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Agenda for Strategic Planning Committee Tuesday, 25th November, 2025, 10.00 am

Members of Strategic Planning Committee
Councillors: B Bailey, J Bailey, K Blakey, C Brown, 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

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(or group number 01395 517546)
Monday, 17 November 2025; Reissued Wednesday, 19 November 2025

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 - 9)

2 Apologies

3 Declarations of interest

Guidance is available online to Councillors and co-opted members on making declarations of interest

4 Public speaking

Information on public speaking is available online

5 Matters of urgency

Information on matters of urgency is available online

6 Confidential/exempt item(s)

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

7 East Devon Local Plan - Second Stage of Regulation 19 Consultation (Pages 10 - 624)

This report seeks Committee approval for the second stage of consultation on the East Devon Local Plan, under plan making Regulation 19.

8 Heritage Strategy 2024 - 2042 (Pages 625 - 721)

To agree an updated Heritage Strategy for public consultation to run from 2024 – 2042.

9 Housing Monitoring Update to Year Ending 31 March 2025 (Pages 722 - 759)

This report provides a summary of house building monitoring information to the year ending 31 March 2025.

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

Decision making and equalities

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EAST DEVON DISTRICT COUNCIL

Minutes of the meeting of Strategic Planning Committee held at Council Chamber, Blackdown House, Honiton on 30 September 2025

Attendance list at end of document
The meeting started at 10.00 am and ended at 12.22 pm

20 Minutes of the previous meeting

The minutes of the previous meeting held on 2 September 2025 were confirmed as a true record, subject to Councillor Geoff Jung being added to the list of apologies.

21 Declarations of interest

Minute 26. Coastal Change Management Areas
In accordance with the Code of Good Practice for Councillors and Officers dealing with planning matters as set out in the Constitution, Councillors Geoff Jung and Todd Olive advised that they had been lobbied by residents regarding coastal change management areas.

22 Public speaking

Mr Shillitoe had request to speak on agenda items 1 and 7. He expressed his concerns over the minutes of the last meeting. He felt that there was an inherent conflict with EXMO 20 and that the site was currently not legally compliant, due to there being no mitigation strategy, and no HRA to support the Local Plan. He felt that the maps used were inconsistent, misleading and conflicting. He challenged the officers and urged councillors to make informed decisions with all the information available to them.

Mr Hamill had requested to speak on agenda item 7 and began by listing what he regarded as EXMO 20 failings. He went on to describe the role of a councillor and urged members when considering Marlcombe not to repeat what he perceived to be the errors of the March consultation. He suggested that EXMO 20 be removed from the second consultation and that the numbers be incorporated into Marlcombe.

Mr Humphrey spoke on two areas, the Regulation 19 process and the draft Local Plan. In relation to the Regulation 19 consultation, he stated that it had been six months since the consultation had finished and he had yet to receive any responses to the questions or comments asked. He asked when responses to the comments would be published. In relation to EXMO 20 Mr Humphrey commented that he believed that there were direct conflicts with the draft Local Plan, which had been agreed by the Strategic Planning Committee. He asked when the developers' Regulation 19 information or submissions needed to align with the draft Local Plan and added that he felt that the draft Local Plan should be agreed so that EDDC could control and deliver the best possible developments for the communities. Taking into account that the Plan would not be adopted until 2027, Mr Humphrey also asked whether a developer could submit an application for a site within the draft Local Plan for it to be approved by EDDC before the Plan had been adopted.

Councillor Roy Collins stated that he was a proud Devonian and felt that the countryside was being ruined by developers carrying out Government policy. He commented that there were more vacant homes than homeless people worldwide and that in the UK there

were 1 million empty homes and the birth rate was falling. He asked why more homes were required and stated that by 2050 nearly 25% of agricultural land would disappear and that farmers could not produce food for the nation if the land was being developed on. He felt that EDDC had done nothing to protect agricultural land. He suggested increasing housing numbers on other sites to save agricultural land.

The Assistant Director – Planning Strategy and Development Services replied to Mr Humphrey's questions. The draft Local Plan had received over 3000 comments and responses would not be made on a 1-2-1 basis. Officers would be responding to comments through the many reports coming to the Strategic Planning Committee and in the second Regulation 19 consultation. Developers were entitled to promote additional development, so there was no need for developers' plans to align with the plans in relation to EXMO 20 before the draft Local Plan was adopted. It was clarified that a further version of the EXMO 20 plan would be brought to a future meeting of the Strategic Planning Committee to be considered and agreed.

23 Matters of urgency

There were no matters of urgency to discuss.

24 Confidential/exempt item(s)

There were no confidential or exempt items.

25 Marlcombe SPC Report

The Assistant Director – Planning Strategy and Development Services' report sought members' agreement to changes to Policy WS01 within the Regulation 19 version of the Local Plan to reflect further work that had taken place on the new community including reference to its name, Marlcombe, and specific policy requirements that had emerged through work on the masterplan and other work for the new town.

Members agreement was also sought to consult on the proposed masterplan and associated vision document, which set out its evolution. A similar document had also been prepared to show the work on assessing and mitigating the impacts of the development on transport infrastructure as well as a strategic outline business case for the development of the new town. These documents were also envisaged to form part of the second Regulation 19 consultation albeit in the case of the strategic outline business case, only the executive summary was intended for consultation purposes. This was to ensure that the development of Marlcombe was supported by appropriate planning policy and associated evidence and guidance documents and that the vision and strategy for its delivery was fully explained to consultees through the upcoming second Regulation 19 consultation. It was noted that Regulation 19 consultation was likely to commence in November 2025 for a six-week period.

Members were asked to review and consider the following:

- Masterplan
- Transport vision.
- Strategic outline business case.
- Revised vision.
- Revised policy WS01.
- Infrastructure delivery plan.

During his presentation the Assistant Director - Planning Strategy and Development Services explained that Marlcombe would have neighbourhood centres, employment land provision and employment within the town centre and two park and ride facilities which would provide focus points for public transport. Marlcombe's challenges included:

- Topography
- Heritage
- Landscape
- Flooding
- Utilities
- Noise and air quality
- Airport safeguarding
- Land control

Key changes included:

- Provision of land for wastewater facilities.
- Material recycling facilities.
- Balancing employment land with more employment adjacent to A30.
- Renewable energy facilities.

The engagement timeline was outlined:

- January – March 2021 issues and options.
- November 2022 – January 2023 Regulation 18 consultation.
- September 2024 Masterplan consultation.
- February – March 2025 Regulation 19 consultation.

The site allocation masterplan:

- Retained the principle of the three neighbourhoods.
- The town centre was located with visibility and prominence on key routes, very much at the heart.
- There was a balance of employment spaces north and south.
- A proposed key route which brought out access onto the A3052.
- Opportunities to deal with the topography of the site, although some challenges remained.
- Park and ride facilities both north and south.

Transport vision:

- Key features were around internalisation of trips through phased delivery of services and facilities alongside the housing, ensuring that as the new homes were built the town had the employment spaces, the community facilities and the infrastructure that it needed.
- If trips were internalised and out-commuting minimised the town would have sustainable travel movements, so creating 20-minute neighbourhoods.
- The town was designed to be very compact, self-contained and internalising trips where possible.
- There were park and ride facilities to the north and south.
- There was an internalised circular bus route.
- Looking to link into Digby and Sowton railway station as well Cranbrook.
- The transport vision was making the most of transport links in both directions.
- Some improvements to the road networks were required.

The strategic outline business case was a key document in terms of delivery of the Marlcombe scheme. It needed to secure a delivery vehicle and to ensure central Government funding.

Discussion included:

- The importance of design and local influence on that. Members questioned how much control on architectural style EDDC would have. A design code would be developed and EDDC were exploring the role of the master developer position.
- There should be different products in Cranbrook and Marlcombe and they should not compete with each other.
- The first units in Marlcombe were likely to come on site in 2031.
- Allotment allocation – theses were included in the land budget and were regarded as key to the new town.
- Parking requirements of workplaces – this would be considered further as work progressed and it was possible to develop policy guidance.
- There were a number of challenges with housing numbers. The build rates were set as they were, with conservative numbers as it was very hard to predict when delivery might start and the speed at which it would take place. There was a need to strike a balance between being ambitious and being conservative about delivery rates so that EDDC was not entirely dependent on Marlcombe in achieving the 5-year housing supply.
- In terms of the infrastructure delivery plan, the cemetery should be included on the same level of importance as play areas. It was confirmed that cemeteries were included within the wider infrastructure list. Members felt play areas, allotments and amenity green space should be regarded as critical. The issue was what was to be delivered and when. The Assistant Director – Planning Strategy and Development Services clarified that the items regarded as critical in the master plan were statutory requirements. The report did not include a definition of what was regarded as critical. It was suggested that the prioritisation of items be removed from the infrastructure delivery plan, however they were regarded as helpful when allocating finite funding.
- Providing adequate sewage services. The key thing was to set aside sufficient areas of land. EDDC was continuing to work with South West Water on providing improved facilities in the district.
- The development corporation would be crucial.
- Communications were vital, especially around specific areas such as sewage and proposed solutions, transport, affordability, local facilities including schools, governance, and the wider civic proposition with Cranbrook. This should be a top communications priority for the Council.
- Housing need, land use across the nation and density of development at Marlcombe were all debated.
- Government funding would be key on delivering aspirations. It was unclear at present as to the level of funding but Marlcombe had new homes programme support.

It was noted that the revised vision had been made more locally specific, but the focus of the vision had remained. During the meeting clarification was sought on the number of properties to be provided and the Assistant Director – Planning Strategy and Development Services agreed to amend the vision statement to incorporate ‘at least 10,000 properties’. Members debated the classifications given in the infrastructure delivery plan for Marlcombe, included as Appendix 2 to the report, and were reminded that it was an iterative process, with the infrastructure delivery plan being under continued review. Officers were thanked for a fantastic report and vision.

RESOLVED: that members of Strategic Planning Committee:

1. Agreed that the revised vision statement for Marlcombe be included in the second Regulation 19 version of the Local Plan for consultation.
2. Agreed that the revised wording for Strategic Policy WS01 included as Appendix 1 to the report be included in the second Regulation 19 version of the Local Plan for consultation.
3. Agreed that the appended Masterplan Vision (including any agreed revisions to the vision referred to in recommendation 1), Transport Vision and Strategic Outline Business Case - Executive Summary documents in relation to Marlcombe new town form part of the evidence base for the second Regulation 19 consultation on the new Local Plan planned for Autumn/Winter 2025 subject to delegated authority to the Assistant Director –

Planning Strategy and Development Management in consultation with the Portfolio Holder for Place, Infrastructure and Strategic Planning to agree any minor changes.

4. Considered and commented on the emerging Infrastructure Delivery Plan for Marlcombe included as Appendix 2 to the report.

26 Coastal Change Management Areas report

The Assistant Director – Planning Strategy and Development Services' report set out information and recommendations in respect of where Coastal Change Management Areas (CCMAs) were defined, the justification for this and the policy relating to CCMAs.

The CCMA boundary defined in the first Regulation 19 plan was largely based on work undertaken by the university of Plymouth. It was acknowledged that new national coastal erosion risk management mapping (NCERM) had been recently updated, but it was too late for this work to be taken into account at that time. The boundaries had now been redefined to generally account for both the University of Plymouth work and the NCERM. In the vicinity of Cliff Road in Sidmouth, the line is redrawn to align with new national coastal erosion risk mapping lines (though noting that these were similar to those shown in the first Regulation 19 consultation plan).

One option highlighted in the report and considered by the committee was to use both the Plymouth work and the NCERM to inform the plan and to take whatever was the more landward extent of the area identified as being potentially affected by coastal change. In their representation on the local plan the Environment Agency recommended this as the appropriate course of action.

The Coastal Change topic paper concluded that the CCMA boundaries should be defined by using both the Plymouth University and the NCERM evidence and the most landward boundary should be taken to define the extent of the CCMA, in accordance with the advice of the Environment Agency. The only exception to this approach was in the vicinity of Cliff Road, Sidmouth, where it was recommended that the NCERM was used to define the boundary. This designated a far smaller area of land than identified by the Plymouth work and was justified on the basis that key decisions on the beach management plan happened after the conclusion of the Plymouth work. Sidmouth had been subject to detailed study and analysis in the recent past that justified taking a localised approach in this area. The line was very similar to that shown in the previous consultation plan, which was based on the beach management plan, but using the NCERM mapping overcame criticisms of the evidence underpinning the beach management plan.

Members were asked to consider revisions to Policy AR03. The proposed changes made it clearer that the implementation of coastal management schemes would be taken into account when determining when coastal change could be expected, alongside NCERM and the University of Plymouth work. Changes had also been made to simplify the text in relation to what kind of development might be acceptable according to when coastal change was expected. The proposed change to clause E made the policy compliant with national advice.

Officers were thanked for their report and for reviewing the coastal change areas.

RESOLVED: that Strategic Planning Committee endorse the officer recommended changes to the CCMA boundary and related plan policy as set out in the report.

27 **Response to Dorset Local Plan Options Consultation**

The Assistant Director – Planning Strategy and Development Services' report outlined the key issues arising from the Dorset Council Local Plan Options Consultation 2025 that were of relevance to East Devon District Council. It sought agreement on a formal response to be submitted to Dorset Council, focussing on cross-boundary matters including housing growth at Lyme Regis, landscape and infrastructure impacts, and shared environmental designations such as the Jurassic Coast World Heritage Site and National Landscapes.

Key issues for East Devon included:

- Growth at Lyme Regis and impact on Uplyme.
- Housing numbers and infrastructure.
- National landscapes and the Jurassic Coast.
- Flexible settlements policy.
- Strategic heathland recreation migration.

The full proposed response to the consultation was included in the report and addressed the consultation questions which were of relevance to East Devon:

- Q3: Settlement hierarchy.
- Q8: Infrastructure delivery.
- Q12: Flexible settlements policy.

RESOLVED:

1. that Strategic Planning Committee agreed the proposed response to the Dorset Council Local Plan Options Consultation 2025 as set out in paragraph 3.2 this report and authorised the Planning Policy team to submit it to Dorset Council.
2. that Strategic Planning Committee give delegated authority to the Assistant Director-Planning Strategy and Development Services in consultation with the Portfolio Holder for Place, Infrastructure and Strategic Planning to agree a Statement of Common Ground with Dorset Council covering the issues set out in this report.

Attendance List

Councillors present:

K Blakey
O Davey
P Hayward
M Howe (Vice-Chair)
B Ingham
G Jung
D Ledger
T Olive (Chair)
H Parr

Councillors also present (for some or all the meeting)

P Arnott
I Barlow
R Collins
P Faithfull

Officers in attendance:

Ed Freeman, Assistant Director Planning Strategy and Development Services

Damian Hunter, Planning Solicitor
Andrew Melhuish, Democratic Services Manager

Chris Knott, Consultant
Simon Phillips, Consultant

Councillor apologies:
C Brown
P Fernley
Y Levine

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

Date of Meeting 25 November 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

East Devon Local Plan – Second stage of Regulation 19 consultation

Report summary:

This report seeks committee approval for the 2nd stage of consultation on the East Devon Local Plan, under plan making Regulation 19. Subject to committee approval the recommendation is that consultation will start on Friday 28 November 2025 (or as soon as possible after this date) and will conclude at midday on Monday 26 January 2026.

Appended to this report, in tracked changes format and showing amendments made to the plan consulted on at the 1st stage of consultation, is the redrafted local plan text. We will invite comments on this redrafted plan, which will be accompanied by a new Policies Map. We will encourage those commenting to specifically make comment on changes made to the plan, i.e. new text added, text deleted and changes to the Policies Map

Once comments have been collated a summary feedback report will be produced which, along with the corresponding report for the 1st round of Regulation 19 consultation, will be submitted with the plan, supporting evidence and paperwork for plan examination. Submission is likely to be in Spring 2026, at which point the examination starts. As part of the examination we would expect oral hearing sessions to be held later in 2026 or in 2027. Plan adoption, we would expect, will be in 2027.

A series of new/additional technical reports are referenced and commented on in this committee report and these reports have been used to help refine local plan wording. Also, the overall local plan evidence base has been updated where new or updated evidence reports have been completed.

This report in addition sets out details of the Infrastructure Delivery Plan and Statements of Common Ground and also details on how we plan to run the consultation on the plan and more details on the plan examination and subsequent adoption. Supporting the plan is a new Statement of Community Involvement that updates the existing statement and which committee are recommended to adopt.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

1. **That Strategic Planning Committee approve the revised local plan text and Policies Map for consultation and agree to the 2nd round of Regulation 19 consultation starting on, or as soon as possible after, the 28 November 2025 and on this basis for consultation to conclude on 26 January 2026.**

2. **That Strategic Planning Committee grant delegated authority to the Assistant Director – Planning Strategy and Development in consultation with the Portfolio Holder for Place, Infrastructure and Strategic Planning, to make minor amendments to the local plan text and Policies Map to finalise formatting and to correct any factual errors and address inconsequential anomalies in order to finalise the plan ahead of the start of consultation.**

3. **That Strategic Planning Committee endorse the draft Infrastructure Delivery Plan and to approve it to form part of the overall material that supports and is available at the time the local plan consultation commences.**

4. **That committee note the ongoing work on production of Statements of Common Ground and grant delegated authority to the Assistant Director – Planning Strategy and Development Management, in consultation with the Portfolio Holder for Place, Infrastructure and Strategic Planning, to finalise these statements and send them out to signatory partners seeking their comments/feedback and agreement.**

5. **That Strategic Planning Committee agree to adopt the updated Statement of Community Involvement and agree to its use forthwith.**

6. **That a further report on the Water Cycle Study be brought to Strategic Planning Committee following consultation to enable discussion of its implications with the benefit of responses from consultees and further engagement with South West Water.**

Reason for recommendation:

To ensure the local plan can proceed to the next stage of consultation and thereafter to examination.

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

Climate change Medium Impact

Risk: Should Committee determine to not proceed with the next stage of consultation in a timely manner the plan may fail to meet process and timing relevant requirements and the plan may not be able to progress onto examination and thereafter adoption.

Links to background information Links are contained in the body of the report.

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

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1 Summary of stages undertaken to get to this point

1.1 Over recent years Strategic Planning Committee has received a considerable number of local plan related reports that have seen the plan evolve and develop. These started from before the first stage of public consultation, an Issues and options report consulted on in early 2021, through to what we plan to be the final stage, prior to plan submission for examination, of public consultation.

1.2 Local Plan making regulations The Town and Country Planning (Local Planning) (England) Regulations 2012 set out a series of steps and matters that need to be complied with when producing a local plan. Earlier this year we undertook the 1st stage of consultation under Regulation 19 of the regulations. At this 2nd stage of Regulation 19 consultation the Council should be satisfied that it has a fit and sound plan that can be submitted for examination.

2 The role of the 2nd stage of Regulation 19 consultation and format of the consultation plan

2.1 Strategic Planning Committee on 2 September 2025 received a report Agenda for Strategic Planning Committee on Tuesday, 2nd September, 2025, 10.00 am - East Devon (item 15) setting out a series of what are more substantive changes to the local plan and also details about the 2nd stage of consultation.

2.2 On the 30 September 2025 committee received a local plan related report Agenda for Strategic Planning Committee on Tuesday, 30th September, 2025, 10.00 am - East Devon specifically about the new community of Marlcombe and related matters, including transport and access. There was also a report about Coastal Change Management Areas.

2.3 This report carries material/changes agreed at these meetings forward into a revised draft of the plan and the local plan also includes additional, less significant changes, that:

a) Address a limited number of identified gaps in policy coverage from the plan at the 1st round of Regulation 19 consultation.

b) Refine and adjust some policies in the light of new evidence coming through or matters raised in consultation feedback that are seen to justify plan amendments.

c) For housing and employment data and referencing a change of base date data on past completions and commitments to development (on account of planning permissions granted) to move from a base date position in the 1st Regulation 19 plan of 1 April 2024 to a new base position of 1 April 2025.

d) Correct factual or grammatical errors and update now dated references or information. Plus formatting improvements have been made.

2.4 In the new draft of the local plan there are therefore a number of minor adjustments throughout text though there are no substantive changes to the intent or broad coverage of policy. The most significant changes are made in respect of Policy in the plan for the new community (2nd after Cranbrook) as now named and referenced in the plan as Marlcombe. The key intent of running the 2nd stage of consultation was specifically to address new community/Marlcombe plan policy.

2.5 The changes made in the plan text are shown by way of tracked changes – with new text shown in coloured font and underlined and deleted text shown with a strike through ~~(strike through)~~. In the public consultation draft of the plan we will seek to ensure that changes are made in visually clear and prominent manner. The new draft of the plan text is appended to this committee report and it is this draft (subject to any final tidying up, as sought in committee recommendation) that we will consult on.

2.6 To explain the reasoning behind plan changes (i.e. the new text added and deletions made) we will produce a schedule of changes, that will accompany the plan at consultation that cross references to the changes identified in the local plan text and provides reasoning and justification for the changes made. For this committee report the justification for changes made appear in comments in the document itself – we will seek to rationalise these for consultation so that in the consultation material comments on changes are grouped together, by policy or blocks of text, and not set out on a line by line or paragraph by paragraph basis. It should be noted that for very minor changes such as correcting spelling or grammatical errors and standardising use of acronyms we do not reference changes (though they can be seen by the reader). Likewise we do not reference formatting changes where these have been added to make the plan more legible. Changes referenced are therefore in respect of matters of some or greater substance.

2.7 The schedule justifying changes will sit alongside the plan and be available at consultation. There are no significant changes to the plan from the 1st Regulation 19 draft to the 2nd Regulation 19 draft - for further information see detailed commentary in the report to Strategic Planning Committee on 2 September 2025 2. Local plan assessment of potential plan changes V2.pdf

3 Local Plan Policies Map

3.1 The local plan text, and specifically the policies within it, cross-references to the Policies Map of the plan. The Policies Map sets out, in spatial terms, the locations where policies do and do not apply. Noting that many policies are applicable across the whole of the district, or in some cases large parts of it (for example within National Landscape designated areas) and others are very much more localised, for example specific land areas allocated for development.

3.2 We will be publishing a brand-new Policies Map, rather than seeking to have a map that shows the 1st Regulation 19 Policies Map with changes identified on top of these for the 2nd Regulation 19 consultation. For text documents showing changes from one version to the next works well with track-changes. However, for mapping it is much more complicated and confusing to display previous and new versions of boundaries and areas in a visually clear and obvious manner, that is unless changes are very minimal. Hence producing a brand-new Policies Map with only definitive current policy lines only. However, we will also ensure that the Policies Map from the first round of Regulation 19 consultation is still available, albeit we will add a watermark or other 'health-warning' to advise that it is superseded by the new map.

