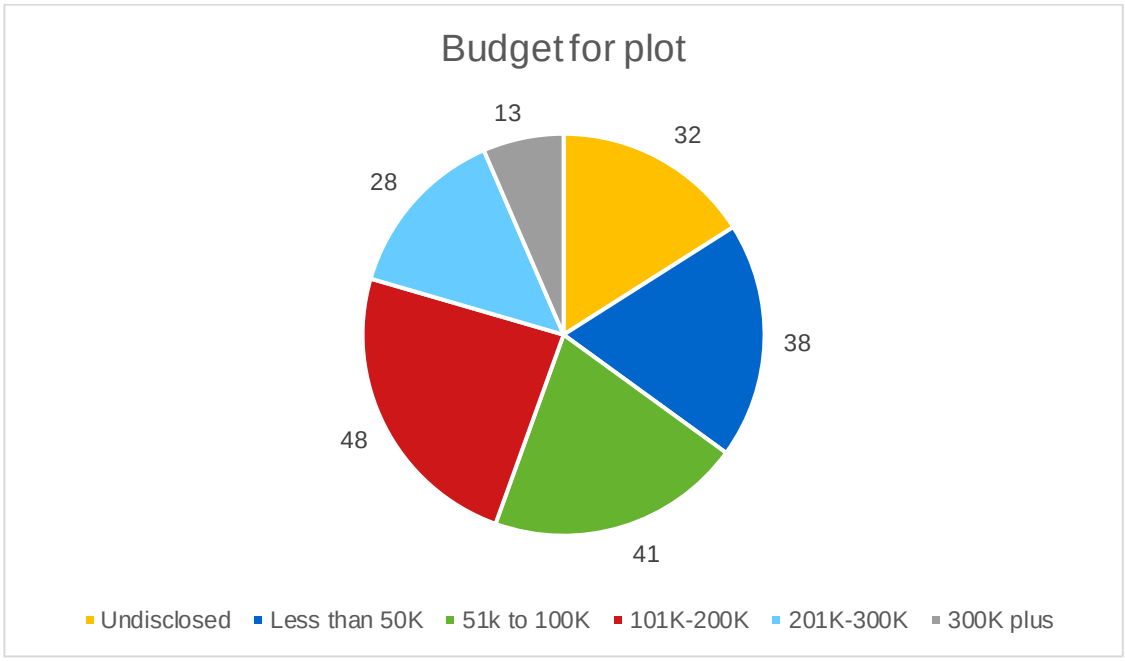

Count of How many bedrooms would you like in your new home? (1, 2, 3, 4, 5+ or don't know)
7
36
104
85
21
2
18
1
2
3
4
5
Don't know
more


Preferred Location
Anywhere
Sidmouth
Exmouth
Ottery St Mary
Budleigh Salterton
Woodbury
Honiton
West Hill
Broadclyst
Lympstone
Axminster
Colyton
Newton Poppleford
East Budleigh
Uplyme
Seaton
Clyst St Mary
Whimple
Sidbury
Beer
Cranbrook
Feniton
Kilmington
Musbury
Chardstock
Widworthy
Topsham
Exton
Ebford
Axmouth
Westclyst
Ware
Upton Pyne
Tipton St John
Southleigh
Small town/village
Sidford
Shute
Salcombe Regis
Raymonds Hill
Plymtree
Offwell
Northleigh
Killerton
Kerswell
Hawkchurch
Fluxton
Farway
Dunkeswell
Dalwood
Cotleigh
Colyford
Branscombe
Brampford Speke
All Saints Parish
0
10
20
30
40
50
60


House Type
53
168
26
12
5
1
1
3
2
4
Bungalow
Detached
Detached (Eco/sustainable)
Don't know
flat/apartment
Semi-Detached
Small Live-work unit.
Terrace
Tiny home
Pre-Fab Container


Minimum Plot Size
49
40
59
34
6
2
12
200 or less
200 - 300
300 - 500
500 - 1000
1000 - 4047
4047 - 1Ha
Prefer not to say


Maximum Plot Size
16
29
40
49
41
9
5
10
200 or less
200 - 300
300 - 500
500 - 1000
1000 - 4047
4047 - 1Ha
1Ha+
Prefer not to say