3.3 The new Policies Map can be viewed at: Local Plan 2020 to 2042 Policies Map (Second Reg 19 Consultation). Changes made to the policy map between the first and second Regulation 19 versions of the plan relate to:

- The omission of allocations at Axminster (Axmi_01a), Honiton (Honi_12) and in the West End (Brcl_26);
- Changes to the settlement boundaries to reflect allocation changes, planning permissions, SPC resolutions and the Bishops Clyst neighbourhood plan as set out in the revised settlement boundary topic paper;
- Deletion of areas under Policy CC03: Promoting low carbon and renewable energy that were shown as appropriate for wind farms – such areas are no longer spatially defined on the map;
- Changes to the Coastal Change Management Areas described in the revised CCMA topic paper;
- Designated Neighbourhood Areas layer brought up to date to include Plymtree;
- Parishes, Mineral Safeguarding Areas, Lower Otter Restoration Project and Dorset & East Devon (Jurassic) World Heritage Site layers added;
- Layers no longer categorised as 'Local Plan Policies' or 'For Information Only'. The layers remain we just remove these classifications.

4 The period for plan consultation

4.1 Assuming committee at this meeting (on the 25 November 2025) endorse the plan for consultation, and on assumption it is done so without the need for substantive changes that will be time consuming to complete, the intention is that consultation will start on Friday 28 November 2025. The regulations require (an at least) six-week

period of consultation. However, timing is such that we will run over the Christmas and new year period so it proposed that we run consultation for eight weeks. On this basis consultation would be planned to conclude, suggested at 12:00 noon, on Monday the 26 January 2026. If we can start consultation sooner than the 25 November then we would seek to do so, but timing will inevitably be tight.

4.2 If Committee have concerns over consulting over the Christmas period we could consider starting the consultation in the new year, for example in early January 2026 and running for six weeks closing in mid February 2026. Reflecting on what may (or may not) be seen as a reputational matter (despite the fact it gives people longer to respond) Committee may wish to consider if a date in the new year is a better point at which to start consultation. However, it is pointed out that this would delay plan making and plan submission for examination and prejudice the potential to meet deadlines.

5 The form consultation will take and the consultation portal

5.1 When the local plan goes out for consultation it will be open for anyone to say whatever they want on whatever part of it they wish to comment on. Though we will encourage people to comment on changes only, stressing that all original comments made at the 1st Regulation 19 consultation and the associated feedback report we produced will be available for the inspector/s at plan examination. We cannot, however, insist that people make comments on changes only (and disregard them if they do not), though in designing feedback forms we will stress the above and provide a clear 'nudge' along the lines of encouraging comments on changes only. In so doing we do recognise, however, that changes in one part of the plan may lead to 'knock-on' or associated impacts elsewhere, even if the elsewhere bits are not explicitly changed, so it is important that people have scope to make wider comment. These observations are made in the context of advising that there will be no merit in hearing exactly the same matters raised at the 2nd stage of consultation as were raised in the 1st stage of consultation, in so far as it will not help the inspector/s at examination.

5.2 As with the 1st stage of consultation we will be putting the plan out on the Commonplace consultation portal. The portal will include a series of questions, based on the Planning Inspectorate recommended form for consultation, that we will ask people to respond to. The Consultation Portal will display the new plan text (in similar way as we did at the 1st Regulation 19 consultation) and we will also have links to the Policies Map.

6 Communications on the consultation

6.1 The Statement of Community Involvement (SCI) sets out the policy for consulting the community, and anyone else interested in planning, on planning policy documents and planning applications in East Devon. The SCI sets out the publicity and consultation procedures that we will use, explains the statutory requirements that we must meet at each stage of plan making and what other methods may be undertaken in addition to

these minimum requirements. We must comply with the adopted SCI in preparing relevant planning policy documents and in determining planning applications.

6.2 An updated SCI has recently been produced, appended to this report, replacing the previous January 2020 version. This revision to the SCI incorporate a small number of factual updates arising from national changes to planning policies and procedures and revised contact details to bring the SCI up to date. It is a very light touch review but does include a longer introductory text which explains the different roles of Members and Officers as this was felt to be useful in previous local plan feedback. Members are asked to adopt the updated SCI as proposed.

6.3 With regard to communications on the proposed 2nd Reg 19 consultation a draft communications plan is appended to this report for members information setting out how engagement will be undertaken.

6.4 We plan to run an online workshop for Town and Parish councils through which we will set out what we are consulting on and why and through which we will encourage people to respond in the most productive way. This is in respect of changes made to the plan as opposed to repeating submissions on matters that they and others have already commented on.

6.5 We would not plan or expect to run any in person events or exhibitions. They are very time consuming to organise and have significant staffing implications and the nature of the consultation, specifically majoring on plan changes, does not readily lend itself to such events.

7 Supporting evidence to the local plan

7.1 Committee will be aware that the local plan is supported and informed by a substantial body of supporting evidence. Studies have been produced and work has been ongoing since the Issues and Options consultation in 2021 and indeed some evidence precedes this date.

7.2 The evidence we have gathered has informed the plan and its changes and it has also been complemented by additional work arising from feedback we have received through consultation. We have an on-line evidence library – Evidence and Examination Library - East Devon, that the local plan cross references to. All evidence documents (existing and new ones) and work that supports the plan is documented in this library.

7.3 In some cases, as noted in plan changes, we have updated documents that supported the 1st Regulation 19 consultation. We have also added documents that were not used or cited in the 1st consultation draft of the plan.

7.4 There are also cases where there has been ongoing refinement and assessment work (also in the plan library) that sits alongside and informs local plan content and production as it proceeds through various iterations and drafts. Specific assessment work includes:

a) **Sustainability appraisal** – this is required under plan making regulations and is an exercise in assessing emerging and evolving (and final) plan policy against a series of sustainability objectives. It helps with informing and refining plan policy from one iteration to the next. An updated sustainability appraisal report will accompany the plan at consultation and we will also invite comment on it.

b) **Assessment under the Habitat Regulations** – we have ongoing overarching local plan work undertaken by Footprint Ecology that has tested and helped refine plan drafting. We also have a specific technical report, that has informed this overarching report, on air quality matters that is referenced further on in this committee report.

c) **Equalities Impact Assessment** – this report considers equalities considerations in respect of local plan preparation process and plan content. No negative impacts are identified towards any groups with particular protected characteristics. There are positive benefits to particular groups - for example from policies which provide sufficient pitches to meet the needs of Gypsies and Travellers, require adaptable and/or accessible homes, permit self-build plots (designed to meet occupants requirements), older persons housing, affordable housing and the requirement for employment and skills statements (which will be of particular benefit to young people) - as well as policies requiring particular infrastructure and facilities to serve the whole community.

7.5 Earlier drafts of the above work have been updated, and this work has informed changes in the new Regulation 19 plan.

7.6 New evidence documents have been completed in the run up to and made ready for this next 2nd stage of Regulation 19 consultation. These documents, along with other relevant evidence documents, will be included in the local plan evidence library Evidence and Examination Library - East Devon and will be referenced in the local plan text. We would specifically highlight the following work and reports as produced for the council by consultants or produced internally by officers. It is stressed that we briefly summarise just some aspects of what these reports address:

a. **Technical reports in respect of Marlcombe** – committee received a series of reports on the 30 September 2025 see item 25 Agenda for Strategic Planning Committee on Tuesday, 30th September, 2025, 10.00 am - East Devon. Relevant reports, that sit behind and justify plan policy, will be cited as evidence in the local plan.

b. **Highway and transport assessment** – complementary to and adding to the Marlcombe specific work the council, in conjunction with neighbouring authorities, has commissioned a series of reports that assess impacts on the strategic road network (specifically the M5 motorway and its junctions) and the local road network that arise from local plan development proposal. This work has led to a series on engineering road improvement proposals and green travel schemes and initiatives to be implemented as local plan development progresses.

c. **Pebblebed Heaths air quality reporting** – as part of assessment work under the Habitat Regulations a specific concern was identified in respect of the adverse impacts that vehicle exhaust fumes have on the Pebblebed Heaths and the increased loading that will arise from additional development. This work assesses the scale and nature of the concerns and potential mitigation - see further commentary below the bullet point listing.

d. **Water cycle study** – this work examines the capacity and operation of the potable and foul water infrastructure in East Devon and capacity issues relevant to accommodating new development - see further commentary below the bullet point listing.

e. **National Landscape paper** – This technical report informs many of the policy wording refinements to allocations in the local plan. It was produced noting that there were challenges from the first round of local plan consultation to some sites allocated in the plan that were in or adjacent to a National Landscape.

f. **The revised flood risk topic paper** – This work assesses flood risk considerations at sites allocated in the local plan and includes sequential and exception testing where necessary and was first published in February 2025, after the start of consultation for the first Regulation 19 plan. It has been updated to include further Strategic Flood Risk Assessment work undertaken over the summer that has considered the implications of updated National Flood Risk Assessment mapping and provided additional evidence for site allocations.

g. **The self-build topic paper** – Self and custom building housing is promoted by Government and this is a new paper that sets out evidence to support Policy HN05: Self-build and custom build housing.

h. **Archaeological assessments** – in support of local plan allocations and to address concerns raised by Historic England and the archaeological team at Devon County Council archaeological assessments have been undertaken at Axminster, Clyst St George and Seaton - see further commentary below the bullet point listing.

7.7 **Pebblebed Heaths and air quality** – a concern highlighted in initial Habitat Regulations Assessment work was in respect of increased levels of vehicles travelling across the Pebblebed Heaths, on account of additional development, and the adverse impact of increased exhaust emissions. The major concern (in lay person terms) is that exhaust fumes from internal combustion engines (fuelled by petrol or diesel) lead to increased nutrient levels in soils on the heaths and these lead to too much of the wrong type of vegetation growing and this outcompetes the growth of the right type of vegetation. This has been identified as leading to negative impacts that run counter to conservation objectives for this site, noting that the site falls in the highest tier of nature conservation designations in the United Kingdom. The Habitat Regulations set out legal consideration where adverse impacts that might impact on site integrity arise.

7.8 To more fully understand the nature of impacts and potential approaches to mitigation the Council employed consultants Ricardo to undertake a technical assessment of issues and to outline potential approaches to mitigation. Their work is appended to this report and also available in the local plan evidence library. The problems that exist have a degree of being shorter-term as opposed to being longer term given that there will be a marked shift to electric powered vehicles. As a result concerns can be expected to greatly diminish over time. In local plan policy redrafting a specific emphasis is placed on promoting electric vehicle use, this is especially so in respect of encouraging residents of new housing to have electric powered cars and vans (as opposed to internal combustion engine ones). Revised policy, for example seek high quality solar power generation and plug-in technology in new developments. Policy redrafting also includes greater referencing to measures to be taken in respect of ensuring assessment processes (under the Habitat Regulations) are appropriately undertaken to allow for development to commence. Changes also highlight the importance of monitoring to review changes and occurring alongside this, and running a parallel, is a break clause that would allow for pausing of development and review of mitigation in the light of conclusions drawn.

7.9 The intent is that ahead of and to support plan submission a detailed mitigation strategy will be finalised and this will set out more detail on promotion of and transition to electric vehicles and also other mitigation measures to address adverse impacts that would otherwise arise.

7.10 **Water Cycle Study** – the consultants, Haskoning, have delivered the final water cycle study. This is appended to this report but is also available in the local plan evidence library.

7.11 The Water cycle study advises that it *"….outlines the essential considerations for managing water resources, wastewater, and environmental conservation considering projected development across the district. Its evidence-based observations and recommendations aim to steer East Devon towards a future where growth and sustainability coexist equally, ensuring that water management practices enhance rather than compromise the natural and built environment."*

7.12 The Water Cycle Study advises, by way of key findings:

- ***"Water resources and water management****: Future developments are likely to stress the water management units of Otterton, Fairmile, and Fenny Bridges. Specifically, surface water availability in these management units is likely to be impacted and result in a future water deficit in East Devon. SWW have developed a Water Resources Management Plan (WRMP), that sets out how the company plans to overcome the predicted deficit, pointing towards a need for strategic planning in water supply and quality management.*

- ***Wastewater management****: Three critical areas are identified as being at high risk from nutrient loading due to the increases in wastewater production from proposed housing developments: the River Exe Estuary, the River Axe, and the Otter Estuary. These areas are vulnerable due to direct effluent discharges or cumulative effects from multiple sources, exacerbating existing problems like*

phosphate pollution. Infrastructure enhancements and continued rigorous planning are recommended to handle the increased wastewater and sewage loads expected from new developments.

- ***Biodiversity and conservation****: The WCS emphasises mitigating potential negative impacts on biodiversity, especially in designated conservation sites like the River Exe Estuary, the River Axe, and the Otter Estuary. The WCS recommends that any future Habitat Regulations Assessments (HRAs) specifically consider the vulnerability of the Exe Estuary and River Axe to high nutrient levels input from various sources, including sewage treatment works (STW) and agriculture. The WCS also advises on monitoring and further testing to assess potential increases in nutrient discharge and contaminants from wastewater treatment works (WwTWs) and surface runoff.*

- ***Policy recommendations****: Among the key suggestions are the continued adoption of stringent water efficiency standards, closely monitoring water resource applications, and barring developments that could harm water quality or green infrastructure. The WCS advocates a comprehensive approach, integrating water-efficient practices within the local plan to support sustainable growth in East Devon."*

7.13 The policy recommendations referred to in the report have been incorporated into the draft Local Plan and it is now proposed to consult on the study and the plan. It is not envisaged that the plan will need to change following this since it has been produced following the evidence which is robust. However it is acknowledged that the study raises wider questions around the water environment, the role of South West Water and work with bodies such as the Environment Agency and Natural England on addressing water quality and bio-diversity. It is proposed that a further report on the water cycle study be brought to the committee following consultation to enable Members to discuss these wider implications of the study and how these are taken forward. In the meantime it is also intended to work with South West Water to develop a clear narrative for the upgrading of water infrastructure in line with housing delivery trajectories and it is hoped that a future report can also provide an update on this work.

7.14 Archaeological assessments – the further archaeological assessments undertaken, with commentary on findings, are set out below.

7.15 **Axminster** - The mixed-use allocation south of Axminster (Axmi_02, 08 and 09) is adjacent to a Scheduled Ancient Monument (SAM). An archaeological investigation is being undertaken for the land closest to the SAM in Axmi_02 and Axmi_08.

7.16 The archaeological work undertaken to date has demonstrated that there is a concentration of archaeological deposits, associated with the Romano-British settlement, along the northern edge of allocation site Axmi_02, and the concentration of archaeological remains seems to diminish to the south. The archaeological team at Devon County Council advise that this northern part of this allocation area is not developed and is preserved in situ, perhaps used as public open space containing

appropriate heritage information to enhance and better reveal the significance of the site as a significant heritage asset. The extent of any such protected area will need to be based upon a consideration of the results of the field evaluation, which is not yet complete. The county council advise that an interim summary report shows that, in principle, access can be taken from Musbury Road into the site and that any impacts on heritage assets with archaeological interest can be mitigated by a programme of archaeological work to investigate and record the heritage assets prior to any development/construction work taking place in this area.

7.17 Revisions have been made to the policy wording to reflect the significance of the archaeological interest on the site. No archaeological investigations have been undertaken for Axmi_09, but a geophysical survey is scheduled to commence in the middle of November. The archaeological team at Devon County Council maintain its objection to this part of the allocation until the results of this survey and any intrusive field evaluation that may be required.

7.18 **Clyst St George** - The employment allocation (Clge_25a) at Darts Farm was highlighted by DCC as potentially affecting a prehistoric/Romano British enclosure. Further investigation has confirmed that any impact upon heritage assets with archaeological interest can be mitigated by a programme of archaeological work secured either (i) by the submission of a written scheme of investigation submitted in support of any future planning application or (ii) by the application of the two usual archaeological conditions to any consent that may be granted and so it is proposed that the site continue to be allocated subject to further investigatory work at planning application stage.

7.19 **Seaton** - The housing allocation Seat_13a is adjacent to the site of a Roman villa, which is a Scheduled Ancient Monument (SAM). A geophysical survey has been commissioned and this and associated assessment has been forwarded to Historic England for comment. Whilst we do await formal feedback the working assumption is that the site is likely to be fit for allocation in the local plan, though final policy wording amendment (under delegated authority) may in due course be needed and additional assessment work may be needed at a possible planning application stage.

8 Infrastructure Delivery Plan

8.1 The successful implementation of the local plan will require the delivery of infrastructure alongside and necessary to support new development coming forward. We have an Infrastructure Delivery Plan that has evolved through various drafts and iterations that establishes infrastructure that is identified as needed. This infrastructure plan can evolve as plan making progresses and can be adjusted after the plan is adopted. At plan examination the inspector/s will, however, want to understand expected infrastructure needs generated by the plan and proposals with it and means to secure their implementation.

8.2 Appended to this committee report is the current draft infrastructure plan. This plan (with scope for updating as noted) will form part of the package of material that sits alongside the local plan at its 2nd stage of Regulation 19 consultation. It should be

noted that there is also a separate Infrastructure Delivery Plan for the new community of Marlcombe. In due course we will look to potentially combine these two plans/documents into one.

9 Statements of Common Ground

9.1 As part of the plan making work, we have a 'duty to co-operate' with a number of agencies and bodies, specifically including neighbouring local authorities and statutory Government agencies. This duty requires that we work with them to understand and address matters that have a cross-boundary impact or relevance on matters that maybe of strategic importance.

9.2 The first Regulation 19 plan was supported by a duty to co-operate statement that summarised the key issues, described how they had been addressed and identified outstanding issues, together with how they could be resolved. A report updating the issues and identifying key actions was considered by this Committee on 2nd September. Through plan preparation the topics of housing, climate change, employment, transport, infrastructure, water quality, biodiversity, habitat mitigation, landscape and seascape and site allocations have been identified as the relevant strategic cross boundary issues. These issues are interlinked to varying degrees. To support the second Regulation 19 consultation, we will update the duty to co-operate compliance statement and also produce 'Statements of Common Ground' (SoCG) as evidence of effective joint working on cross-boundary strategic matters in accordance with the NPPF. National planning guidance states that "*Authorities are expected, wherever possible, to detail cooperation in a single statement. They may feel it is appropriate to produce more than one statement if they feel this would be the clearest and most expedient way to evidence joint working. This will depend on the matters being addressed and authorities and bodies cooperating with each other. For example, multiple statements may be appropriate where authorities work in different groupings to address certain strategic matters*".

9.3 Approaches to the production of SoCG vary. For example, the Yorkshire Dales National Park recently submitted a plan supported by one SoCG that included a table showing which organisations were involved with which strategic matters. In contrast, Teignbridge submitted 19 SoCG and Exeter have submitted 11, all based on different bodies rather than topics. We have found that the clearest way to deal with strategic cross boundary issues in plan preparation has been to focus on topic areas. These can involve multiple organisations or just one. Based on the work undertaken so far, it makes sense to continue the topic based approach, but there are clearly topics that benefit from joint consideration, such as housing and employment. To keep the number of SoCG to a minimum, in addition to the overarching duty to co-operate statement, we are drafting 3 statements of common ground to cover:

- site allocations, housing and employment;
- transportation; and
- environment and infrastructure (to deal with all other topics).

These will be circulated to the relevant partner bodies seeking their consideration and signature in parallel with the plan consultation.

9.4 The duty to cooperate does not amount to a duty to agree on matters, and it is common for there not to be agreement. The statements of common ground will however highlight where there is agreement and therefore a common position and set out and establish where there are differences of opinion. Inspector's will use the statements to assist with plan examination.

9.5 At the time of plan submission we will look to potential revisions and new versions of these statements.

10 Relationship with neighbourhood planning

10.1 This final Regulation 19 stage of consultation and forthcoming submission is significant for neighbourhood planning in that it marks increased clarity and certainty about plan content. Made (adopted) neighbourhood plans, of which there are now 28 in the district, will remain part of the statutory development plan when the new Local Plan comes into force. As stated in the draft plan, it is not intended that it will supersede existing neighbourhood plans, rather that the two will be read together in the consideration and determination of applications. However, where there is a conflict between the two; where policies in the Local Plan are 'strategic', and/or; based on more recent evidence, they will inevitably take precedence / carry greater weight than neighbourhood plan policy.

10.2 Neighbourhood plans submitted before the new Local Plan is adopted will continue to be examined for their general conformity with the strategic policies of the adopted Local Plan, but the relationship with the emerging plan is an increasingly important consideration. Once the new Local Plan is adopted, they will need to be prepared in general conformity with its strategic policies. There are however numerous opportunities referred to in the draft new Local Plan where neighbourhood plans could add to, extend and tailor policy to address specific local circumstances and needs and have a meaningful role, including by:

- influencing development which may be permitted both within and beyond settlement boundaries;
- planning for additional housing and other types of development to meet identified local needs;
- influencing design of development;
- identifying key local views for protection/enhancement;
- designating formal 'Local Green Spaces';
- identifying non-designated Heritage Assets.

10.3 To retain, maximise and enhance the role of neighbourhood planning going forward, it is now an appropriate time to encourage and support communities in the production of new and reviewed and updated neighbourhood plans. A paper will be brought on this to the next meeting of this committee for discussion on how this can best be achieved, in the context of the recent cancellation of Government grant support for communities and our own budget constraints.

11 Next steps and what happens at the close of consultation

11.1 After the planned local plan consultation concludes, officers will collate responses received, including loading those not received through the consultation portal onto the portal. Depending on the number of responses received this process could take a number of weeks. Using the representations on the portal we will then download these, and using Artificial Intelligence software, generate a feedback report summarising comments received, this report will be subject to officer review. This procedure and resulting report production will replicate the work undertaken for the 1st round of Regulation 19 consultation. We will also publish the text of representations received on our Planning Policy webpages.

11.2 We would plan to bring the feedback report to Strategic Planning Committee seeking a recommendation to Council that the plan be submitted for examination. We work on the basis that there will be no further changes to the local plan and that the plan will be submitted for examination as drafted for the upcoming consultation.

11.3 The plan submission process involves sending the Planning inspectorate the plan, details of representations received (from both the 1st and 2nd stages of Regulation 19 consultation), the supporting evidence and other supporting paperwork. Submission is likely to be in Spring 2026.

11.4 On receipt of the documents, and once registered by the Inspectorate, the examination of the plan formally starts. The Planning Inspectorate will appoint one or two inspectors to examine the plan. It is, nowadays, increasingly common for two inspectors to be appointed (and whilst very unlikely for our plan it could be more than two).

11.5 To assist the inspector/s at examination with administrative and organisational work the Council are required to have a position or post of Programme Officer. This officer can be an employee of the council or an external appointee, a critical issue is, however, that they are and have been separate from and have not been involved in plan preparation. The workload of the Programme Officer will fluctuate over the duration of the examination and so it is quite common to employ an outside specialist that offers their service to multiple councils to undertake the task. However, there may be options for the Council to directly employ someone to undertake the job (ideally if they were happy to work on a very flexible contract basis) or there could be secondment opportunities if an existing council employee has a workload that fluctuates significantly (or could be allowed to fluctuate) and they were able to commit blocks of time wholly or largely to local plan work, and then have blocks of time when they do little local plan work.

11.6 The examination process will involve a number of steps and stages and even for very simple or tightly defined plans, for example covering few issues, they can be expected to last for several months/up to a year. For the East Devon Local Plan we should work on the basis that it will take over a year to complete the examination. This would take plan adoption into 2027, or beyond.

11.7 As part of the examination process the inspector/s will run a series of oral hearing sessions on matters they regard as particularly significant and on which they wish to hear more information and around which they will pose questions. Theoretically an examination could be concluded without any hearing sessions. But in reality we should assume they will inevitably happen. It can also be the case that inspectors will run an initial series of hearing sessions (perhaps if they identify a key issue or issues of concern) and then have a break (that may be lengthy – perhaps if initial hearings result in the need for further assessment work to be carried out) before subsequent sessions are held. There is a degree of discretion given to individual inspectors over how they organise and run examinations.

11.8 Before considering the 'soundness' of the plan, the Inspector/s will need to be satisfied that we have met the duty to co-operate by engaging with neighbouring authorities and other bodies constructively, actively and on an ongoing basis, in order to maximise the effectiveness of the plan preparation process. If the Inspector/s are not satisfied that the duty has been met, as happened recently in Oxfordshire, the plan will not proceed to further examination. Through the examination process the inspector/s will assess whether the plan has been prepared in accordance with legal and procedural requirements and whether it is sound. The inspectors are not, therefore, judging the plan against what they think a good or indeed excellent plan for East Devon should look like or say or what they might have written.

11.9 The National Planning Policy Framework National Planning Policy Framework at paragraph 36 advises that:

"……. Plans are 'sound' if they are:

a) *Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

b) *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

c) *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

d) *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant."*

11.10 At any point through an examination the inspector/s can raise concerns about the plan and its soundness or whether it meets legal tests (ensuring that legal tests have been met will be a starting point concern). At the extreme concerns raised by an inspector can result in a plan not being able to proceed through the examination. This happens for some plans/planning authorities, but more commonly matters raised will not lead to this result but will necessitate the council needing to do more work on the plan.

11.11 It is technically possible for a local plan to be finally adopted exactly as submitted for examination. But it is almost invariably the case that the Inspector will identify what are termed 'Main Modifications' to be made to the plan before it can be adopted. These modifications will need to be consulted on. After such consultation, and consideration of responses by the inspector/s, and then the council undertaking any other tasks identified by the inspector/s, we would hope to receive a letter advising that the Council can, subject to compliance with agreed modifications and other stipulations, adopt the plan.

11.12 Plan adoption happens through endorsement at Full Council.

Financial implications:

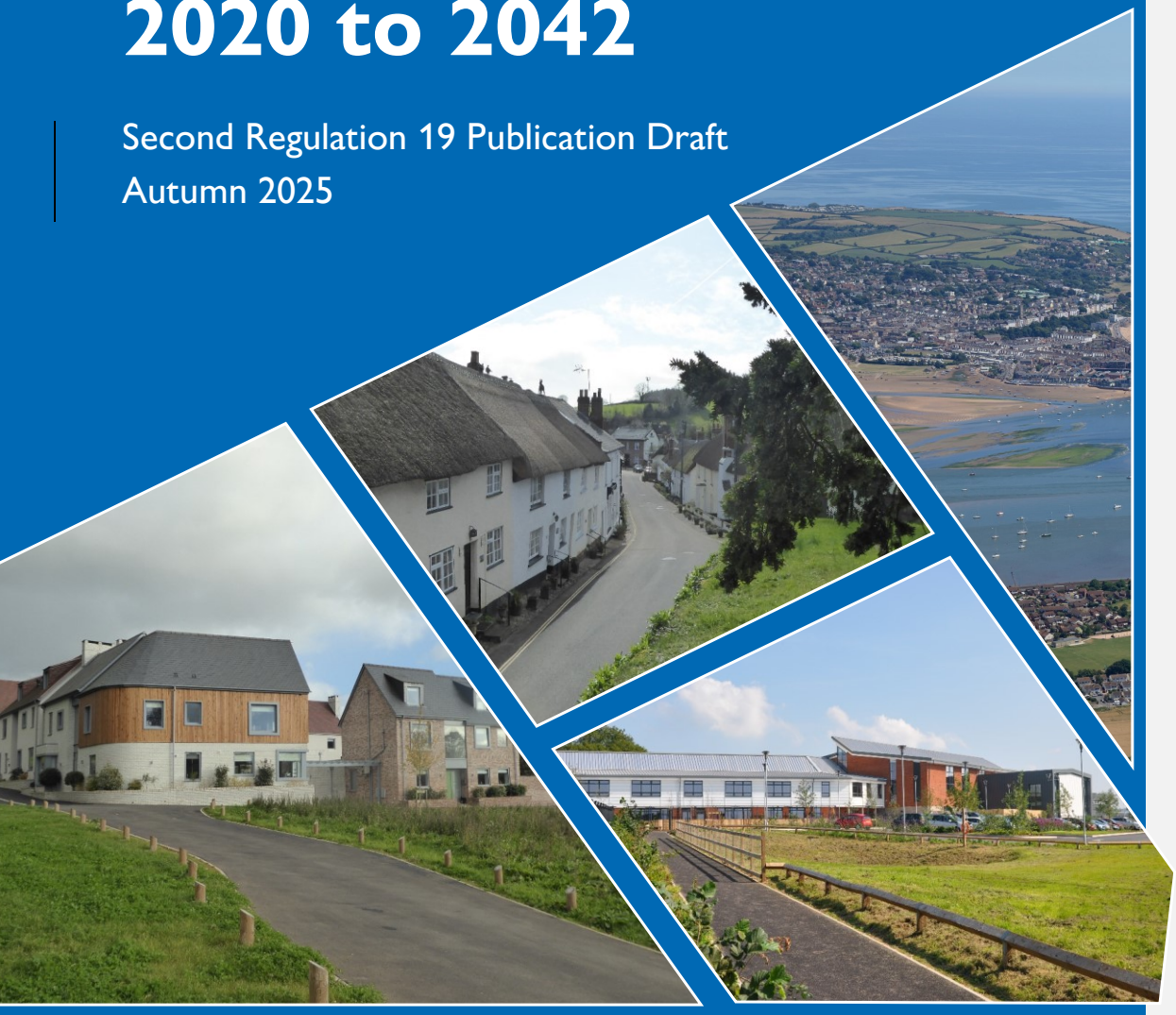
There are no direct financial implications identified within the report. (AB/11/11/2025)

Legal implications:

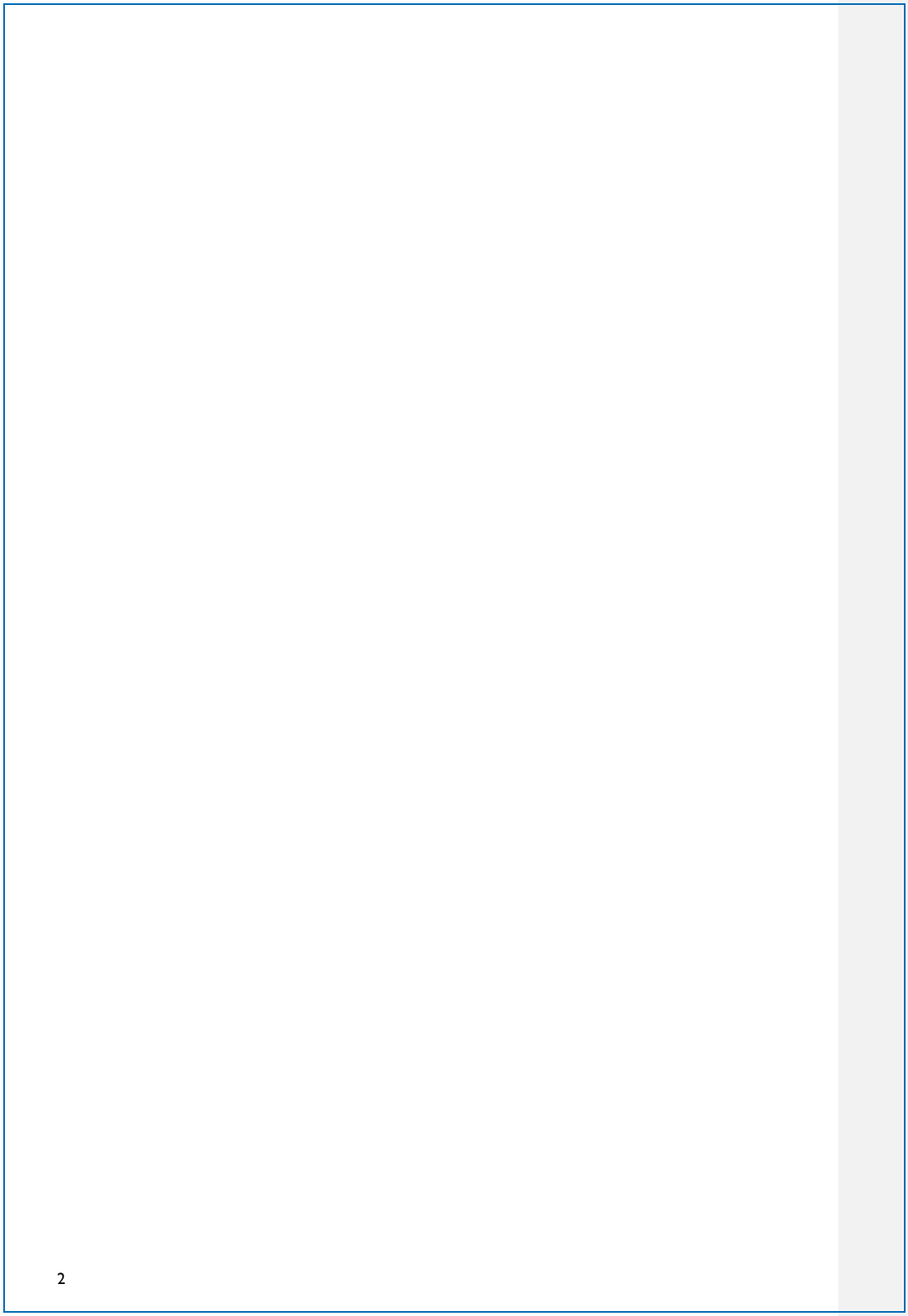
The legal implications are covered in this report (002533/14 November 2025/DH)

East Devon Local Plan 2020 to 2042

Second Regulation 19 Publication Draft
Autumn 2025



East Devon District Council


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, Marlcombe, 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 thate ~~new community~~Marlcombe is thoughtfully designed, sustainably developed, and well-integrated into the natural environment, with essential services and facilities in place from the outset.

Commented [A1]: Change made to reflect the name now given to the new community.

Commented [A2]: Change made to reflect the name now given to the new community.

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



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 ~~Thursday 13 February 2025~~ Insert date here. This will be the ~~first~~ second planned phase of Regulation 19 consultation noting that a first stage has already been completed. ~~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~~ The plan will be submitted for examination in ~~Autumn 2025~~ 2026. 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~~ introduces 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 (NPPF) - ~~(~~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~~NPPF also allows for local plans to progress and be examined under the NPPF ~~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 NPPF ~~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~~

Commented [A3]: The 'About this consultation' text below this heading has been amended to reflect the fact that we have concluded the first stage of Regulation 19 consultation and are now going into the 2nd stage.

Commented [A4]: Deletion made as plan has been redrafted.

Comments must be received by East Devon District Council (EDDC) by ~~9:00am on Monday 31 March 2025~~ insert date and time here. For more details on making comments see the Council web site = new web link to be inserted ahead of start of consultation. ~~Regulation 19 Local Plan Consultation - East Devon~~.

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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~~ On adoption the local plan will form part of the Development Plan, which ~~is the key basis for determining planning applications. The Development Plan for East Devon~~ will also include ~~includes~~ the Devon Minerals Plan and the Devon Waste Plan, ~~in addition to the East Devon Local Plan and~~ the Cranbrook Plan and any made Neighbourhood Plans.

Commented [A5]: Paragraph slightly extend to clarify what makes up the full Development plan.

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/plan text, ~~and with the exception of allocation policies that fall outside of the West End as are cases where any policy does not apply.~~

Commented [A6]: Change made above, para 1.1, makes this text redundant.

Commented [A7]: Wording simplified and text that did not make sense is deleted.

[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

Commented [A8]: Map updated to show East Devon in a national/regional context.

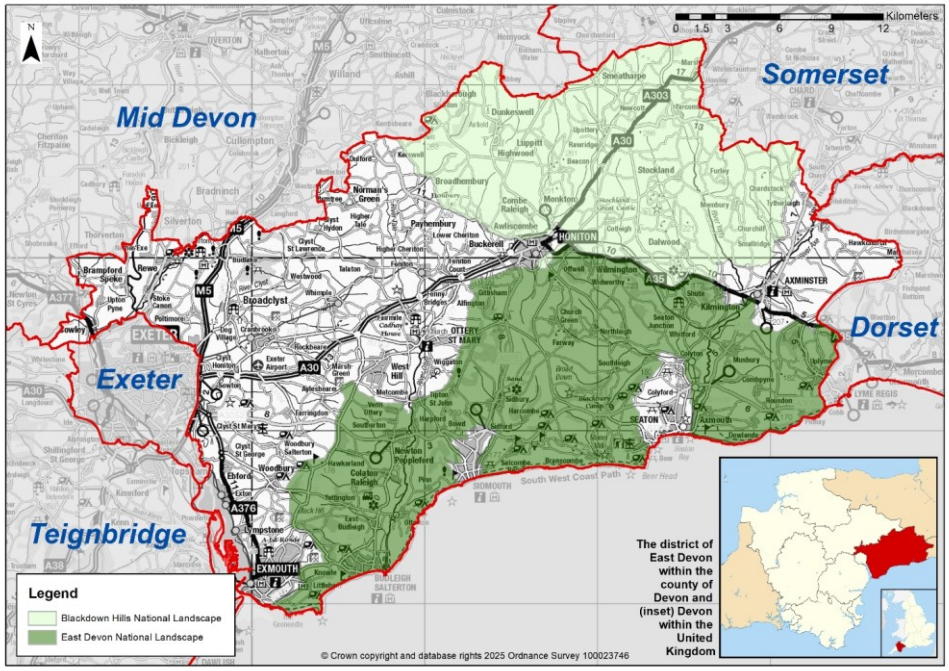


FIGURE 1 East Devon District and neighbouring authorities

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 NPPF~~National Planning Policy Framework~~.

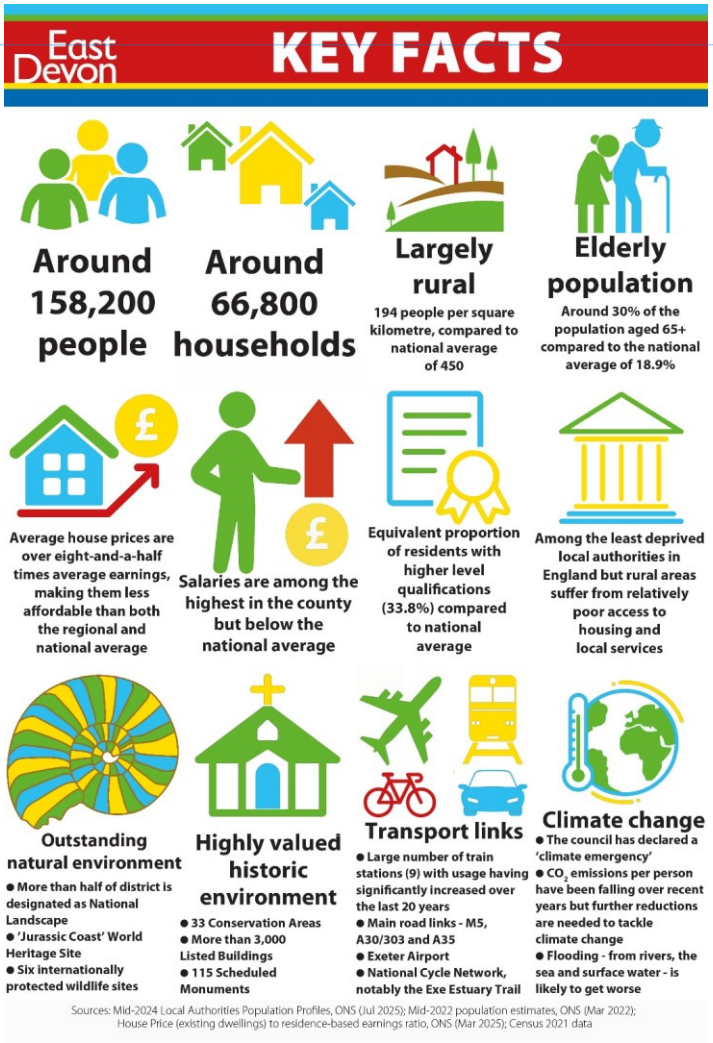
1.6. Strategic Policies set out the overarching approach and deal with major subject matters fundamental to decision-making or setting a general tone.

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.

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

1.9. [3]



[2] CSD-002(rev) – Local Plan Policies Map, New Second Regulation 19 version
[3] ~~CSD-002(rev) – Local Plan Policies Map, EDDC Local Plan 2020 to 2042 New Second Regulation 19 version~~

Commented [A9]: Infographic has been amended with up to date data.

Commented [A10]: Infographic has been amended with up to date data.

FIGURE 2 Key Facts

The role of and relationships with ~~neighbouring~~ neighbourhood planning

1.10. Neighbourhood planning is actively supported by the District Council, with 2~~8~~7 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.[4]

Duty to co-operate and joint working with neighbouring authorities

~~**1.13.**~~ Local plan making procedures requires that we work jointly with neighbouring authorities and other defined bodies and organisations. Such joint work falls under the 'Duty to Co-operate' and it has run through production of the local plan. Many of the studies and reports that justify and underpin policy content draw on joint working and commissioning of studies – these are referenced throughout the plan. Specific attention ~~is,~~ however, drawn to the overarching strategy – Our Shared Coordinates[5].

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

[5] KSD-010 - Our Shared Coordinates: A joint strategy for East Devon, Exeter, Mid Devon and Teignbridge, https://eastdevon.gov.uk/media/u44em4ub/ksd-010-our-shared-coordinates-a-joint-strategy-for-east-devon-exeter-mid-devon-and-teignbridge.pdf

Commented [A11]: Typo

Commented [A12]: Typo

Commented [A13]: Updated to say 28 pending Bishop Clyst plan being Made.

1.14. Our Shared Coordinates is a non-statutory joint strategy produced by a partnership of East Devon District Council, Exeter City Council, Mid Devon District Council, Teignbridge District Council and Devon County Council that sets out a common, cross-authority agenda, for a sub-regional spatial geography, focussed at and around Exeter, for future growth and development. Our Shared Coordinates has informed our local plan policy and that of our neighbours and has been a key work element in ensuring we meet the Duty to Cooperate.

Commented [A14]: Text added to highlight the importance in joint working in plan production and in particular to note importance of 'Our Shared Coordinates' as a strategy and evidence document.

Commented [A15]: Text added to highlight the importance in joint working in plan production and in particular to note importance of 'Our Shared Coordinates' as a strategy and evidence document.

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, Marlcombe, 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 (CVRP) 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

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 (GI), open space and recreational facilities.

2.9. Our beautiful and diverse countryside, National Landscapes (NLs), world class Jurassic ~~coast~~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.
Designing beautiful and	Objective 6	To promote high quality beautiful development that is designed and constructed to meet 21st century needs.

healthy spaces and buildings		
Our outstanding historic environment ~~built heritage~~	Objective 7	To conserve and enhance our outstanding historic environment ~~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 (EVs) ~~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.

Commented [A16]: Text amended to reflect the term used in the NPPF and to embrace all of the historic environment and not just built heritage.

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.

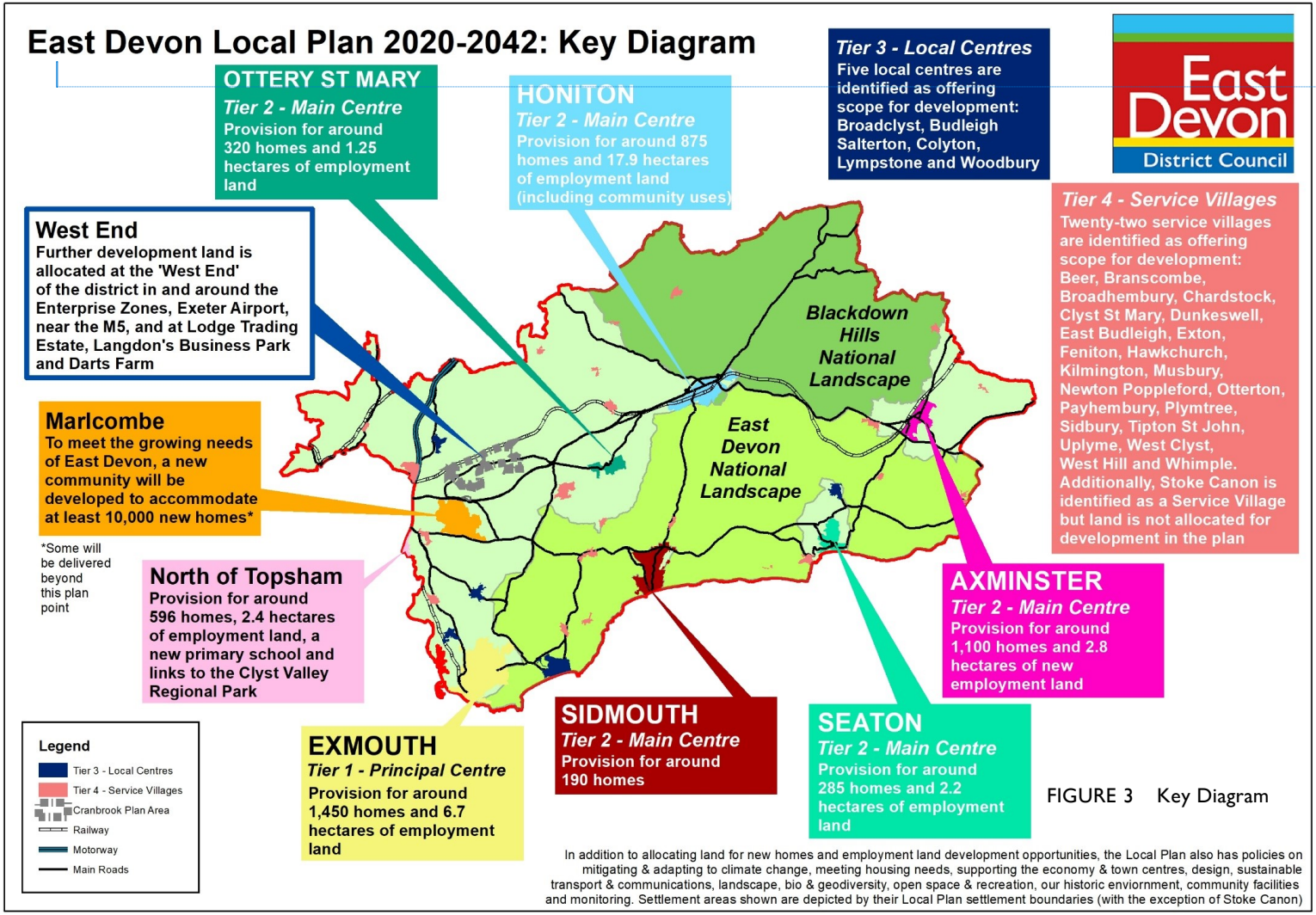


FIGURE 3 Key Diagram

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 (with the exception of Stoke Canon)

Commented [A17]: Diagram updated to reflect revised numbers and figures for housing and employment. Though individual changes to numbers are not shown as tracked changes.