Budget for plot
32
38
41
48
28
13
Undisclosed
Less than 50K
51k to 100K
101K-200K
201K-300K
300K plus


East
Devon
District Council

Report to: Strategic Planning Committee

Date of Meeting: 4 February 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

New planning policy – Local Development Scheme

Report summary:

The Local Development Scheme (LDS) sets out a programme and timetable for production of future planning policy documents. The previous LDS dates from late 2024, but in response to communication from the Ministry of Housing, Communities Local Government, dated 13 December 2024, an update is required. This report introduces the proposed new LDS, summarises key content and provides more information on plan production considerations.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

That Strategic Planning Committee recommend to Council that the proposed new Local Development Scheme, as appended to this report as Appendix 1, should be endorsed and take effect immediately following approval.

Reason for recommendation:

To ensure the Council has an up to date Local Development Scheme.

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

Portfolio(s) (check which apply):
☒ Climate Action and Emergency Response
☒ Coast, Country and Environment
☐ Council and Corporate Co-ordination
☐ Democracy, Transparency and Communications
☐ Economy and Assets
☐ Finance
☒ Strategic Planning
☒ Sustainable Homes and Communities
☒ Tourism, Sports, Leisure and Culture

Equalities impact Low Impact

Climate change Low Impact

Risk: Low Risk; The direct risk is low. But a new LDS related to the issue of local plan production for which there are wider substantive risks.

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

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1. Introduction

1.1 There is a requirement for planning authorities to have an up-to-date Local Development Scheme (LDS). The LDS is programme planning document setting out timetables for plan making work.

1.2 The new proposed LDS forms a future work programme for the Planning Policy team at the Council and is appended to this committee report. The new LDS lists key policy documents that are proposed to be produced by the Planning Policy team or in which the policy team is partnering in production. The LDS also provides an overview of and advises on relevant planning policy work undertaken by outside partners, to include Devon County Council, in respect of waste and minerals plans and local communities in respect of Neighbourhood Plan making.

1.3 The reasons for this new LDS, noting the last one was approved in late 2024, is because the Ministry of Housing, Communities and Local Government advised on the 13 December 2024 Chief Planner's newsletter December 2024 (publishing.service.gov.uk) that:

"Updated Timetables for Local Plan Preparation In light of the changes to the NPPF, the Deputy Prime Minister has asked that all local planning authorities produce an updated Local Development Scheme (LDS) within 12 weeks of the publication of the NPPF, i.e. by no later than 6 March 2025. The updated LDS should include clear, realistic, and specific dates for consultation and submission of the local plan. We ask that once updated, the LDS is made publicly available, and a copy is sent to the Ministry ....."

1.4 The main change from the previous version of the LDS is that the first stage Regulation 19 consultation will now start in February 2025 rather than January.

We are required to report to government that we have updated the LDS and hence bringing this report to committee now.

Financial implications:

There are no direct financial implications identified in this report.

Legal implications:

The legal implications are set out within the report (002533/4 February 2025/DH).

East Devon Local Development Scheme – February 2025

The work programme for planning policy production in East Devon



East Devon – an outstanding place

Contact details

Planning Policy Team
East Devon District Council
Blackdown House, Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ

Phone: 01395 516551
Email: planningpolicy@eastdevon.gov.uk

http://eastdevon.gov.uk/planning/planning-policy/

To request this information in an alternative format or language please phone 01395 516551 or email csc@eastdevon.gov.uk

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1 Introduction

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

1.2 East Devon District Council has resolved that this new LDS should take effect from date to be inserted once confirmed. This LDS covers the time period from February 2025 through to the end of 2026, it is envisaged however that it will be revised and superseded before this end date.