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 of Marlcombe, 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 4 - Development at the West End 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

Commented [A18]: This corrects a drafting error.

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 across the whole plan area including 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.[6]

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:[7]

- 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.

[6] ~~National Planning Policy Framework~~NPPF, Dec 2023, paragraph 11a, 20a: https://eastdevon.gov.uk/media/m5ehuzzw/ksd-008-nppf_december_2023.pdf

[7] ~~GEV-001~~KSD-012 – 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

- 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.[8] 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

[8] SAL-001 – Site Selection Methodology, https://eastdevon.gov.uk/media/da4fq041/sal-001-site-selection-methodology_v2-2020-2042.pdf

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

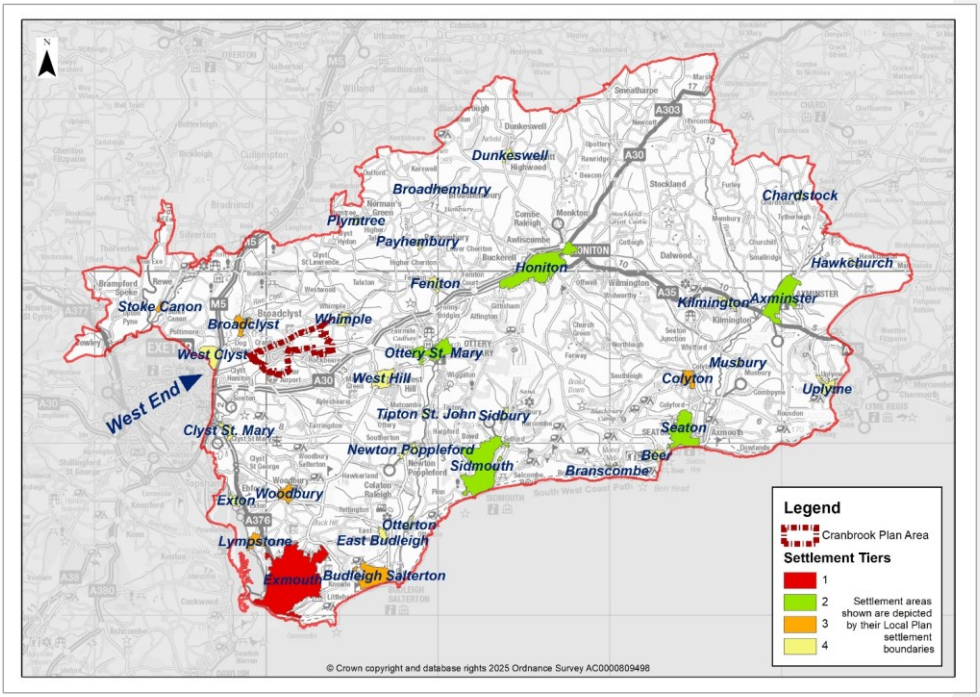


FIGURE 4 Plan showing Principal Centre of Exmouth (Tier 1), Main Centres of Axminster, Honiton, Ottery St Mary, Seaton, and Sidmouth (Tier 2), Local Centres (Tier 3) and Service Villages (Tier 4)

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. In the event of housing not being delivered in accordance with the plan and/or the identified need for new homes changing in the future, including taking account of possible unmet needs in neighbouring areas, the requirements of national policy and legislation for a review/update of the plan will be followed.

Commented [A19]: Text ensures that the future delivery of housing is properly monitored and takes account of changing circumstances, including the situation in neighbouring areas.

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 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.

This policy applies across the whole plan area including 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~~ East Devon Housing Needs Assessment 2025 shows an affordable housing need from 2020 to 2040 for 4,108 homes (current and future needs) and for an additional 1,170 homes for those in private rent but who aspire to home ownership and can afford discounted market housing products. [9].

Commented [A20]: This data comes from the latest, 2025, ORS housing needs assessment and this updates on the previous assessment.

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

[9] ~~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~~ HOU-002(rev) – East Devon Local Housing Need Assessment (Oct 2025), https://eastdevon.gov.uk/media/ojafpln0/hou-002-rev-east-devon-local-housing-needs-assessment-2025.pdf

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~~ 2025– those already built, those with permission, projected future windfalls and allocations in this plan provide for 22,943~~614~~ homes. Of these ~~3,514~~4,204 have been built which if deducted from gross projections leaves a net delivery of ~~19,100~~18,739 and a net need, with the same subtraction, of ~~17,395~~16,705. Deducting the net need from net delivery generates a 'surplus' of -2,034~~1,705~~, this figure expressed as a percentage of net need gives a healthy headroom surplus of ~~9~~12.18% that will account for any possible non-delivery.

Commented [A21]: Text updated to a 1 April 2025 (rather than 1 April 2024) base starting position for calculations.

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~~2041/42. A housing technical assessment paper provides more detail on housing numbers and provision.[10]

Commented [A22]: Typing error corrected.

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

[10] HOU-001(rev) - Housing Delivery Technical Report ~~Jan~~ Nov 2025, *new link*



FIGURE 5 New homes at Clyst St George

3.14. ~~Detailed evidence supporting this policy can be found in the 2022 Housing Need, Supply and Requirement Interim Topic Paper[11].~~ 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[12] (noting there would be a surplus of workers at the sub-regional level).

Commented [A23]: This interim topic paper is now obsolete as evidence. Plan to be supported by a new evidence paper, to be completed.

[11] ~~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~~

[12] ECN-0~~0910~~ - 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



FIGURE 6 Homes under construction.

Housing requirements in Designated Neighbourhood Areas

3.15. This strategic policy establishes minimum housing requirements for the 42 currently Designated Neighbourhood Areas (DNAs) (predominantly whole parishes) in East Devon, in line with government policy. It provides a framework for neighbourhood planning that -takes account of ~~reflects~~ the district's spatial strategy for housing development.

Commented [A24]: Minor amends for clarity / more precise wording

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:

(Please note: These figures have been recalculated based on the 2025 Monitoring Point for completions and commitments and the final housing allocations set out in this document and the detailed breakdown will be made available for the further Regulation 19 stage consultation)

Commented [A25]: To note, these figures are currently being updated to the 2025 Monitoring Point, flowing from current work on the Housing Monitoring Update (for completions and commitments) as well as to reflect final housing numbers in residential site allocations in this Plan and in Neighbourhood Plans recommended to referendum/made as at November 2025. The figures are factual and based on the previous consultation at Reg 18 and Reg 19 stage regarding the methodology. See also Appendix 2.

Designated Neighbourhood Area (as of ~~December~~ ~~2024~~November 2025, in alphabetical order)	Total (minimum) Housing Requirement (01/04/20 to ~~03~~1/03~~4~~/42) - All supply sources (completions, commitments, Development Plan Document (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~~November 2025)
All Saints	3~~2~~	0
Axminster	1,391~~1,409~~	0
Axmouth	4	0
Aylesbeare	15~~8~~	0
Beer	44	0
Bishops Clyst (Clyst St Mary and Sowton)	171~~169~~	0~~72~~
Broadclyst	2,542~~2,382~~	0
Broadhembury	37~~39~~	0
Budleigh Salterton	135~~132~~	0
Chardstock	30	0
Clyst Honiton	121~~1~~	0
Clyst St George	600~~599~~	0
Colyton and Colyford	169	0
Cotleigh	0	0
Dalwood	2	0
Dunkeswell	73~~72~~	0

Commented [A26]: Date in column header corrected from 1st April 2042 to 31 March 2042.
Also to note 2025 dates to be added throughout policy and supporting text when figures updated for 2nd Reg 19 consultation to reflect update to the 2025 Monitoring Point.

Commented [A27]: Definitive advice required for the DNAHR policy and text (para 3.18, Appendix 2 notes and supporting evidence document regarding availability of apportionment by DNA of housing numbers related to Marlcombe from the masterplanning exercise. Currently expected definitive figures will not be available and that potentially these could be added as a minor modification through the examination stage.

Commented [A28]: As part of the update, to note this figure has been moved from this column to the adjacent 'totals' column as this NP has now been formally adopted (made) by decision of EDDC Cabinet 29/10/25.

East Budleigh with Bicton	2430	0
Exmouth	2,3312,311	0
Farringdon	75	0
Feniton	127	0
Hawkchurch	17	0
Honiton	993839	0
Kilmington	59	0
Luppitt	42	0
Lympstone	350323	0
Membury	4	0
Monkton	1	0
Newton Poppleford	6276	0
Otterton	27	0
Ottery St Mary	493483	0
Payhembury	4338	0
Plymtree	4842	0
Rockbeare	747806	0
Seaton	534522	0
Sidmouth (Sid Valley)	502471	0
Stockland	3	0
Uplyme	44	0
Upottery	103	0
West Hill	7770	0

35

Whimple	611	0
Woodbury	369~~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 across the whole local plan area including 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. The policy~~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.

Commented [A29]: For syntax

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 20254 monitoring point (to 31st March 20254) 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[13] is available on the ~~East Devon District Council~~ EDDC website. Monitoring will be undertaken annually through the Housing Monitoring Update (HMU)[14]. 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

[13] HOU-014(rev) – Detailed Tables of DNA Housing Requirements by DNA, (replace with link to updated DNA_HR) https://eastdevon.gov.uk/media/0qzdlspc/hou-014-dna-hr-tables-2024-v2.pdf

[14] KSD-003 – Annual Monitoring Report, https://eastdevon.gov.uk/planning/planning-policy/monitoring/

Commented [A30]: Updated to 2025 figures.

Commented [A31]: Hyperlink to be updated with the revised final report to include the correction we made during the main Reg 19 consultation to the time period for Completions figures and also to ensure it includes the final figures reflecting the final LP allocations and the agreed updated Monitoring Point of 2025.

new communities, and ensuring land and infrastructure are available to support business growth and innovation.

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[15] 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~~ 88.66 hectares

B. Sites at Cranbrook – 19.2ha

C. Sites at ~~2nd new community~~Marlcombe (up to 2042) – around ~~17.5~~ 16.5 ha

D. Sites built 2020-2024 – 6.8ha

E. Sites with planning permission or under construction at 2024- 44ha

F. Total- ~~178.16ha~~ 175.16ha

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 (EDNA)[16] (mid-point clean growth scenario) and ongoing monitoring work.

Commented [A32]: To reflect the name now given to the 2nd New Community

Commented [A33]: Change reflects reduction in the masterplan work from the previous allocation or 17.5 hectares to a new provision of 16.5 hectares. This also informs a revised total in item F later in the policy.

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

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

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 across the whole plan area including the Cranbrook Plan area.

Justification for policy

3.25. The Council Plan[17] and Economic Development Strategy[18] 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

[17] ~~Library/reference and link to the Council Plan to be inserted.~~ ECNECN-0134 – Council Plan 2024-2028, ~~https://eastdevon.gov.uk/media/cssdqawq/ecn-014-council-plan-2024-2028.pdf~~https://eastdevon.gov.uk/media/cssdqawq/ecn-014-council-plan-2024-2028.pdf

[18] ECN-002 – Economic Development Strategy 2024-2029, ecn-002-economic-development-strategy-2024-29.pdf

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 and additional land required to address past underprovision, ensure that Cranbrook and Marlcombe achieve high levels of self containment, improve self containment in existing settlements and ~~,~~ offer~~ing~~ flexibility and choice to the market. 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.

Commented [A34]: Amended wording to explain why employment land provision exceeds EDNA requirements.

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~~ 16.5
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_23a and Clge_25a)	E(g)	2.13

Commented [A35]: Allocation is reduced in size in line with work coming out of the Marlcombe master planning work.

Policy reference and address	Uses permitted	Amount of employment land (ha)
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_20~~b~~)	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_11c~~a~~)	E(g)	0.4
Strategic Policy SD03: Honiton and its future development:		
Policy reference and address	**Uses permitted**	**Amount of employment land (ha)**
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		

Commented [A36]: Delete site Axm_01a 2ha in response to statutory consultee objections re flood risk, impact on archaeology and non-designated heritage assets

Strategic Policy SD07: Development at Broadclyst (Brcl_12)	E(g)	0.6
Strategic Policy ~~SD17~~SD18: Development at Feniton (Otry_20)	B2, B8, E(g)	4.64
Strategic Policy ~~SD18~~SD19: Development at Hawkchurch (Hawk_01)	E(g)	0.25
Strategic Policy ~~SD20~~SD21: Development at Musbury (Musb_01a)	E(g)(i)	0.06

Commented [A37]: Typo

Commented [A38]: Typo

Commented [A39]: Typo

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.

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~~0~~)[19] details the rationale for their delineation.

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 NPPF ~~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.

[19] KSD-011~~0~~ – Settlement Boundary Topic Paper: https://eastdevon.gov.uk/media/j5jlpsym/ksd-010-settlement-boundaries.pdf (New link to updated doc required)

This policy applies across the whole local plan area other than in the Cranbrook Plan area where it applies only to 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 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:

Commented [A40]: Text removed as CIL Reg 122 would not allow for requiring contributions to address existing shortfalls.

A. Assess the infrastructure requirements arising from their development, where not already identified in a development allocation policy or the Infrastructure Delivery Plan (noting these needs should be addressed in any planning application).

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~~Include a mechanism for the long-term maintenance and management of new infrastructure. supported by high quality public services through a management regime that is predicated upon the creation of social value.

The provision of new infrastructure will only be approved where the planning authority has ascertained that it would not adversely affect the integrity of any European wildlife sites. Infrastructure provision providing mitigation for European wildlife sites will need to be compliant with Habitat Regulations and contributions will need to be of a scale and kind to address identified concerns and remain for the long term.

Where appropriate, the Council will use planning conditions or planning obligations to secure the provision of infrastructure and its ongoing maintenance. An assessment of provision will be undertaken at the time of an application to ensure any requests for s106 contributions remain evidenced and justified.

This policy applies across the whole local plan area including the Cranbrook Plan area noting that the Cranbrook Plan also sets out Cranbrook bespoke requirements.

Commented [A41]: Change made to note that policy wording is geared around additional infrastructure needs that are in excess of those already identified in the IDP or allocation/other plan policies.

Commented [A42]: Text added/changed to reflect expectations for social value management regimes. Stewardship of Public Amenities.pdf

Commented [A43]: There is a particular concern around compliance with Habitat Regulation considerations that this new text seeks to help to address.

Commented [A44]: To ensure we secure justified 106 contributions,

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.

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)[20] 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)~~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.

3.43b. A considerable amount of transport infrastructure will be required alongside housing and employment growth. Some of the most significant transport infrastructure requirements, such as improvements to the M5 and A30, and new railway passing loops, are due to development and background transport growth across the wider sub-region. The emerging Greater Exeter Transport Strategy contains a range of strategic transport infrastructure projects, including sustainable travel measures, located in the administrative areas of East Devon, Exeter, Teignbridge and Mid Devon. Development in the respective areas will contribute to the delivery of transport infrastructure as appropriate, but it is likely that additional public funding will be necessary.

3.44. Additional homes create the need for additional education provision including primary and for early years, primary, secondary, post 16 and further education and provision for students with special education needs ~~school paces~~and disabilities. 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.

3.44b. The Council will work with relevant infrastructure and service providers, including education, health, police, and transport authorities, to ensure timely and effective delivery of infrastructure. Where appropriate, planning obligations (S106) will be used

[20] KSD-001 – Infrastructure Delivery Plan (IDP), https://eastdevon.gov.uk/media/g54jh2qx/ksd-001-infrastructure-delivery-plan.pdf

Commented [A45]: Disproportionately removed as not reasonable wording/expectation.

Commented [A46]: Change made to highlight transportation assessment work that has been undertaken and specific joint work with National Highways and neighbouring authorities..

Commented [A47]: Text added to give greater clarity around education needs and provision.

to secure the provision and ongoing maintenance of infrastructure, particularly for education and health facilities.

Commented [A48]: New paragraph added to promote timely delivery of infrastructure specifically in respect of provision and working with service providers - including education, health, police, and transport authorities.

Infrastructure Provision

~~3.43.~~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. Access to education is a legal requirement and statutory duty of the county council meaning the delivery of appropriate education infrastructure to support development is critical. This includes provision for early years and childcare, primary, secondary, post 16 and pupils with special educational needs and disabilities.

Commented [A49]: Text added to highlight specific considerations in respect of education provision and the legal responsibilities of Devon County Council and to note that infrastructure needs have featured in viability assessment and work has informed plan policy.

~~3.44.~~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.

~~3.45.~~3.47. As the local plan progresses, detailed assessments of infrastructure needs and provision plans will be required.

Phased Delivery of Infrastructure and Services

~~3.46.~~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 or single 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 and align with infrastructure on neighbouring parcels/ sites. 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 and align with infrastructure on neighbouring parcels/ sites.

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 to a ~~publically~~publicly accountable body, 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.

This policy applies across the whole local plan area including the Cranbrook Plan area noting that the Cranbrook Plan also sets out Cranbrook bespoke requirements.

Commented [A50]: Change made to clarify it applies to single developers as well.

Commented [A51]: Changes made to clarify that infrastructure alignment is appropriate and needed.

Commented [A52]: Change provides clarity.

Justification for policy

~~3.47.~~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.

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 levels in this area, with projects including district heating, ~~green infrastructure~~GI, 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~~NLs. 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 on a map 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, at its closest 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.

Commented [A53]: Clarifies its not physically high growth, i.e. tall buildings.

Commented [A54]: Minor change in word orderings - it reads better.

Commented [A55]: Change gives more clarity.

4.6. In technical assessment work East Devon Options Appraisal Report[21] there is a vision of the new community, this states:

Commented [A56]: Vision wording below has been updated and amended noting ongoing work for Marlcombe.

Marlcombe will be ~~A second new community in East Devon with~~ a self-sufficient, healthy and vibrant ~~dynamic~~ community with distinctive character. Delivering up to ~~8,000~~ 10,000 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 will be supported by the timely delivery of infrastructure such as schools, health facilities, shops and other community facilities in step with housing.

Marlcombe ~~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.

Marlcombe ~~The structure of the settlement~~ will promote innovative design that will draw inspiration from the local context, respecting the setting of the historic farmsteads, traditional field patterns and country lanes~~including the unique surrounding historic environment~~, to create a rich character of its own. The town will be arranged around three distinct neighbourhoods each with their own character. Streets and spaces will be designed to encourage social interaction and will be ~~embedded in a~~ well-connected with ~~and~~ integrated active travel network with comprehensive links to nearby employment, surrounding countryside, Cranbrook and the city of Exeter. The Town Centre will follow the local tradition of compact town centres consisting of high density linked terraces with a traditional market square.

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 rolling landscape of the Clyst Valley whilst retaining the physical and visual separation from the nearby villages of Farringdon and Clyst St Mary. Marlcombe's green spaces will ~~outstanding East Devon natural environment and~~ contribute to the delivery of the Clyst Valley Regional

[21] ~~GEV-003~~ NWC-001- 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 (may need new link)

Park whilst protecting ~~nearby internationally recognised habitats~~ the bio-diversity of the Exe Estuary and East Devon Pebblebed Heaths..

Marlcombe ~~It~~ will provide a rich network of substantial open space, food growing opportunities and diverse landscaping, including areas of enhanced ecology and biodiversity. Space~~, as well as opportunities~~ for play, sport and recreation will be integrated through the town and build strong links to sports clubs around Clyst St Mary. ~~and opportunities for food growing.~~

As a ~~This~~ vibrant and adaptable new community Marlcombe will preserve East Devon's legacy as an outstanding place to live. The use of local materials such as stone and render finishes and labour with skills gained from Exeter College and from educational facilities within the town will be promoted to deliver on local priorities. Marlcombe will be~~, ~~creating~~ somewhere residents can be proud of and where people of all ages and lifestyles will prosper.

Strategic Policy WS01: Development of ~~a second~~Marlcombe 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, to be known as Marlcombe. ~~The new community~~Marlcombe 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~~Marlcombe 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.

Commented [A57]: Policy has been amended - specifically in the light of new evidence and material that has been produced and to give greater clarity for the future development of Marlcombe.

Development will need to occur and proceed broadly in accordance with the masterplan shown below plan policy ~~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, drawing inspiration from the local context including the unique surrounding historic environment, creating safe and attractive places with a rich character that enhance health and wellbeing. Design should be innovative, with an explicit focus on sustainable construction and building operation and renewable energy production and use. Open spaces and facilities shall incorporate public art and 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 A~~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.

Marlcombe will provide~~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. ~~a~~Affordable housing provision in accordance with strategic policy HN02, with an aspiration of 40% on-site provision subject to viability;

B. a mix of types and sizes of ~~market~~ housing including for older people, accessible and adaptable homes and custom and self-build in accordance with strategic policies~~y~~ HN03, HN04 and HN05~~1~~. Provision must be made for both a minimum of a 70 unit Extra Care Housing scheme and a C2 residential care home; and

Commented [A58]: Wording requested by Devon and Cornwall Police.

Commented [A59]: Wording requested by Historic England.

~~B.~~C. Provision of specialist housing to support younger vulnerable people in the community.

~~C.~~D. a site-wide average density of at least 45 dwellings per hectare (net).

High density housing of at least 55--60 dwellings per hectare (net) will be required within the ~~town centre,~~ neighbourhood centres and around key destinations and transport hubs. Within and around the town centre, densities of up to 75 dwellings per hectare (net) will be required.

Gypsy and Traveller Provision

Up to 2042 – One or more sites which together accommodate~~ing~~ at least 15 pitches.

Beyond 2042 – One or more additional site or sites which together accommodate~~ing~~ at least 15 additional pitches.

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

Jobs

Up to 2042 – At least 16~~7~~.5 hectares of land in office, industrial and warehouse sectors (E, B2 and B8).

Beyond 2042 – Around 23.5~~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.

As a minimum, ~~S~~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 and Neighbourhood Centres

Up to 2042 – Allocation of 12~~5~~ 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, cultural and leisure uses.

Beyond 2042 – Completion of additional town centre development to occupy a grand total of at least 12~~5~~ hectares of land (pre and post 2042 development).

A town centre will provide a focal point for retail, business, cultural 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.~~

In addition to a town centre, 3 hectares of land is allocated for two neighbourhood centres to complement the town centre and meet local needs for retail, business, cultural and leisure activities.

Social, Cultural, Leisure, Health and Community ~~and Education~~ Facilities

Accommodate a full range of social, cultural, sport, leisure, health and, community ~~and education~~ facilities and services. S106 obligations will secure the delivery of physical infrastructure and revenue contributions towards the delivery of services to support the growth of the community and the health and wellbeing of its residents.

Education facilities

New education facilities will be provided at Marlcombe. These will meet the needs of all age groups that will live in the town with provision to be made for nursery, primary, secondary, post-16 and special educational needs education requirements. The education infrastructure planned for the new community will also provide for a wider area in order to meet the needs of the plan.

At least 23.5 hectares of land is required for education provision within the land allocated in this plan, to be provided as follows unless otherwise agreed by the local planning authority:

A. An education campus for early years, primary, secondary, post-16 and special educational needs provision on at least 17.3ha land

B. A second primary school with early years provision on at least 2.6ha land

C. A third primary school with early years provision on at least 1.8ha land

D. A fourth primary school with early years provision on at least 1.8ha land

~~(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 and will include the need for facilities at the education campus to be delivered first. The precise timing and mechanism for the delivery of the schools is to be established through the phasing and infrastructure delivery strategies. ~~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.~~

Wider Infrastructure

Wider ~~i~~infrastructure provision will need to come forward with overall development proposals.

In addition to the other requirements of this policy the Marlcombe allocation will accommodate the infrastructure and uses listed below:

A. Suitable Alternative Natural Greenspace (SANG) at a ratio of 8ha SANG per 1,000 population (at a ratio of 2.35 persons per dwelling). For 8,000 homes this equates to 150.4ha of SANG.

B. At least 23.5ha land for education uses, to include a single site for an education campus accommodating nursery, primary, secondary, post-16 and special educational needs provision in-line with the ~~Infrastructure Delivery Plan.~~IDP.

C. Equipped/serviced open space for the following typologies delivered at the specified rates, where rates are provided on a per 1,000 population with 2.35 persons per dwelling. Figures in brackets are the equivalent provision for 8,000 homes, for information only.

- Parks and Gardens at 0.8 hectares (15.04 hectares)
- Equipped designated play areas for children and youth at 0.25 hectares (4.7 hectares)
- Informal/other play areas at 0.3 hectares (5.64 hectares)
- Allotments at 0.25 hectares (4.7 hectares)
- Amenity Open Space at 0.35 hectares (6.58 hectares)

D. 20ha playing pitches, to include grass and artificial pitches, floodlighting and sports pavilion/s to provide changing rooms and clubhouses.

E. Serviced land of at least 1ha in size for a cemetery.

F. Serviced land for a place of worship and parsonage.

G. At least 4.05ha serviced land for a Materials Reclamation Facility/Waste Transfer Station

H. The provision of two park and rides sites, to be located close to the A30 and A3052, together totalling not less than 3ha.

I. At least 1ha serviced land for electricity reinforcement provision in close proximity to the existing 132kV network

J. Leisure Centre

K. Integrated Neighbourhood Health Centre

L. Blue Light facility

M. Financial contribution toward the improvement of public transport measures serving the town

N. On-site and off-site walking, wheeling and cycling infrastructure

O. Off-site highway improvements

P. Mobility hubs at appropriate locations within the town

~~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 has ~~will~~ produced an ~~Infrastructure Delivery Plan~~IDP that ~~will~~ sets 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 Sustainable Drainage System (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.

Proposals to develop land within the new community of Marlcombe must progress in accordance with an allocation-wide masterplan, Infrastructure Delivery Strategy (to accord with the ~~Infrastructure Delivery Plan~~IDP 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~~IDP 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 Strategy is being produced and will ~~will be a key component and will form part of the allocation-wide Masterplan~~ provide~~ing~~ 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~~ Consultation Zone

Proposed development within the Hill Barton Waste Consultation Zone will be permitted where it can be demonstrated by the applicant that:

A. the proposal will not prevent or restrict the operation of the existing or permitted waste management facility; or

B. the potential impacts on the operation of the waste management facility can be adequately mitigated by the applicant; or

C. there is no longer a need for the waste management facility, having regard to the availability of equivalent capacity within Devon; or

~~A.~~D. a suitable and deliverable alternative location can be provided for the waste management facility.

Commented [A60]: Wording requested by DCC.

~~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.~~

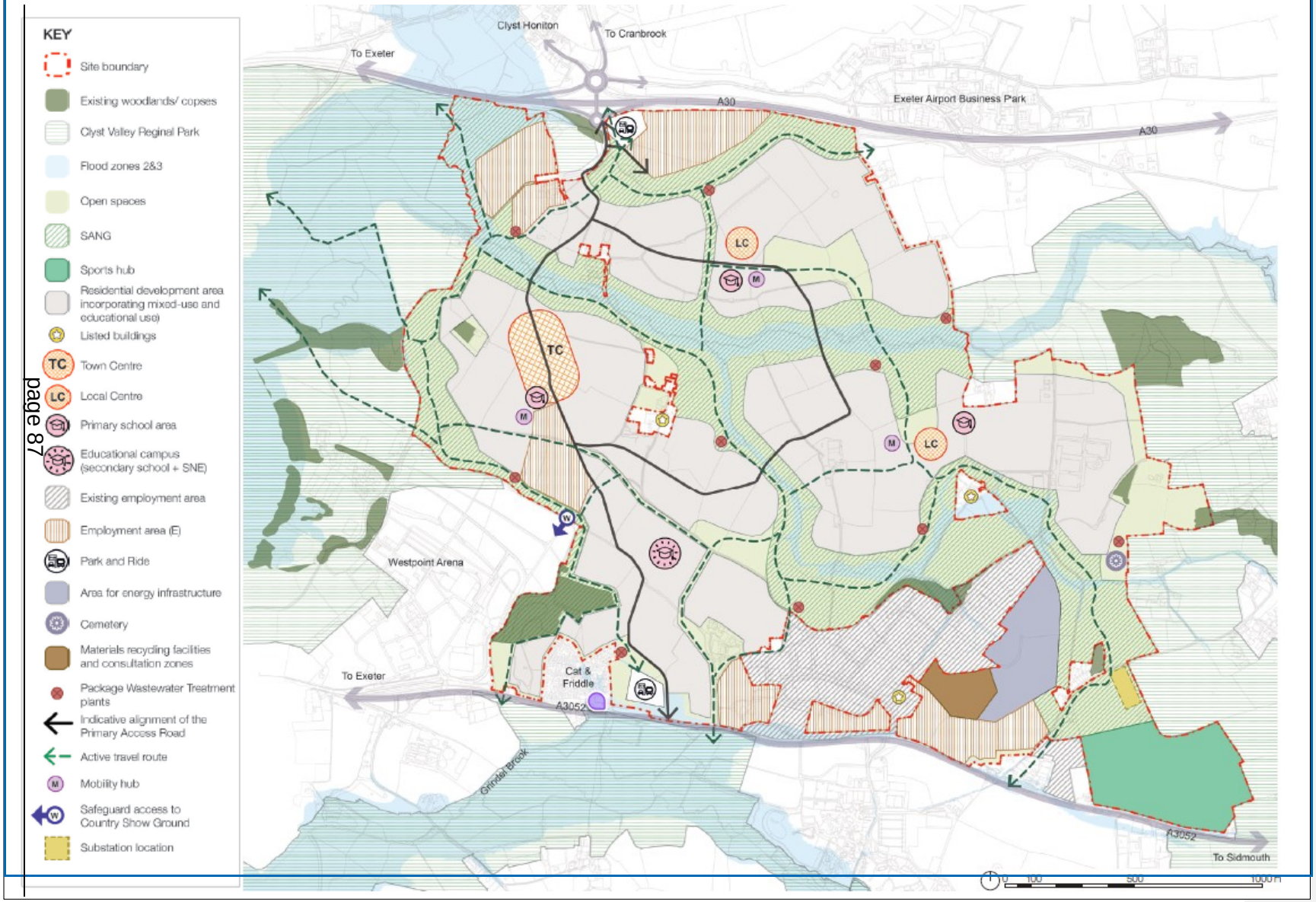
This policy does not apply in the Cranbrook Plan area.

The plan on the following page sets out the masterplan for Marlcombe, as referenced in plan policy.

Commented [A61]: Delete subject to addition of appropriate district-wide policy.

Commented [A62R61]: Note that the Environment Agency stated at Reg 19 that this section could have been more strongly worded and wanted the word 'must' included.

Commented [A63]: Text added to the plan to advise of the Masterplan for Marlcombe with the plan itself added to the page that follows.


KEY
Site boundary
Existing woodlands/ copses
Clyst Valley Reginal Park
Flood zones 2&3
Open spaces
SANG
Sports hub
Residential development area incorporating mixed-use and educational use)
Listed buildings
TC Town Centre
LC Local Centre
Primary school area
Educational campus (secondary school + SNE)
Existing employment area
Employment area (E)
Park and Ride
Area for energy infrastructure
Cemetery
Materials recycling facilities and consultation zones
Package Wastewater Treatment plants
Indicative alignment of the Primary Access Road
Active travel route
Mobility hub
Safeguard access to Country Show Ground
Substation location
Clyst Honiton
To Cranbrook
To Exeter
A30
Exeter Airport Business Park
A30
LC
TC
M
LC
Westpoint Arena
To Exeter
Cat & Fiddle
A3052
Grindel Brook
A3052
To Sidmouth
0
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Justification for policy

4.7. The local plan provides for a second new community near Exeter, with the chosen name being Marlcombe. The scale of development will ensure a wide range of services and facilities, supported by substantial infrastructure provision. Alongside housing delivery, ~~K~~key facilities, including a secondary school as part of an all-through education campus, will be planned and built to serve ~~the new community~~Marlcombe and surrounding areas.

4.8. ~~The new community~~Marlcombe 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.

4.8b A key element of the Marlcombe Transport Vision is to deliver community facilities and jobs alongside new homes to minimise out-commuting, build a self-contained community, and encourage sustainable travel habits among residents from the outset. A range of on and off-site transport infrastructure improvements will be required in delivering Marlcombe (and other strategic housing and employment development at the West End and beyond). Active travel routes form a key part of the masterplan for the new community, and also extend to key destinations elsewhere including north to Exeter Airport, Skypark, and Cranbrook; and west towards Exeter. Similarly, planned new bus services will operate within Marlcombe and connect to Exeter, Cranbrook and other places, taking advantage of bus priority measures such as new bus lanes and priority signalling within Marlcombe and along key routes into Exeter. Mobility hubs across Marlcombe, including two Park and Ride/Change sites, will enable people to access and transfer to different modes of transport.

4.8c Alongside these sustainable travel measures, modelling shows that physical highways improvements to the road network will be needed to cope with traffic growth not only from development at Marlcombe and elsewhere in East Devon, but also due to general background traffic growth across the wider sub-region. These include improvements to the A30 Airport Roundabouts, Clyst St Mary Roundabout, and at M5 Junctions 29 and 30. Development at Marlcombe will make appropriate contributions to the delivery of transport infrastructure, but it is likely that additional public funding will be necessary, particularly for strategic transport infrastructure projects.

Commented [A64]: Change requested by DCC Education for clarity

Commented [A65]: Changes add clarity to paragagh

4.8d The emerging Greater Exeter Transport Strategy contains further detail on the transport measures at Marlcombe and the West End, and the Council will continue to work with key partners on its delivery.

4.8e Hill Barton is identified as a strategic location for waste management and has an associated Waste Consultation Zone. The Devon Waste Plan seeks to ensure that consideration of non-waste development takes into account the need to safeguard waste management capacity and avoid constraining existing and future waste operations.

4.8f Policy WS01 sets out the strategic policy for the development of the Marlcombe new community. Further details and policy expectations, including for the allocation of additional land to expand the new community to 10,000 homes, will be set out in future planning policy documents. This could include the production of one or more of a Supplementary Planning Document, Area Action Plan or a stand alone Development Plan Document.

Commented [A66]: New text added to give details of transportation assessment work that has been undertaken and outputs arrived at from this.

Commented [A67]: To reflect transport evidence completed after 1st Reg. 19 consultation and 1st Reg. 19 National Highways consultation response.

Commented [A68]: Text added to ensure plan users are aware of waste considerations.

Commented [A69]: Text sets out longer term growth expectations and also highlights potential for future plan production.

The Enterprise Zone

~~4.8.~~4.9. Enterprise Z~~z~~ones are designated areas where employment and business growth are actively encouraged, offering a simpler planning regime and incentives to investors. Land forming part of the Enterprise ~~zones~~Zone in the West End of East Devon, including the Science Park and~~,~~ Skypark~~, and Exeter Logistics Park,~~ ~~have~~ has 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.

Commented [A70]: Test clarifies its one Enterprise Zone.

Commented [A71]: Exeter Logistics Park is not an enterprise zone so it is deleted

~~4.9.~~4.10. Clean growth, defined by the government as increasing national income while reducing greenhouse gas emissions[22], 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.

~~4.10.~~4.11. The Exeter and East Devon Enterprise Zone covers four areas, including a designated area within Cranbrook. The Council will continue to

[22] ECN-01~~0~~1 – The Clean Growth Strategy, https://eastdevon.gov.uk/media/2qncdlpf/ecn-011-clean-growth-strategy-correction-april-2018.pdf

support employment-generating development within these sites, ensuring policy coverage is maintained.

~~4.11.~~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.

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

Commented [A72]: To clarify links can be to one or other.

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 applies to local plan areas that are specified in policy wording and is applicable to Cranbrook Town Centre, which is in the Enterprise Zone, and therefore policy does apply in the Cranbrook Plan area.

Justification for policy

~~4.12.~~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.

~~4.13.~~4.14. Current LDOs include:

- District Heating
- Power Park, Exeter

~~4.14.~~4.15. The Council is developing an LDO for Sky Park.

Exeter Science Park

~~4.15.~~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. Knowledge based industries focussing on the ~~R~~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 uses or for businesses that do not accord or align with Science Park objectives.

Commented [A73]: Change clarifies nature of research work types that are acceptable at the Science Park.

Commented [A74]: Minor change gives clarity.

This policy does not apply in the Cranbrook Plan area.

Justification for plan policy

~~4.16.~~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

~~4.17.~~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

~~4.18.~~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~~ identified for small, high-quality business units to meet local demand, with the remaining 2.3ha allocated for housing.

Commented [A75]: Minor wording change to give clarity.

Exeter Airport and development in the environs

~~4.19.~~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.

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.

Justification for plan policy

~~4.20.~~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.

~~4.21.~~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.

~~4.22.~~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.

~~4.23.~~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

~~4.24.~~4.25. Land east of the airport buildings is allocated for various employment uses, 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. The allocated site adjoins Power Park, a 7.7ha site which~~,~~ 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.~~

Commented [A76]: Wording change clarifies that Power Park is not part of the allocation.

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).

Commented [A77]: Minor grammatical changes and tidying up is made to this policy.

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;

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:

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

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

H. Protection of the County Wildlife Site (CWS);

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

J. 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;

K. A comprehensive site-specific Flood Risk Assessment (FRA) 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;

L. 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.

~~L.~~M. An appropriate foul drainage solution to be delivered.

Part of the site is at risk of flooding and a Level 2 Strategic Flood Risk Assessment (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 policy does not apply in the Cranbrook Plan area.

Commented [A78]: In consultation the Environment Agency highlighted that there is currently no mains drainage in the vicinity and as such this is an important consideration - change made to note this.

Commented [A79]: Wording change is made to ensure consistency with wording of other allocations in respect of flooding.

Justification for plan policy

~~4.25.~~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.

~~4.26.~~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.

~~4.27.~~4.28. The site is within a Nitrate Vulnerable Zone and Impact Risk Zones for the Exe Estuary SPA and East Devon Pebblebed Heaths Special Protection Area (SPA) and (Special Area of Conservation) SAC, requiring careful management of water discharge and air pollution impacts.

Employment land north of the airport, adjoining Treasbeare

~~4.28.~~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.

Commented [A80]: None of the other allocations are as well suited to general industrial use and this will be the majority use. Including light industrial in the text weakens it.

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.

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.

Part of the site is at risk of flooding and a Level 2 Strategic Flood Risk Assessment (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.

Commented [A81]: To update the policy following additional SFRA L2 work.

This allocation will need to be supported by further ~~flood risk assessment~~FRA work 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.

Heritage impact assessment and mitigation will be required, taking account of nearby designated and non-designated heritage assets (including Grade II listed Treasbeare Farmhouse) with careful consideration of setting, building height, design, and landscaping

Commented [A82]: Heritage matters are seen as significant at this site and this additional text highlights this importance.

This policy does not apply in the Cranbrook Plan area.

Justification for plan policy

~~4.29.~~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.

~~4.30.~~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

~~4.31.~~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.

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.

Part of the site is at risk of flooding and a Level 2 Strategic Flood Risk Assessment (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.

Commented [A83]: To ensure consistency of wording with other allocations.

Site-specific ~~Flood Risk Assessment~~FRA 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

~~4.32.~~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.

4.34b. Flood Risk Assessment is required due to the presence of the ordinary watercourse on site, and the surface water risks present, not fluvial risk.

Commented [A84]: EA have requested that the reason for the FRA be clarified.

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.

~~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.

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~~CVRP, which this plan -seeks to expand~~provides the expansion for~~.

Commented [A85]: Minor changes provide clarity of meaning.

Strategic Policy WS09: Clyst Valley Regional Park

Commented [A86]: Minor changes made to policy wording to provide accuracy.

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~~GI and support the achievement of the objectives in the CVRP ~~Management Plan~~Masterplan. 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~~ CVRP 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;

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 (NRN);

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 ways 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 across the whole local plan area including the Cranbrook Plan area.

Justification for policy

~~4.36.~~4.38. The ~~Clyst Valley Regional Park~~CVRP is a strategic 4,100Ha landscape asset at the edge of Exeter ~~asset~~ on the western side of East Devon, providing a landscape ~~forming a~~ setting for new ~~developments~~and existing communities and commercial developments. It was first defined alongside earlier strategic development schemes.

~~4.37.~~4.39. A 25-year masterplan for the Regional Park[23], 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. It is anticipated that the CVRP masterplan will be reviewed and updated to reflect boundary changes, the Local Nature Recovery Strategy (LNRS) and national planning and GI policy and guidance.

~~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.

~~4.39.~~4.41. The park helps contribute to conservation and restoration of South East Devon European protected wildlife sites by taking pressure of

Commented [A87]: Wording changes provide clarity and highlights the scale of the park.

Commented [A88]: Change included to advise of future work..

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

them ~~meeting conservation objectives.~~ and the delivery of the Three Rivers Landscape Recovery Project at Killerton.

Commented [A89]: Change adds more detail.

~~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.~~ Urban tree cover is also vital to contribute to canopy cover in the Clyst Valley and East Devon.

Commented [A90]: Change adds more detail.

~~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~~CIL 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. Taking advantage of proximity to Exeter and links with Topsham, land is allocated for an urban extension north of Topsham.

Commented [A91]: Typo.

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 education provision for early years, primary, and secondary and pupils with special educational needs and disabilities ~~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

Commented [A92]: Change made to give greater clarity to education matters..

D. Supporting infrastructure, green spaces and links to the ~~Clyst Valley Regional Park~~CVRP and supporting and delivery of onsite habitats that reflect and link into the adjacent Priority Habitat - Coastal and floodplain grazing marshes.

Commented [A93]: Change made to highlight scope to create habitats compatible with the adjoining habitat types.

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 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~~EDDC 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~~GI 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~~CVRP.

The Delivery Framework will be produced jointly by ~~East Devon District Council~~EDDC and the City Council working with partners including landowners, developers, Devon County Council, National Highways, 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 Marlcombe ~~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.

Commented [A94]: To also highlight National Highways as a partner in work.

This policy does not apply in the Cranbrook Plan area

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 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~~IDP across the city boundary.

4.45b. The Clyst Road and Newcourt Road Transportation Access Strategy identifies a range of transport measures required to deliver sustainable growth across the local area, at land in the administrative areas of East Devon District Council and Exeter City Council. Projects in East Devon include a new pedestrian/cycle crossing of the M5 east of Newcourt Station; continuous walking and cycling provision and a new bus service on Clyst Road; and improving active links on Old Rydon Lane between Clyst Road and E9 Cycle Route.

Commented [A95]: To reflect transport evidence completed after 1st Reg. 19 consultation and 1st Reg. 19 National Highways consultation response.

~~Gypsy and traveller site east of the M5~~

Commented [A96]: This site has significant constraints (highways, flooding and archaeology) which require detailed technical evidence to support the allocation. The evidence does not exist or been forthcoming, and there is current lack of evidence of site owner promotion for a Gypsy and Traveller use, so the allocation site and supporting policy is deleted.

4.43. ~~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.~~

~~Justification for plan policy~~

~~4.44.~~ ~~The latest needs study highlights[24] 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.

~~[24] HOU-009 – East Devon Gypsy and Traveller Accommodation Assessment, https://eastdevon.gov.uk/media/gl0n5qkq/2024-09-30-east-devon-gtaa.pdf~~

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 Ancient Monument.

This policy does not apply in the Cranbrook Plan area.

Commented [A97]: Change gives accurate formal title reference.

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:

- Detailed ~~flood risk assessment~~FRA;

- Archaeological assessment; and
- Onsite verification of the extent of the Coastal and Floodplain grazing marsh priority habitat and a design and layout which avoids this area and, where possible, enhances it.

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

This policy does not apply in the Cranbrook Plan area.

Commented [A98]: Change highlights scope for works to promote enhancement.

Commented [A99]: Network Rail are concerned that increased traffic may need mitigations to improve active travel options/bus connections at the station and in the area to make it more viable as a means of avoiding traffic congestion

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.

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 for pedestrian and vehicular access 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.

Commented [A100]: Change recognises improvement should be for pedestrians and vehicles.

Part of the site is at risk of flooding and a Level 2 Strategic Flood Risk Assessment (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. 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 be assessed on site as part of a drainage strategy. Noting that the site is located within a Nitrate Vulnerable Zone, Impact Risk ~~Zone~~ Assessment 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.

Commented [A101]: To update the policy following additional SFRA L2 work.

Commented [A102]: Change clarifies wording meaning.

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.

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

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 and delivery of onsite habitats should reflect and link into adjoining priority habitats. This site will need to provide pedestrian and cycle access into the adjoining site Exmo_04a.

Commented [A103]: Change, noting surrounding habitat importance, promotes biodiversity enhancing links to these.

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 and delivery of onsite habitats should reflect and link into adjoining priority habitats. -There will need to be pedestrian and cycle access through this site into Site Lymp_14 and thereafter on into Goodmores Farm.