2 The stages in Development Plan Document preparation

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

2.2 DPDs are of fundamental importance in respect of informing prospective developers of the types of development and locations for development that are likely to be appropriate and they are the key policy documents used in determining planning applications. DPDs also inform communities, infrastructure and service providers and other council and wider service providers of development proposals. There are specific legally defined procedural steps that need to be complied with by the Council in order to produce a DPD, some of these are referred to in this LDS, however for a more complete picture see: The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), noting that future changes may be made: http://www.legislation.gov.uk/uksi/2012/767/contents

2.3 In this LDS we set out dates for undertaking key stages in production of DPD. The stages we report on are summarised below:

- Issues Consultation – this is the starting point where comments on general issues and plan scope are sought. At this stage of plan making potential options and alternatives for development may be identified.
- Draft plan – this is where a draft version of the plan or some other consultation document or documents are produced and feedback is sought.
- Publication – this is the plan that the Council intend to submit for examination. The plan is made available and formal objections and other responses are sought from at this stage. Anyone can comment.

- Submission – the publication plan, the evidence supporting the plan and the formal responses to the plan are submitted to the government who appoint an independent inspector to consider the soundness of the plan. The examination of a plan, carried out by a Planning Inspector, starts at plan submission.
- Inspector's Hearings – as part of the examination process there will typically be hearing sessions at which the Inspector will lead discussion on the contents of the plan, this helps the Inspector prepare their report.
- Adoption – the Council receive a report from the inspector and can then, assuming earlier tasks do not need to be revisited, adopt the plan.

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

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

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

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

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

4 Future Development Plan Documents in East Devon

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

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

- Issues Consultation – completed in January 2021.
- Draft plan – the first consultation was completed in January 2023 and there was further consultation in summer 2024.
- Publication – Regulation 19 consultation:
  - First round - projected to start February 2025.
  - Second round – projected to start in Spring 2025.
- Submission – Autumn 2025.
- Inspector's Hearings – 2025/2026.
- Adoption – Late 2026.

4.3 The above timetable sets out two stages of Publication consultation. The first will be for the full local plan, all content, bar selected elements applicable to the development of and policy for the new town proposals (a second new town over and above Cranbrook). There is, in late 2024, and going into 2025, ongoing master planning work for the new town and there is also a cross-local authority transport study that is being carried out, this is focussed on assessment of transport impacts and mitigation options at around Exeter and its hinterland. These two streams of evidence will be instrumental in informing and justifying local plan policy at and for the new town. Though as they will not be concluded until Spring 2025 it is deemed appropriate to run a second round of Publication consultation in Spring 2025, specifically and majoring on new town matters.

4.4 The overall plan making timetable will be kept under review in the light of possible changes that may be made by Government to plan rules. These are expected to include transitional arrangements to allow existing plans to progress under existing arrangements and the timetable set out above is written in response to Government consultation proposals (but final Government regulations are yet to be determined (they may appear in late 2024 or potential 2025). Timetabling matters will be kept under review in response to potential changes from Government and particular timing and deadline rules they set out.

4.5 It should be noted that the intent is that the new local plan will supersede and replace in its entirety the existing local plan and also the villages Plan. The Cranbrook Plan will remain parts of the Development Plan though some parts, a limited number of policies within it, will be superseded by new local plan policies.

5 Other policy documents identified for production

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

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

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

6 Community Infrastructure Levy - Charging Schedule

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

6.2 In order to be able to charge CIL the Council had to produce a charging schedule that is supported by financial viability assessment evidence, undertake consultation and take the work to Examination by an independent examiner. In this respect production of the CIL charging schedule follows a similar path to that for DPDs (but under separate legislation). The current charging schedule was approved in 2020 and applied from 1 February 2021. A timetable for production of a new CIL charging regime is to be established. Work is projected to start in 2025.

7 Neighbourhood Plans

7.1 Neighbourhood Plan are produced by local communities and in East Devon they are typically produced at the parish level. Neighbourhood Plans set out policies and proposal for development and in this respect they are similar to DPDs and they follow reasonably similar stages in production (but under separate legislation). Once adopted (the technical term is that they are made) they also form part of the Development Plan for the District and are used

alongside DPDs, SPDs and other policy documents in the determination of planning applications.

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

8 Waste and minerals planning and Devon County Council work

8.1 The responsibility for waste planning and minerals planning in East Devon rests with Devon County Council; they have legal responsibility for producing plans and determining planning applications for these two matters. The County Council adopted a new Devon waste plan in 2014 and adopted a new minerals plan in 2017. For more information see: https://www.devon.gov.uk/planning/planning-policies/minerals-and-waste-policy

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