Commented [A104]: Change, noting surrounding habitat importance, promotes biodiversity enhancing links to these.

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.

This site allocation will need to come forward on the basis of an agreed masterplan and access strategy 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.

A detailed heritage assessment will need to accompany any overarching planning application/s for the site or any other planning applications for any parts of the site that are visible from or otherwise lie in close proximity to, or impact upon the setting of any listed buildings or other heritage assets at or close to the site, this explicitly includes the St John in the Wilderness church. An extensive area must be established around the church in master planning work within which built development will not be allowed, though, subject to not having adverse heritage impacts, open space non-sports pitch uses will be permitted.

Northern parts of the allocated site fall in a Mineral Safeguarding Area (for sand and gravel resources) and associated larger Mineral Consultation Area as defined in the Devon County Council's Minerals Plan 2011-2033 (and as may be refined or appear in amended form in any subsequent minerals Local Plan). The safeguarding area is shown on the local plan policies map.

Planning permission for development or use of the land (including for open space and recreational uses) in the Mineral Safeguarding Area will not be permitted unless the development demonstrates through a robust Mineral Resource Assessment, that the mineral resource is not of current or potential economic value. Should a Mineral Resource Assessment show that the mineral resource is of current or potential economic value, prior extraction of the mineral resource in advance of development should be undertaken; or a non-mineral development is of a temporary nature and can

Commented [A105]: To ensure the proper development of the site.

Commented [A106]: To ensure that heritage matters are properly taken into account.

be completed and the site restored to a condition that does not inhibit extraction or operation within the timescale that the mineral resource is likely to be needed.

It is recommended that any applicant engages with the Mineral Planning Authority during the design stage of any development proposal.

The only exception to this constraint will be provision of an access road and associated parallel footway/cycleway that link built development at the site to the B3179 highway to the north of the site. This road access and any associated works must be sensitively designed to avoid any possible adverse impacts on the National Landscape. Street lighting should be avoided, and new planting should provide screening. Development of this site should actively support opportunities to enhance the natural beauty of the national landscape.

Development in the Mineral Consultation Area must be designed in a way to not constrain any future mineral working, for example, locating less sensitive uses adjacent to the Mineral Safeguarding Area. The Devon Minerals Plan seeks to ensure that sufficient and appropriate amounts and types of minerals are safeguarded and can be extracted, should demand arise and extraction is commercially and technically viable, to meet future needs. The role of Mineral Safeguarding Areas and larger Mineral Consultation Areas is to ensure that non-mineral development does not sterilise or constrain future mineral extraction. All proposals should be brought forward in consultation with the Mineral Planning Authority.

-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. Over and above mineral constraints n~~N~~ew homes and other development that would result in unacceptable impacts will not be permitted within 400 metr~~ee~~s of the Pebblebed Heaths. A natural buffer should be retained in the northeast of the site, along the B3179, to conserve foraging areas for nightjars opportunities for BNG and to maintain visual amenity adjacent to the East Devon National Landscape. Any car parking near to the SAC/SPA should be for uses that do not support recreational access to the SAC/SPA. 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. If delivered onsite the SANGs should be as tightly integrated as possible to residential development in terms of location and access. Any onsite SANG should be buffered, fenced and have restricted onwards access towards the SAC / SPA.

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Commented [A107]: To ensure that mineral reserves are properly taken into account.I

Commented [A108]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

Commented [A109]: To ensure that mineral reserves are properly taken into account.

Commented [A110]: To highlight the importance of a part of the site as a natural buffer.

Commented [A111]: To provide a focus for where the SANG should ideally be delivered and also to highlight that the SANG should not have or lead to direct links to the SPA/SAC.

Existing hedges and trees within the site should be retained and reinforced with additional planting and habitat creation, including heathland on higher land at the northeastern end of the site as landscape enhancement.

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. Mitigation measures may be required to address potentially unacceptable adverse highways impacts, including at locations on the wider highway network. 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. As part of this, consideration should be given to alterations to vehicular access on St John's Road, in order to help create quiet routes for walking and cycling.

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. Development should take account of the relationship between the site and the East Devon National Landscape, with particular care taken to ensure that any development in the southern third of the site is sensitively designed and kept below the level of the ridgeline to the south. To avoid adverse landscape and visual impacts on the National Landscape and its setting, vehicular access should be taken from the Liverton Business Park (not Salterton Road). Existing hedges to the southern and eastern site boundaries should be reinforced and appropriately managed and additional trees planted.

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.

89

Commented [A112]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

Commented [A113]: To ensure that highways impacts are appropriately mitigated.

Commented [A114]: To promote active forms of travel.

Commented [A115]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

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 conserve and enhance the natural beauty of the site and its wider landscape setting ~~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. New circular pedestrian and cycle routes should be provided within the site, together with connections to the wider network, including the South West Coast Path and to local services in Littleham and to the Liverton Business Park.

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 and also account needs to be taken of potential for adverse impacts on the listed St Margeret and St Andrew's church to the east of the site. 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)

Commented [A116]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

Commented [A117]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

Commented [A118]: To ensure heritage matters are fully addressed.

This site forms an urban redevelopment opportunity that will accommodate a new police station as well as at least 20 new homes.~~,~~ Development should be designed to respond sympathetically to the character and appearance of the conservation area and conserve and enhance the settings of listed buildings around the site. Provided that it does not compromise the aims of this policy ~~though with skilful design, noting the significance heritage interests around the site~~, a greater number of new homes will be actively encouraged. Part of the site is at risk of flooding and a Level 2 Strategic Flood Risk Assessment (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.

Commented [A119]: To ensure heritage assets are properly considered in accordance with the comments of English Heritage.

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 designed and 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. Pedestrian/cycle access should be off Loup Court, with Public Rights of Way enhancements.

Commented [A120]: To promote improvements for pedestrians and cyclists.

Prestaller Farm, Beavor Lane (GH/ED/80a)

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 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 the railway station. Development should also ensure pedestrian/cycle access onto Axminster Footpath 79. There shall be no development within floodzones 2 or 3.

Commented [A121]: To reflect flood risks on the site.

~~**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.~~

Commented [A122]: Site deleted due to lack of archaeological evidence agreed at SPC 02092025.

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 and a community hall or meeting place. A programme of phased archaeological field evaluation will need to be undertaken prior to the submission of a planning application to be undertaken in accordance with an agreed Written Scheme of Investigation to understand the presence and significance of any archaeological remains that will be affected by the proposed development. 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~~ The masterplan will be informed by the findings of the archaeological field evaluation and will demonstrate how development will:

Commented [A123]: To ensure that archaeological remains on the site are properly understood prior to development commencing.

Commented [A124]: To ensure that the development takes proper account of the archaeological remains.

1. ~~particular account will need to be taken of~~ Secure public transport improvements and provide~~ing~~ active travel links to the town centre, ~~and~~ railway station, the existing road network and public rights of way;

2. ~~, together with a~~Address~~ing~~ the site's built environment, heritage and landscape setting;

3. Address flooding~~.~~;

4. Create a public open space in the northern part of allocation Axmi_02 provisioned with appropriate publicly accessible heritage information that enhances and better reveals the significance of the Roman and Romano-British settlement here;

5. Across the wider development include high quality accessible green space that is well related and sympathetic to protection of archaeological interests and their setting within the development and attractive, legible links from the site to the wider footpath network.

6. Conserve the setting of the Scheduled Ancient Monument and associated archaeological remains and addresses how adverse effects can be minimised and made acceptable and heritage-related public benefits realised; ~~and heritage sensitivities of the site.~~

7. Establish a strong sense of place

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. The site is located close to the statutory road network and development should avoid adverse impacts on road safety on the National Highway. There shall be no pedestrian access to the A 35.

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 F~~f~~lood R~~r~~isk A~~a~~ssessment (FRA) and a

Commented [A125]: Change made in accordance with Environment Agency comments as they raised specific concerns.

Commented [A126]: To provide clarity in light of comments from National Highways.

comprehensive 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~~ S~~s~~equential and exception tests ha~~v~~es~~~~ 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~~conserve and enhance the character and appearance of the Conservation Area ~~location~~ and the setting of surrounding heritage assets. Support

Commented [A127]: To more fully highlight importance of the conservation area and impacts development may have.

will be given for incorporation of unused or underused land and buildings adjoining the allocated site to be incorporated into a comprehensive scheme.

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. Development should be informed by detailed assessment and design work to maximise opportunities to conserve and enhance the natural beauty of the site and its wider national landscape setting. This should include the planting and maintenance of additional hedgerows and small areas of woodland. On the western edges the site is close to the historic village of Gittisham and particular sensitivity will

Commented [A128]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

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 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 30~~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 with areas of open space being located to reduce the impact of development on the setting of adjacent listed buildings and the scale, design, lighting and materials of new development being appropriate to the Blackdown Hills ~~National Landscape~~NL. ~~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.

Commented [A129]: It is not considered that the impact on these heritage assets and the national landscapes can be mitigated through changes to policy wording and the allocation is proposed for deletion.

Commented [A130]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

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. Areas of open space should be located to reduce the impact of development on the setting of adjacent listed building and the scale, design, lighting and materials of new development should be appropriate to the Blackdown Hills National Landscape.

Commented [A131]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

Land at Hurlakes, Northcote Hill (Honi_14)

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.

The site is adjacent to the Blackdown Hills National Landscape and development should be informed by detailed assessment and design work to maximise opportunities to conserve and enhance the natural beauty of the site and its wider national landscape setting. The scale (particularly height), design, lighting and materials of new development should be appropriate to the Blackdown Hills National Landscape.

Commented [A132]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

The site is also adjacent to the grade II listed Copper Castle former toll house and associated grade II listed gates. These heritage assets form a legible entry point to Honiton and development should seek to conserve and enhance the significance of these assets. The higher ground to the south of the site should be kept open. and the proposed junction carefully located and designed to protect landscape and heritage interests.

Commented [A133]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape and conserves the significance of the heritage assets identified.

Land south of Northcote Hill – north of the railway (GH/ED/39a)

This site is allocated for a total of 115 ~~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 round ~~total of 100~~ 195 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. Development should be informed by detailed assessment and design work to maximise opportunities to conserve and enhance the natural beauty of the site and its wider national landscape setting. The scale (particularly height), design, lighting and materials of new development should be appropriate to the Blackdown Hills National Landscape. There should be no development on land above the 160m contour. Provision should be made for suitably landscaped areas of open space with circular walks throughout the site, giving particular attention to the relationship with the national landscape.

Vehicular and pedestrian access improvements would be required, ~~incorporating~~ with Northcote Hill integrated into the development layout to ensure safe and effective connectivity. The development will need to maximise opportunities for localised improvements and ~~/~~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.

Commented [A134]: Increase the number in line with the outline application **23/0331/MOUT**

Commented [A135]: the number of homes has been increased as Devon County Council are satisfied that access issues can be managed

Commented [A136]: Need to use full wording and preceding "above the" is presumably not needed. Would it be clearer to delete AOD and just use "contour" instead?

Commented [A137]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

Commented [A138]: Change provides policy clarity.

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 harmonis~~z~~ed 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 FRA flood risk assessment is required and a~~An undeveloped buffer should be maintained and enhanced ~~-~~to expand the nature corridor and protect the ~~County Wildlife Site~~CWS and Ancient Woodland to the north west of the site.

Commented [A139]: Site screening did not identify this site for a level 2 SFRA. A review of 2025 mapping (NCERM2) shows a reduction in flood risk when compared with pre 2025 mapping (96.7% of the site in FZ1 compared with 92.5% pre-2025). FRA may be required by Policy AR01, but this does not need to be specified in this site specific policy.

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)

This land lies south of Strawberry Lane and is proposed for 60 houses. Archaeological assessment will be required prior to development commencing. This allocation will need to be supported by further ~~flood risk assessment~~FRA 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~~ FRA ~~and m~~Measures to ensure that safe cycle and pedestrian access to nearby facilities can be achieved will be required.

Commented [A140]: Archaeological assessment required by Historic England

Commented [A141]: Th FRA reference was included because, at the time, the site had not been screened for flood risk. When this happened it was found not to require a level 2 SFRA so the reference is no longer 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 Poplar Tree Drive and also consider impacts on and proximity to the Poplar Tree Drive/Barnards Hill Lane junction, with mitigation to improve road safety and/or calm traffic potentially required.~~

Commented [A142]: Typo

Commented [A143]: To provide flexibility as access is also likely to be possible off Lime Way. In response to comment by Baker Estates.

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 around the 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 [A144]: To provide flexibility and enable this to be explored in more detail through the development management process. In response to comment b Baker Estates.

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~~ 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. A harmonised vehicular access will need to be provided off Harepath Road.

Commented [A145]: Typo.

Commented [A146]: To clarify access arrangements, in response to comment by Devon County Council.

Land west of Axeview Road (Seat_13a)

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~~ around 160 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.

The site is in the East Devon National Landscape and development should be informed by detailed assessment and design work to conserve and enhance the natural beauty of the site and its wider landscape setting. The existing area of woodland to the north of the site should be retained and enhanced through an agreed landscaping scheme and new hedges and earth banks incorporated into the site layout. Consideration should be given as to how best to facilitate cycle and pedestrian paths through the site as an

attractive alternative to Woolbrook Road.

Land west of Two Bridges Road, Sidford (Sidm_06a)

This land is allocated for development to the north of Sidford to accommodate around 1530 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.
The site is in the East Devon National Landscape and development should be informed by detailed assessment and design work to conserve and enhance the natural beauty of the site and its wider landscape setting. A new boundary hedge to the northwest of the site should be planted and maintained; The existing hedgerows should be retained where possible and a suitable scheme agreed and implemented to incorporate the existing spring into the development.

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 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 development should be informed by detailed assessment and design work to conserve and enhance the natural beauty of the site and its wider landscape setting. It is also viewed in the context of ~~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:

Commented [A147]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

Commented [A148]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

Commented [A149]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

- 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 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. Through its layout, design and landscaping, development should respond sympathetically to the rural and historic character of the settlement, and should conserve and enhance the settings of designated heritage assets.

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~~-east 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

Commented [A150]: Suggested amendment - Historic England3

Commented [A151]: Typo

Commented [A152]: This site is too small to deliver employment land so the 0.1ha is deleted.

link into allocated land at Brcl_12. And there will need to be 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~~to conserve and enhance the natural beauty of the site and its wider landscape setting. Additional native tree and hedge planting should be provided and maintained to screen the road frontage with the B3178. Existing hedges should be retained and enhanced and adequate buffers provided between them and private curtilages. A high standard of design and use of appropriate materials reflecting local distinctiveness is required commensurate with the location within the National Landscape. This should include avoiding the introduction of street lighting along the B3178.~~.~~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.

Commented [A153]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

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_06aa)

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 be incorporated into the development. A sequential test and an exception test have been undertaken as part of the local plan. ~~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~~ adjacent to 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 the site frontage and deliver a suitable crossing, ~~with best endeavours to avoid~~ avoiding a ~~crossroad~~ crossroad-type arrangement with Gribble Mead.

Commented [A154]: Reverted to the larger site on the basis of the SFRA… changed back to the smaller site after discussion with Ed / Matt

Commented [A155]: Consistency of wording with other allocations.

Commented [A156]: Clarification of location of FZ3 now allocation is for Coly_06a and not Coly_06

Commented [A157]: Change gives greater clarity in respect of footpath expectations.

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). 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.

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).

Commented [A158]: To update the policy following additional SFRA L2 work.

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~~GI 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 to conserve and enhance the setting of grade II Oakhayes House and the character and appearance of 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.

Commented [A159]: To highlight importance of heritage considerations.

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~~GI 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 and incorporate landscaping buffers to conserve the settings of grade II listed Gilbrook House and Higher Venmore. Buffer zones of no built development at least 8m from the watercourse must be provided.

Commented [A160]: To highlight importance of heritage considerations and to note flooding constraints.

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. The design and layout of development should reflect the key characteristics of Woodbury Conservation Area to the north. Buffer zones of no built development at least 8m from the watercourse must be provided.

Commented [A161]: To highlight importance of heritage considerations and to note flooding constraints.

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 minimise 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,

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.

5.13b. The primary school at Tipton St John will be relocated during the plan period, either onto an alternative site within Tipton St John or to an alternative site outside the village (for example, to land at Thorne Farm in Ottery St Mary). Without the school, the number of facilities in Tipton St John will fall below the threshold needed to serve the needs of the local population and it will no longer qualify as a Tier 4 settlement.

Commented [A162]: Text added at DCC's request to clarify the position with regard to Tipton primary school. The exact wording suggested by DCC has not been used as it was liable to date.

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. This should incorporate an assessment of appropriate dwelling heights for this historic village and the wider character of the Blackdown Hills. The site should be landscaped to provide boundary screening appropriate to the edge of National Landscape location to conserve and enhance the natural beauty of the site and its wider landscape setting. This should include the provision and appropriate maintenance of a hedgerow of native species reinstating the historic field boundary around the site, except where access is required. -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 [A163]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

Commented [A164]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

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 and expected~~ required along with clear pedestrian links to tie into the existing footways.

Commented [A165]: Amended to reflect DCC as Highways Authority comments and for clarity.

~~Clyst St Mary~~

Commented [A166]: Bishops Clyst Neighbourhood Plan will be made at Cabinet on October 29, so there is no longer a need for this policy.

~~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, 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.

It is in the Blackdown Hills National Landscape and ~~.~~ development should be informed by detailed assessment and design work to maximises opportunities to conserve and enhance the natural beauty of the site, its wider landscape setting and the historic village. Particular attention should be paid to the materials and height of dwellings.

The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Commented [A167]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

Commented [A168]: Change made to stress importance of sustainable travel modes.

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 15~~22~~ new homes.

It is in the East Devon National Landscape and development should be informed by detailed assessment and design work to maximises opportunities to conserve and enhance the natural beauty of the site, its wider landscape setting and heritage assets in the vicinity of the site . 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. A~~a~~dditional hedgerows and orchard planting should be provided and maintained within the site to reflect the historic use and field pattern. Crossing provision over the B3178 should be provided for pedestrians and overhead wires across the site should relocated underground.

Commented [A169]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

Commented [A170]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

Commented [A171]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

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 to 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 dissects the site, as far as practically possible.

The south west corner of Wood_28 is within the Vulnerable Building Distance statutory safeguarding zone surrounding the Royal Marines Commando Training Centre, within which inhabitated buildings must be deemed as 'non vulnerable' structures that are of a robust design and construction to the satisfaction of the Ministry of Defence.

Anyone preparing a planning application at or for this allocation site should consult with the Ministry of Defence with whom the local planning authority will also engage with in respect of determination of any planning application. ~~Development should address the existing flooding issues along Mill Lane.~~

The design and layout of development should conserve and enhance the rural setting grade II* listed Exton Farmhouse, including through the provision of public open space in the northern part of the site. Flood mitigation is required to ensure existing surface water flood risk along Mill Lane is not exacerbated by the development.

Commented [A172]: Wording added at request of the Ministry of Defence who highlighted considerations relevant to proximity of the site to their establishment and safety concerns. Wording does not prohibit housebuilding (and there is not a defined line/area on the map) but the matter is highlighted.

Commented [A173]: To reflect Historic England comments and the Historic Environment Site Assessment Addendum.

Commented [A174]: Change made to stress the importance of flooding considerations and concern.

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 Burlands Mead is allocated for around 42 dwellings.

Land adjacent to Beechwood (Feni_08)

Land adjacent to Beechwoods is allocated for around 60 dwellings. Carefully 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 and associated car and cycle parking and turning areas. The site should be landscaped to provide boundary screening appropriate to the location. A contamination assessment, and any resultant remedial measures, will be required on the previously developed part of the site to support the planning application.

Commented [A175]: The GIS has a draft HSE layer which identifies contamination/hazardous waste on part of the site, so the extent of any contamination will need to be assessed and addressed as part of any planning application.

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 conserve and enhance the natural beauty of the site and its wider landscape setting. ~~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 an 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

Commented [A176]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

(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. A sequential test has been undertaken as part of the local plan. This site is in the East Devon National Landscape and requires very careful design to conserve and enhance the natural beauty of the site and its wider landscape setting. ~~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. ~~—~~as both a heritage asset and a locally valued community facility, including through the retention of appropriate car parking (sufficient to meet at least the needs of the public house as a going concern) and careful consideration of its setting. The preference is for highway access to this site to be gained from site Kilm_09b to the west.

Commented [A177]: To ensure consistency of wording with other allocations.

Commented [A178]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

Commented [A179]: To clarify that development should retain appropriate car parking and consider the setting of the Old Inn. This addresses concerns about the potential loss of the pub's car park, supports the continued viability of the listed building, and reinforces the need to avoid harm to its character, setting, or function.

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 for ~~-~~ 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 have been undertaken as part of the local plan.

The site is in the East Devon National Landscape and development should be informed by detailed assessment and design work to maximise~~s~~ opportunities to conserve and enhance the natural beauty of the site, its wider landscape setting and heritage assets in the vicinity of the site

Commented [A180]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape

A high quality scheme is required at this site which is likely to require some conversions and some new build. Development should conserve and enhance the conservation area, listed buildings and their settings, incorporating the historic

farmhouse and vernacular farm buildings (which are considered non-designated heritage assets) into a sympathetically designed scheme. Development should be designed to:

A. Maximises opportunities to conserve and enhance the natural beauty of the site, its wider landscape setting.

B. Secure a pedestrian link through the site, accessing The Street

C. Reflect the pattern typical of traditional village centre housing in Musbury by concentrating new development along the access road and orientating new buildings east-west and north-south to reflect the traditional settlement pattern in the village

D. Decreasing housing density to the south and east of the site, so that larger gardens and planting soften the transition from development to the adjacent countryside

E. Retain views through the site, particularly from the Conservation Area.

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 Council has prepared a draft Development Brief[25] for part of this site (though there is no longer an expectation of the site providing Gypsy and Traveller pitches).

Commented [A181]: Changes made and additional text added to policy to highlight heritage importance considerations

Commented [A182]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape and the historic village.

Commented [A183]: Change made to ensure Beer Quarry and Caves SAC concerns are appropriately addressed.

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, including access arrangements and active travel measures, ~~approach~~ to encompass the development of the two allocated sites- would be appropriate.

Commented [A184]: Change made to ensure travel and transport matters are appropriately addressed.

Land to the West of Badger Close (Newt_04)

[25] ~~Insert link to doc in evidence library~~ SAL-050 – Draft Baxter's Farm (Musbury) Development Brief, https://eastdevon.gov.uk/media/jjnhk2pg/sal-050-draft-baxter-s-farm-dev-brief.pdf

The site is allocated for ~~28~~ 20 dwellings. This site is in the East Devon National Landscape and development should be informed by detailed assessment and design work to maximises opportunities to conserve and enhance the natural beauty of the site and its wider landscape setting ~~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 because the wooded skylines are one of the special qualities of the national landscape that provide distinctiveness and ~~-~~orientation: development proposals should establish how this can be reinforced through layout and design.

-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, have appropriate lighting and be 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~~ 20 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, have appropriate lighting and be surfaced for use in all weather conditions. No houses shall be occupied until the full footpath is provided and made available for use. Pedestrian access to the site should be secured through Beech Close.

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)

Commented [A185]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

Commented [A186]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

Commented [A187]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

Commented [A188]: To ensure the path is attractive to users at all times.

Commented [A189]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

Commented [A190]: To ensure the path is attractive to users at all times.

Commented [A191]: To improve opportunities for existing residents to access improved footpath links away from busy routes with poor or non-existent pavements.

The site is allocated for 10 homes.

The site is in the East Devon National Landscape and development should be informed by detailed assessment and design work to conserve and enhance the natural beauty of the site and its wider landscape setting. This should include consideration of views from Behind Hayes across the site and to Anchoring Hill to the north.

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 through its layout, design, landscaping and limits on building heights. This should include identification of any key views to be conserved and enhanced.~~.~~ Vehicular access needs to be to the east/Orchard Drive.

Commented [A192]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

Commented [A193]: Change made to highlight importance of heritage considerations.

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.

Design and layout of proposals should be appropriate to this village gateway location and sensitively sited to ~~and appropriately~~ take account of both the topography, ~~of the site~~ with built development limited to the lower two-thirds 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.

Commented [A194]: For clarity of the expectation; to avoid repetition of the term “appropriate” and in response to indicative site layout submitted through Regulation 19 consultation.

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 up to 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. Careful consideration will need to be given to layout, building heights, design and landscaping. Development should conserve views of and from the grade I listed church and retain an open green space linking the church and its wider rural setting.

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 [A195]: Urbanisation could lead to substantial harm to a Grade I listed building. Historic England have requested flexibility in numbers to achieve optimum layout.

Commented [A196]: Change made to highlight importance of heritage considerations.

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~~ Prior to the occupation of the 10th dwelling, or other timetable that may be agreed through the determination of the planning application, that ~~delivering~~ part of the Sidbury to Sidmouth cycle route through the allocation should be completed and available for use~~.~~

Commented [A197]: Change added to ensure that tangible benefits are delivered in a timely manner from this major development in the national landscape.

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 development should be informed by detailed assessment and design work to conserve and enhance the natural beauty of the site and its wider landscape setting. -It is also located due east of Sidbury Castle, an Iron Age hill fort designated as a Scheduled Monument, the setting of which should be conserved and enhanced. Higher westerly parts of the site should therefore remain undeveloped and field boundaries should be reinforced with appropriate planting 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 heritage assets, and where possible to secure enhancements. This should include controls on building heights and materials, and the retention of a broad green corridor connecting Furzehill Farm with the wider rural setting.~~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 [A198]: Changes made to wording to stress importance of National Landscape and heritage considerations.

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, or on an alternative site within or adjoining the Tipton St John settlement boundary, is completed and occupied. Should a new school be built elsewhere in Tipton St John then the dwellings should occupy no more than 20% of this site, to include any access, landscaping, BNG or other associated works. Should a

Commented [A199]: DCC are considering alternative sites so this wording reflects that

Commented [A200]: This wording allows for a situation where a new school is built on an alternative site in the village and aims to ensure that the housing plots are not excessively large and that best use is made of greenfield land, given that the site will only accommodate 5 houses.

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.

The site is seen in the context of the East Devon National Landscape where careful design is needed to conserve and enhance the natural beauty of the site and its wider landscape setting. This is likely to require that new development is designed to have a fragmented floor plan with relatively narrow gables and limited eaves and ridge heights and no floodlighting of outdoor spaces. Careful consideration should be given to the layout of play areas and car parking to avoid large expanses of hard surfacing. Landscaping within and bounding the site should mitigate the loss of the hedgerow removed to achieve an access to the site and soften the appearance of any security fencing.

Commented [A201]: To ensure that the site is developed in a manner that maximises opportunities to conserve and enhance the natural beauty of the National Landscape.

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. Where development cannot be located outside of the area at risk for flooding (over the lifetime of development) an FRA will be required ~~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 so that ~~,~~ no gardens or other domestic features are sited within the area of flood risk.

Commented [A202]: To give policy clarity in respect of flooding concerns.

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. Development proposals should deliver a footway extension from the west and tie into the site. A pedestrian access opposite the Withey should be provided if compatible with protection of trees and highway safety. Careful attention should be paid to conserving and enhancing the setting of Slewton House, a Grade II listed building including through appropriate building heights, layout and landscaping. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Commented [A203]: Change made to stress heritage considerations.

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. 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. A sequential test has been undertaken as part of the local plan. Where

development cannot be located outside of the area at risk of flooding (over the lifetime of development) an FRA will be required to assess the risk of fluvial, surface water and groundwater flooding and therefore to inform development proposals so that no gardens or other domestic features are sited within the area of flood risk. Access would need to be off Bramley Gardens. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes. Prior to development, an archaeological investigation should be undertaken to understand the nature and extent of the structure noted in the Devon Historic Environment Record (HER no. MDV112700).

Commented [A204]: To update the policy following additional SFRA L2 work.

Commented [A205]: Text added to explicitly state archaeological matters and work that needs doing.

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[26] highlighting unprecedented warming and irreversible consequences. In response, ~~East Devon District Council~~EDDC declared a climate emergency in 2019, committing to carbon neutrality by 2040 and endorsing the Devon Carbon Plan[27].

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 across the whole local plan area including the Cranbrook Plan area.

[26] CCF-013 – 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]

[27] CCF-012 – 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: 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[28]) 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.

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

Commented [A206]: Ministers are publishing the Future Homes Standard this autumn and have confirmed today (Friday 6 June) that solar panels will be included, leading to installation on the vast majority of new build homes.

[28] CCF-019 – Future Homes and Buildings Standards: 2023 Consultation, https://eastdevon.gov.uk/media/2pwjvnag/cfl-021-the-future-homes-and-buildings-standards_-2023-consultation.pdf

106 agreement and developers will be required to submit a compliance certificate to demonstrate compliance following completion.

This policy applies across the whole local plan area including the Cranbrook Plan area.

6.3. Ensuring new developments are energy efficient is fundamental to reducing carbon emissions. The policy follows the "energy hierarchy~~,~~", which prioritises~~ing~~ improvements to the building's fabric and design before considering ~~improvements over~~ renewable energy technologies ~~retrofits~~. The accompanying graphic illustrates this approach, beginning with decisions about location and site layout, followed by measures to enhance insulation and the efficiency of heating, cooling, and lighting systems. It then considers renewable energy generation and offsite carbon reduction, concluding with the importance of ensuring buildings perform as intended once occupied. Major non-residential developments must meet BREEAM "Excellent" standards, a widely recognised third-party accreditation for sustainability.

Commented [A207]: Text explains relevance of graphic image - figure 7.

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.

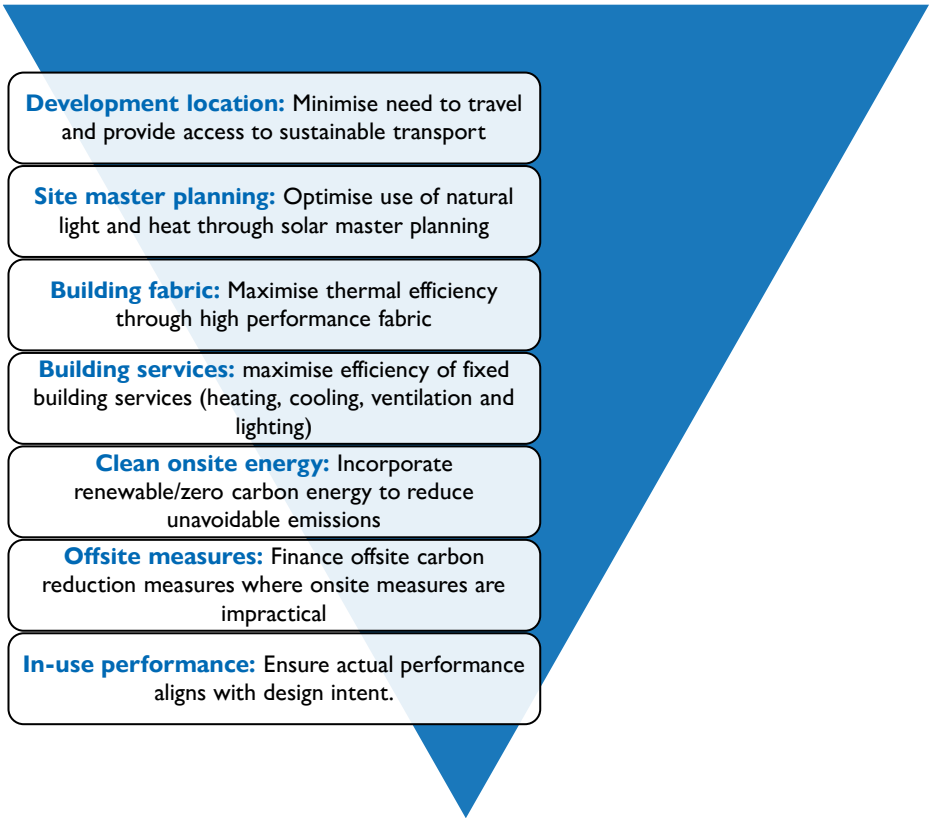


FIGURE 7 The Energy Hierarchy

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:

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 controlled waters/the water environment 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~~NLs 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. Domestic and other small-scale wind turbines will be preferred.~~Planning permission for fossil fuel-based energy generation installations ~~electricity or other energy generation~~ will only be granted where there is a clear and compelling need for backup or emergency power, such as to support critical infrastructure.~~the project that addresses a recognisable system failure, and~~ All viable renewable energy options, including energy storage solutions, must be thoroughly explored and demonstrated~~deemed~~ to be unsuitable before fossil fuels-based schemes can~~to~~ progress.

This policy applies across the whole local plan area including the Cranbrook Plan area.

Commented [A208]: In accordance with Environment Agency comments

Commented [A209]: Changes made to this paragraph remove the requirement for wind farms to be in specifically defined areas, noting that such areas no longer to be shown on the Policies Map. Whilst are definition is required under the 2023 NPPF there is a clear Government shift (as noted in the 2024 NPPF) to not require area definition. Policy change reflects this shift and places the onus on determination of wind farm applications to be in accordance with criterion in policy. Policy also provides clarity in respect of fossil fuel based energy generation proposals.

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 within 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 outside defined settlement boundaries 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.

131

Commented [A210]: Text is superseded by the fact that in policy we do not now refer to specific defined areas for wind energy generation.

Commented [A211]: This change avoids misinterpretation that only edge-of-settlement sites are acceptable and ensures the policy better reflects practical examples like Heathpark, which is within a built-up area but not on its edge.

Commented [A212]: Change adds precision.

This policy applies across the whole local plan area including the Cranbrook Plan area.

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 vehicle~~EVs, helping to manage increased electricity demand and support grid stability during peak periods. Alongside demand-side measures that ~~and~~ shift usage away ~~demand~~ from peak times, storage enables more flexible use of renewable energy and reduces reliance on fossil fuels.

Commented [A213]: Text amendment provides clarity.

6.10. ~~Favoured locations for~~ Energy storage proposals should be located where they can ~~are near suitable substations to~~ provide effective grid services, typically near suitable substations or grid infrastructure, subject to technical feasibility. The Low Carbon Study[29] highlights the importance of energy storage in achieving climate goals. Fire safety is a critical concern for ~~battery~~ Battery ~~energy~~ Energy ~~storage~~ Storage ~~systems~~ 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[30] 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.

Commented [A214]: New text adds clarity.

[29] CCF-011 – 2020 Low Carbon and Climate Change Evidence Base for the Greater Exeter Strategic Plan, https://eastdevon.gov.uk/media/x2snp2tx/cfl-013-uoe-2020-low-carbon-and-climate-change-evidence-base-for-gesp.pdf

[30] CCF-016, Grid Scale Battery Energy Storage System Planning - Guidance for FRS, : https://eastdevon.gov.uk/media/noabgwcf/cfl-018-grid-scale-battery-energy-storage-system-planning-guidance-for-frs-april-2023.pdf



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, applicants should provide justification in line with national guidance published by the Department for Energy Security and Net Zero (DESNZ)~~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.

Commented [A215]: Amendment provides greater clarity.

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 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 across the whole plan area including 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.[31] East Devon is well-positioned to embrace this trend, with existing networks at Cranbrook and Monkerton (located in the city of Exeter, close to the East Devon boundary).

6.13. The Low Carbon Study[32] 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. To support Policy CC05, applicants should assess the feasibility of connecting to existing or planned networks using national guidance published by the Department for Energy Security and Net Zero (DESNZ). This includes tools such as the Standardised Due Diligence Set and the Heat Network Financial Model, which help evaluate technical and financial viability. Where connection is not feasible, these resources should be used to justify exemption and demonstrate how future connection could still be achieved.

Commented [A216]: Text change provides clarity that Monkerton is in city of Exeter close to our border.

Commented [A217]: Explain the DESNZ guidance added to the policy.

[31] CCF-017 - The Future of Heating in UK Buildings, https://eastdevon.gov.uk/media/t52fmbbp/cfl-019-infographic-the-future-of-heating-in-uk-buildings-committee-on-climate-change.pdf

[32] CCF-011 – 2020 Low Carbon and Climate Change Evidence Base for the Greater Exeter Strategic Plan, https://eastdevon.gov.uk/media/x2snp2tx/cfl-013-uoe-2020-low-carbon-and-climate-change-evidence-base-for-gesp.pdf

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 across the whole plan area including the Cranbrook Plan area.

6.15. The environmental impact of producing construction materials is significant, with concrete alone responsible for 8% of global emissions[33]. 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[34], 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.

[33] CCF-023 - Making Concrete Change: Innovation in Low-carbon Cement and Concrete, https://eastdevon.gov.uk/media/yyinbvtm/ccf-025-making-concrete-change-cement.pdf

[34] CCF-024 – RICS Whole Life Carbon Assessment for the Built Environment (1st Edition 2017), https://eastdevon.gov.uk/media/4d3ntdky/ccf-026-whole_life_carbon_assessment_for_the_built_environment_1st_edition_rics.pdf

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)[35], 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 strongly encouraged to consult with ~~East Devon District Council~~EDDC, Devon County Council, the Environment Agency, and South West Water early in the planning process to address flood risk, prior to writing site-specific ~~Flood Risk Assessments (~~FRAs~~)~~, and proposing 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.~~

Commented [A218]: Text changes in this paragraph give greater clarity to the flood risk assessment requirements.Text deleted because a high level assessment has been undertaken comparing the new NAFRA2 datasets with the previous datasets to look for areas where there were more significant increases (5% increase in flood extent in the new mapping compared to previous). For most sites there is no significant change. The comparison has been shared with the Environment Agency and they have not requested that any additional work be undertaken.

Strategic Policy AR01: Flooding

All development must ~~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:

Commented [A219]: Changes made to this policy strengthen importance of flooding considerations and clarify application/meaning of policy tests. Redrafted policy, with changes made, is seen as stronger and more robust in respect of flooding matters.

A. Requiring applicants for 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~~FRA (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

[35] CCF-002 – Strategic Flood Risk Assessment Level 1, https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan-2020-2042/evidence-and-examination-library/climate-change-and-flooding-ccf/#article-content

exacerbating flood risk elsewhere and where possible will reduce flood risk overall. For areas within 5 metreers 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 infrastructureGI 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'[36]. Surface water run-off should be managed as close to the source as possible. Preference will be given to sSystems should that reduce pollution risks and contribute to the conservation and enhancement of biodiversity, water quality and green infrastructure GI where practicable. Within Critical Drainage Areas, SuDS should result in a reduction of existing runoff rates and comply with most up-to-date guidance on managing runoff;

D. Protecting land required for flood management, including natural floodplains;

E. Not permitting proposals for basements or car parks 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 will should be opposed in all circumstances except for essential access reasons, and day-lighting existing culverts will be promoted through new developments.

Where a Level 2 SFRA has been undertaken on an allocated site, the 'Requirements and guidance for site-specific FRAFlood Risk Assessment' set out in the relevant site

[36] CCF-022 – Sustainable Drainage System – Guidance for Devon, https://www.devon.gov.uk/floodriskmanagement/document/sustainable-drainage-system-guidance-for-devon-2023/ [accessed 16th Jan 2025]

sheet should be taken into account when submitting an application and designing a scheme.[37]

The SFRA has shown that some catchments are at a high risk of cumulative flooding[38]. In these areas, development proposals should help to reduce flood risk overall by demonstrating that:

A. The design and layout of the proposed development incorporates natural processes to reduce flooding where possible, particularly those ~~safeguards any areas~~ identified in the areas of potential Natural Processes Mapping[39] 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 across the whole plan area including the Cranbrook Plan area.

Commented [A220]: Will users of the policy know what this is and where to find it. It one of a number of technical terms used in policy - are they all referenced/footnoted etc?

Commented [A221R220]: I have added a footnote that links to it

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 quality and supply

7.4. Population growth and~~,~~ climate change ~~, and environmental protection measures~~ put pressure on the quality of water resources and~~,~~ these factors, plus environmental

[37] CCF-003 – Strategic Flood Risk Assessment Level 2, https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan-2020-2042/evidence-and-examination-library/climate-change-and-flooding-ccf/#article-content

[38] CCF-002 – Cumulative Impact Assessment (Parish Map), cfl-002a-2-cia-with-parishes-labelled.pdf

[39] ~~See Working with Natural Processes: Home Page for details and Working with Natural Processes: Map~~See: CCF-027 - Working with Natural Processes Map (JBA), https://naturalprocesses.jbahosting.com/Map [~~accessed 21st Oct 2025~~]

protection measures, also contribute~~ing~~ to water stress. East Devon is part of the Devon East management catchment and has water bodies in all of its operational catchments[40]. East Devon is also part of five coastal and estuarine water bodies[41]. -Of these terrestrial and marine water bodies only one has ~~as~~ a 'good' ecological status under the Water Environment Regulations, with 6 being classified as 'bad', 5 as 'poor' and the remaining 27 as 'moderate'. If development is not properly undertaken, the ecological status of these water bodies may decline and there are nationally and internationally recognised designations that could be detrimentally affected. National policies promote improving water quality and preventing development from contributing to unacceptable levels of water pollution. A Water Cycle Study (WCS)[42] has been undertaken to understand whether there is sufficient wastewater and water supply capacity for the new developments included in this plan and any implications for water quality. The development levels set out in the plan and a changing climate will have an impact on water resources, which are limited in East Devon and need to be managed and used effectively to meet the needs of the people and the natural environment. Water efficiency measures play a key role in reducing demand on water resources and accommodating growth in business, housing and population without the need to increase overall consumption. 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 WCS and the Environment Agency and South West Water 'Evidence for increased Water Efficiency' provide evidence for adopting the stricter standard of 110 litres per day in East Devon to address water stress. The WCS also identifies the Exe Estuary, River Axe and Otter Estuary to be at a high risk of nutrient loading due to the increases in wastewater production from proposed housing development. The WCS recommends infrastructure enhancements

[40] These are the Creedy, Exe, Clyst and Culm, Sid and Otter and the Axe and Lim - ~~see Devon East Management Catchment | Catchment Data Explorer~~see: CCF-028 – Catchment Data Explorer – Devon East Management Catchment, https://environment.data.gov.uk/catchment-planning/ManagementCatchment/3033 ~~{~~[accessed 21st Oct 2025]~~}~~

[41] These are the Axe Estuary, Exe Estuary, Otter Estuary, Lyme Bay West~~ see South West TraC Management Catchment | Catchment Data Explorer~~ see: CCF-029 - Catchment Data Explorer - South West TraC Management Catchment, https://environment.data.gov.uk/catchment-planning/ManagementCatchment/3086 and CCF-030 - Catchment Data Explorer - Lyme Bay East Water Body, https://environment.data.gov.uk/catchment-planning/WaterBody/GB620806560000 ~~and Lyme Bay East see - Lyme Bay East | Catchment Data Explorer | Catchment Data Explorer~~

[42] CCF-001 – Water Cycle Study, ~~https://eastdevon.gov.uk/media/a5tjaut0/ccf-001-the-east-devon-water-cycle-study.pdf *Insert link to WCS when available*~~

as a result. ~~This~~Strategic Policy AR02: W~~w~~ater quality and efficiency ~~policy~~ addresses these issues.

Commented [A222]: To clarify which policy does the addressing.

Commented [A223]: New supporting text added to provide background for much expanded policy.

Strategic Policy AR02: Water quality and efficiency

To protect, manage and improve water quality in all water bodies affected by development in East Devon:

Commented [A224]: Additional text added to ensure a strategic policy on water quality is added to plan in accordance with resolution of SPC on 02/09/2025

A. Planning permission will not be granted for any proposal which, because of inadequate provision of water services or inadequate or untimely provision of foul water and surface water drainage and disposal, would

1. cause pollution to the water environment, including coastal waters
2. result in the deterioration of the ecological status of a water body
3. overload the sewer network, or
4. result in an increase in flood risk at the site or elsewhere.

Where it can be demonstrated that planned infrastructure improvements will overcome the issue, consideration will be given to imposing an appropriate 'Grampian' condition.

B. Development that is likely to have a significant effect on a European Wildlife Site with respect to water will not be permitted until an Appropriate Assessment has ascertained that there is no adverse effect on the integrity of the site.

C. ~~minimise impact on the water environment a~~ All development should, wherever possible, seek opportunities to implement water efficiency, water storage and water ~~cycling~~ recycling measures. All new dwellings should achieve at least the Optional Technical Housing Standard of 110 litres per day per person for water efficiency as described by Building Regulation G2[43].

D. All development proposals must demonstrate what measures can reasonably be taken to enhance the water environment and make provision to incorporate any agreed measures into the development.

[43] CCF-020 – Approved Document G: Requirement G2 Water Efficiency, https://eastdevon.gov.uk/media/cjjht5ql/cfl-022-approved-document-g.pdf

E. Developers shall undertake thorough risk assessments of the impact of proposals on surface and groundwater systems, considering avoidance measures, and incorporate appropriate mitigation measures into the development where necessary. Any development likely to result in contamination of principal aquifers or within Source Protection Zones or Drinking Water Safeguarding Zones will need to demonstrate that groundwater and surface water is protected to prevent a deterioration of water quality and pollution of the water source[44].

This policy applies across the whole plan area including the Cranbrook Plan area.

Justification for policy

~~7.5.~~ This policy sets a framework to ensure that development protects and improves water quality in accordance with the NPPF. ~~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.~~

Commented [A225]: Suspect it would be good if we had a sentence or two to justify the higher standards, rather than just signposting elsewhere for justification.

Commented [A226]: Text amendments sets scene for policy wording more succinctly.

~~7.6.~~7.5. Coastal change

~~7.7.~~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. Much of the East Devon coast is part of the Dorset and East Devon Coast World Heritage Site, where allowing natural erosion to continue is the most effective way to maintain its 'Outstanding Universal Value'. This plan identifies potential impacts and develops policies to ensure risks are considered in development decisions.

Commented [A227]: Any merit in cross referencing here to approaches to World Heritage Site non-intervention?

Commented [A228]: Text clarifies importance of the World Heritage Site.

Coastal Change Management Areas

~~7.8.~~7.7. We have collaborated with the University of Plymouth to predict coastal erosion and flooding, mapping areas vulnerable to coastal change over

[44] Magic Map Application

the next 20, 50, and 100 years[45]. This work, aligned with the ~~National Planning Policy Framework~~NPPF, forms the basis for identifying Coastal Change Management Areas (CCMAs)[46]. Detailed assessments, such as Beach Management Plans, have refined these areas.

~~7.9.~~7.8. ~~T~~Since the University of Plymouth work was completed, the Environment Agency ~~will publish~~ has updated ~~national~~ National flood and ~~coastal~~ Coastal ~~erosion~~ Erosion Risk Mapping (NCERM) ~~risk data in January 2025, which will be considered before finalising the plan for submission~~. The CCMA's have been designated in the land between the high-water mark and whichever is the most landward line of either the 'Plymouth' or the NCERM 2105 Climate Change (Upper End) lines, with the exception of the land east of the River Sid,[47]. Given the complexity of this topic, supplementary planning guidance is recommended to detail the practical implementation of the CCMA approach. This will include advice on what should be included in a 'coastal change vulnerability assessment' and what evidence should be used to determine when coastal change can be expected to happen.

Commented [A229]: Changes made provide greater clarity in respect of application, use and importance of coastal and erosion risk mapping.

Policy AR03: Coastal Change Management Areas (CCMAs)

Within the Coast~~al Change Management Area (CCMA)~~ CCMA defined on the Policies Map, proposals for new dwellings~~residential development~~, including the conversion of existing buildings to residential use, will not be permitted.

Commented [A230]: Text added in response to July SPC meeting comments.

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, taking into consideration the latest NCERM, University of Plymouth mapping and any change in erosion rates from the implementation of coastal management schemes, so that:

Commented [A231]: To clarify how the rate of coastal change will be assessed.

~~0-to-20-year time horizon~~ **Short Term Risk Areas**

[45] CCF-006 – Coastal Change Management Areas Methodology Report, https://eastdevon.gov.uk/media/0q5lai3a/cfl-007-ccma-methodology.pdf

[46] CCF-005 – Coastal Change Topic Paper

[47] Further details on how the CCMA's have been designated is included in the Coastal Change Topic Paper – see: CCF-005(rev) – Coastal Change Topic Paper, - https://eastdevon.gov.uk/media/vzgh1v2l/ccf-005-rev-coastal-change-topic-paper-oct-25.pdf *~~Insert link to updated doc~~*

~~—~~In parts of the CCMA expected to be at risk of coastal change within ~~a 0 to~~ 20-years of the application ~~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.

~~D.~~E. Ministry of Defence installations that require a coastal location, subject to any material impacts on coastal processes being managed to minimise adverse impacts on other parts of the coast.

~~20-to-50 year time horizon~~ Medium Term Risk Areas

In parts of the CCMA expected to be at risk of coastal change between ~~within a~~ 20-to-50 years from the application ~~time horizon (2040 to 2090)~~, in addition to the development allowed within 20 years ~~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~~ Long Term Risk Areas

In parts of the CCMA expected to be at risk of coastal change between ~~within a~~ 50 to 100 years from the application ~~time horizon (beyond 2090)~~, in addition to the development allowed within ~~the 0 to~~ 50 years ~~zones~~, extensions to residential properties and householder applications may be acceptable if it is demonstrated that they will not exacerbate rates of coastal erosion~~.~~

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 applications must also show that the surface water run-off implications of the proposal have been fully considered and found to be acceptable, including implications for coastal erosion.

Commented [A232]: Change made In accordance with Paragraph 73 of Flood risk and coastal change - GOV.UK to highlight specific allowance for Ministry of Defence installations.

Commented [A233]: Change made In accordance with Paragraph 73 of Flood risk and coastal change - GOV.UK to highlight specific allowance for Ministry of Defence installations.

Commented [A234]: Text added in response to July SPC meeting comments.

Commented [A235]: To ensure that erosion risks from surface water in relation to development are properly considered.

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

~~7.10.~~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[48] 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

~~7.11.~~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;

[48] CCF-008 – Shoreline Management Plan, https://environment.data.gov.uk/shoreline-planning/shoreline-management-plan/SMP16#actionplan [accessed 13th Jan 2025]

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 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

~~7.12.~~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

~~7.13.~~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 (WHS), 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 support ~~promote~~ proposals for sustainable coastal change management such as improvements to coastal defences or managed realignment. Careful consideration will be given to any adverse economic, social or environmental impact, including visual impact on protected landscapes. ~~, 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 / Jurassic Coast ~~World Heritage Site,~~WHS, the natural processes that created it will be allowed to continue,

Commented [A236]: To better reflect the need to balance potentially conflicting interests following comments from the EA.

Commented [A237]: Clarification

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~~WHS have been fully considered. These same considerations will also apply to the Sidmouth to West Bay SAC which also depends on coastal processes.

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

~~7.14.~~7.13. This policy balances the need for protective measures with the integrity of the ~~World Heritage Site~~WHS, 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[49]. In cases that may affect the ~~World Heritage Site~~WHS, the specific requirements of Policy PB10 will also apply. In certain circumstances it will be necessary to notify UNESCO regarding development proposals that may affect the WHS, as set out in paragraph 172 of the Operational Guidelines for the Implementation of the World Heritage Convention.

Commented [A238]: Changes made to highlight role and need to contact UNESCO where development may have impacts and also to be consistent with other local plans that cover the WHS

Links to marine planning

~~7.15.~~7.14. The NPPF requires local plans to consider the UK Marine Policy Statement and marine plans. The South Marine Plan[50] covers marine activities and overlaps with land planning in the intertidal zone. No conflicts have been identified between the marine and local plans.

[49] CCF-007 – East Devon Beach Management Plans, https://eastdevon.gov.uk/beaches-harbours-and-coastal-information/coastal-protection/beach-management-plans/

[50] CCF-021 – 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.

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 across the whole plan area including 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[51], which identifies local housing demands and needs for specific groups.~~

Commented [A239]: The housing needs assessment is referred to further in in plan text and does not need referencing here.

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

[51] ~~HOU-002 – Local Housing Needs Assessment - https://eastdevon.gov.uk/media/3724890/east-devon-lhna-final-accessible-160922.pdf~~

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 6 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~~ Marlcombe	~~New community~~ An aspiration for 40% subject to ~~be defined through~~ grant funding and bespoke viability work for the new community ~~– to be defined through further Reg 19 consultation.~~	An aspiration for: • ~~New community~~ 65% Social Rent • 35% other forms of affordable housing subject to grant funding and ~~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 (excluding exception sites under Policy HN10) across any part of East Devon, inside or outside settlement boundaries, that is not allocated for housing development. **30% affordable housing at:**	• 65% (at least) 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.

Commented [A240]: Changes reflect Marlcombe provision

Commented [A242]: To establish it is at last 65% social rent but that the residual 35% can be of any form.

Commented [A241]: To address potential contradiction in interpretation of policy.

	All other local plan allocated sites (with the exception of those at Axminster). **25% affordable housing at:** • Axminster, as falling within the Settlement Boundary.	

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 specific examples, where if evidence demonstrates schemes are viable, provision may be most applicable in the form of off-site contributions. ~~are exempt from this policy.~~

This policy applies across the whole of the local plan area including the Cranbrook Plan area, except areas that fall within Built-up Area Boundaries defined in the Cranbrook Plan.

Commented [A243]: Text change highlights that in the listed examples there can be viability challenges and also that they are cases, esp. for care homes, where contributions for off-site provision may be most appropriate.

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[52], ensuring it meets the district's needs and whole plan viability assessment that justifies policy levels[53]. The Council will be producing new more detailed guidance, potentially in the form of Supplementary Planning Document, on affordable housing delivery and requirements. Specific guidance may be needed for Marlcombe.

Commented [A244]: To advise of SPD production which is seen as needed.

[52] ~~HOU-002 – Local Housing Needs Assessment – https://eastdevon.gov.uk/media/3724890/east-devon-lhna-final-accessible-160922.pdf~~ HOU-002(rev) – East Devon Local Housing Needs Assessment (Oct 2025), https://eastdevon.gov.uk/media/ojafpln0/hou-002-rev-east-devon-local-housing-needs-assessment-2025.pdf

[53] CSD-004 – East Devon Local Plan Viability Assessment, *link to be added*

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:

- Residential care homes and nursing homes;
- Extra care housing or housing-with-care;
- Retirement living or sheltered housing;
- Age-restricted general market housing.

Any development proposals with housing to accommodate older people should ~~will need to~~:

A. 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;

B. Be l~~L~~ocated ~~all older person housing~~ within 400 metreers walking distance of local facilities and shops;

C. Be well-served by public transport;

D. 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;

E. Provide adequate communal facilities, including on-site accommodation where required, for essential staff;

F. 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);

Commented [A245]: Wording included in error.

Commented [A246]: Wording change adds a degree of flexibility.

Commented [A247]: Change makes intent/expectations of policy clearer.

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 commercial~~ly~~ viability, will be required to deliver specialist housing for older people (where possible meeting all of criteria A to F above) as follows:

A. Schemes for 50 to 199 dwellings should include at least 10% of dwellings on-site as specialist older person dwellings (Use Class C3);

B. 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 net loss of specialist elderly person housing will be refused unless:

A. Evidence demonstrates that there is no longer a need in East Devon for that type of housing; and

B. 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 across the whole of the local plan area but 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 [A248]: Change made because on some mainstream housing sites (sites where we seek to apply policy clauses to secure an element of elderly person housing) it may be that all of A to E cannot be met, for example mainstream sites may be more than 400 metres from shops and facilities.

Commented [A249]: Amended to clarify that replacement schemes where no net loss are not covered by the following criteria.

Commented [A250]: Change highlights potential viability issues at Cranbrook.

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

Commented [A251]: Text not needed as this evidence is referenced elsewhere and policy is generic in nature.

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[54] 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~~ At least 50 % of all new dwellings will meet- building regulation M4-(2) requirements (accessible and adaptable dwellings) or higher standards than this;

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;

Commented [A252]: We have an updated housing needs assessment from ORS (dated October 2025). In Figure 59 of this work it identifies a need for accessible future housing set against future housing provision at a higher level of 43%. The 43% is a gross total and is what would be needed if all those in need were to move into a new build/converted accessible home. However, there is also a lower level of 17% and this is a net figure of need and is arrived at on the basis of applying an assumption that all those in need living in an existing house that could be adapted were to do see/have it adapted. Whether a household might adapt is an unknown and with an aging population, broader aspirations for planning for providing for all in society and accepting that some schemes will not/cannot deliver against policy (including for legitimate planning reasons) a 50% target is deemed reasonable. In contrast a 100% target is very aspirational and is not supported by evidence, it also has viability impacts.

[54] HOU-019 – Refresh of the Commissioning Strategy for Extra Care Housing, https://eastdevon.gov.uk/media/iuolruet/hou-020-exter-care-housing-needs-2015.pdf

D. At least ~~5%~~ 15% of all new affordable housing for rent or affordable home ownership will meet building regulation M4 (3) (2) (a) or (b) requirements (wheelchair adaptable/wheelchair accessible)~~; 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 across the whole plan area including the Cranbrook Plan area.

Commented [A253]: Criterion D and E are combined, as they essentially provide repetion. Minor wording changes provide extra clarification.

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)[55].

8.12. The East Devon Local Housing Needs Assessment ~~2022~~ 2025 [56]highlights the growing need for accessible homes in large part driven by ~~due to~~ an ageing population. By ~~2040~~ 2042 the work shows~~,~~ an additional ~~12,959~~ 8,343 households will need either adaptations to their existing homes or new accessible housing. Policy provision is justified by evidence in the Housing Needs Assessment.

Commented [A254]: Text amendments made to refer to new housing evidence (ORS report dated October 2025) and also to amend plan end date to 2042 and provide clarity.

8.13. ~~The~~ Based on needs assessment and in response to and recognition of an ageing population with specific needs policy specifies that ~~100%~~ 50% 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~~ accessible dwellings.

Commented [A255]: Text changes made to note changes in Policy to 50% accessible housing requirement.

[55] HOU-018 – The Building Regulations 2010 Approved Document M Volume 1: Dwellings, https://eastdevon.gov.uk/media/sewn1m23/hou-016-approved-document-m-volume-1.pdf

[56] ~~New Ref number needed for East Devon Local Housing Needs Assessment October 2025 – Matt to forward document to Ryan for inclusion in evidence Library~~HOU-002(rev) – East Devon Local Housing Needs Assessment (Oct 2025), https://eastdevon.gov.uk/media/ojafpln0/hou-002-rev-east-devon-local-housing-needs-assessment-2025.pdf

8.14. At least ~~5%~~ 15% of new affordable housing for rent and homeownership must meet M4(3) requirements, addressing the need for wheelchair accessible or adaptable ~~and accessible~~ homes, a figure evidenced in the updated houing needs assessment. 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.

8.15. The policy aligns with national guidelines, including the NPPF and PPG[57] 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~~ Building Regulations still 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 generally supported within settlement boundaries and as part of any housing permitted in other

Commented [A256]: Percentage updated from 5% to 15% following text set out in para 7.74 of the updated housing needs assessment. Minor change to give accuracy to wording.

Commented [A257]: Text not needed and is out of date in respect of needs assessment.

Commented [A258]: Text amendments makes it clear that as a minimum it is Building Regulations - Part M4(1) that must be complied with.

[57] KSD-007 – Planning Practice Guidance (PPG), https://www.gov.uk/government/collections/planning-practice-guidance [accessed 13th Jan 2025]

areas. This policy does not apply to areas ~~that~~ that fall within Built-up Area Boundaries defined in the Cranbrook Plan, where Policy CB11 of the Cranbrook Plan will apply'.

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 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 of the phase of development that they are located with-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 across the whole of the local plan area including the Cranbrook Plan area, except areas that fall within Built-up Area Boundaries defined in the Cranbrook Plan.~~

Commented [A259]: Policy amended to make it clear that it only applies to land within settlement boundaries or any housing permitted in other areas. The change avoids possible misinterpretation that is allows for self builds outside of other local plan policy constraints. Amendment also clarifies applicability at Cranbrook.

Commented [A260]: To provide additional clarity

Commented [A261]: Text deleted due to lack of justification and difficulty of enforcing.

Commented [A262]: Text deleted as relevant text now included at the start of the policy.

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 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[58], 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[59] 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. A topic paper has been prepared to support this policy.[60]

[58] HOU-016 – Self-build and Custom Housebuilding Act 2015, https://www.gov.uk/guidance/self-build-and-custom-housebuilding [accessed 9th Jan 2015]

[59] HOU-017 – Self-build and Custom build Monitoring, https://eastdevon.gov.uk/planning/planning-policy/housing-issues/self-build-and-custom-build/

[60] ~~Insert link to CSB paper~~ HOU-015 – Custom and Self-Build Topic Paper, https://eastdevon.gov.uk/media/vnjf1feu/hou-015-csb-topic-paper-second-reg-19.pdf ~~*link*~~

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 or replacement 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.

Replacement of existing dwelling or conversion of an existing building outside of a Settlement Boundary - exceptionally, where a replacement dwelling or building conversion can be 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 massing shall 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 across the whole local plan area including 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, compared to knocking them down and putting up new buildings ~~building~~ often results in a reduced ~~reduces the~~ carbon footprint and promotes sustainable development. The policy restricts replacing existing buildings ~~to exceptional circumstances~~, aligneding with the embedded carbon policy.

Commented [A263]: Change provides clarity.

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 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 https://eastdevon.gov.uk/housing-and-homelessness/existing-council-tenants/housing-strategies-and-policies/housing-strategy-2020-2024/ 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.

Commented [A264]: Web link added, but in due course should put into footnote and evidence library.

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 respond appropriately to the character of the building and area 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[61] 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.

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 across the whole plan area including the Cranbrook Plan area, but only outside of Cranbrook Plan Built-up Area Boiundaries.

Commented [A265]: To add relevance to policy of relationship with surrounding area.

[61] HOU-007 - Technical housing standards – nationally described space standard - GOV.UK, https://eastdevon.gov.uk/media/yijhtay2/hou-006-technical-housing-standards-nationally-described-space-standard.pdf

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, unless exceptional planning grounds are justified (noting specific policies allow for development beyond settlement boundaries) should not create additional dwellings in the countryside.

Commented [A266]: Text amended to clarify that it is not an absolute that new dwellings are not allowed 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.

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 Houses in Mmultiple 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 and cycle 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.

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 across the whole plan area including the Cranbrook Plan area.

Commented [A267]: Wording is spurious/incorrectly included and cycle storage moved to come under criterion C.

Commented [A268]: Cycle storage reference is seen as better made under this criterion. Plus reference to bin collection not seen as needed or appropriate.

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.

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~~ be considered against 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~~ within a reasonable distance of 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.~~B. ~~To not exceed 15 pitches as a maximum~~ Sites should ideally consist of up to 15 pitches in capacity unless there is clear evidence to suggest that a larger site is preferred by the local Gypsy or Traveller community and this can be managed appropriately and accommodated without detriment to local amenity or the services and infrastructure available;

~~D.~~C. To ~~be assimilated into the surrounding landscape without significant adverse effect~~ not have a significant adverse effect on the local landscape;

~~E.~~D. To have acceptable vehicular access, on site turning, parking and servicing;

~~F.~~E. 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.~~F. 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.

Commented [A269]: Policy wording changes agreed by SPC on 2nd Sept 25 to align with (most of) DCC/Friends,Family,Travellers comments

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~~:~~

~~T~~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~~

~~T~~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.

The loss of sites will be strongly resisted. 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 across the whole plan area including the Cranbrook Plan area.

Justification for policy

8.41. The Gypsy and Traveller Accommodation Assessment (2024)[62] identifies a need for around ~~32~~ 29permanent 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~~

Commented [A270]: This figure needs to be extrapolated as the GTAA study covered a longer timescale. Reducing the end date to 2042 requires fewer pitches

Commented [A271]: Wording correcting as all pitches will be delivered in the plan period.

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

~~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[63] 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.

~~**8.45.**~~

~~**8.46.** 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.~~

Commented [A272]: This site has been deleted as it is subject to technical constraints and the landowner has not confirmed it is available

Commented [A273]: Text deleted as it is a repetition and misleading.

~~**8.47.**~~**8.45.** Planning practice guidance requires local plans to identify a five-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.~~

~~**8.48.**~~**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

~~**8.49.**~~**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.

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

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

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~~EDDC, 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 across the whole plan area including the Cranbrook Plan area, but only outside of Cranbrook Plan Built-up Area Boundaries.

Justification for policy

~~8.50.~~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, https://eastdevon.gov.uk/housing-and-homelessness/existing-council-tenants/housing-strategies-and-policies/housing-strategy-2020-2024/strategic-context/

Commented [A274]: Web link added.

~~8.51.~~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.

~~8.52.~~8.50. The East Devon Local Housing Needs Assessment 2025 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

~~8.53.~~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

~~[64] HOU-002 – Local Housing Needs Assessment - https://eastdevon.gov.uk/media/3724890/east-devon-lhna-final-accessible-160922.pdf~~

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.

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 across the whole of the local plan area including the Cranbrook Plan area, except areas that fall within Built-up Area Boundaries defined in the Cranbrook Plan.

Justification for policy

~~8.54.~~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.

~~8.55.~~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.

~~8.56.~~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.

~~8.57.~~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.

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,

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~~ than 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 across the whole local plan area including the Cranbrook Plan area.

Commented [A276]: Typo

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



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[65] 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.

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

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

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. proposals 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; and

C. Capable of adaptation or re-use without major re-building, alteration, or extension.~~; and~~

New Agricultural buildings

New agricultural buildings and/or buildings intended for intensive agricultural activities will be permitted where there is a proven agricultural need for the development and all of the following criteria are met:

A. It is well integrated with its surroundings and closely related to existing buildings, being of appropriate location, scale, design and materials so as not to harm the character, biodiversity and landscape of the rural area particularly within the ~~National landscapes~~NLs.

B. It will not be detrimental to the amenity of nearby residents on grounds of smell, noise or fly nuisance.

Commented [A277]: This was requested by DM officers as the agricultural building policy in the current local plan is well used

C. It has been established that there are no other suitable buildings on the holding or in the vicinity which could meet the reasonable need.

D. All clean roof and surface waters will be drained separately from foul drainage and foul drainage will not discharge to any watercourse in order to prevent pollution of the water environment. Proposals for the development of new large scale buildings for livestock or for other use that could have polluting impacts should be accompanied by a Waste Management Plan.

This policy applies across the whole of the local plan area including the Cranbrook Plan area, except areas that fall within Built-up Area Boundaries defined in the Cranbrook Plan.

D~~Any d~~evelopment permitted in accordance with this policy should be readily accessible via a range of modes of transport (this will not apply to new agricultural buildings), be socially and environmentally acceptable and be compatible with overall plan strategy and other local plan policy considerations. New agricultural and commercial buildings will be expected to demonstrate that water efficiency measures have been included wherever possible

~~This policy applies across the whole of the local plan area including the Cranbrook Plan area, except areas that fall within Built-up Area Boundaries defined in the Cranbrook Plan.~~

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 ~~any~~ viability statement[66] to support a planning application 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 would 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 across the whole plan area including the Cranbrook Plan area.

Commented [A278]: To provide clarity that a viability statement may be of use to support an application. A web link will be added to the plan text.

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

[66] ECN-017 - Viability Statement Guidance, https://eastdevon.gov.uk/media/i5lj4cb1/ecn-015-viability-statement-guidancedocx.pdf

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[67] produced in accordance with guidance on the Council's website showing how the proposal will complement and not prejudice current agricultural activities. New uses must be appropriate, considering their impact on the

Commented [A279]: Text added to clarify that proposals should not compromise current agricultural operations.

[67] ECN-017 - Viability Statement Guidance, https://eastdevon.gov.uk/media/i5lj4cb1/ecn-015-viability-statement-guidancedocx.pdf

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~~are 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

Commented [A280]: To make it more concise

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[68]; or

E. There is a lack of demand for the current type of employment use at the site, evidenced by a compliant marketing statement[69] 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[70].

~~Exceptionally, t~~T Exceptionally, the use of any employment sites for non-employment uses will only 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 across the whole plan area including the Cranbrook Plan area.

[68] ECN-017 - Viability Statement Guidance, https://eastdevon.gov.uk/media/i5lj4cb1/ecn-015-viability-statement-guidancedocx.pdf
[69] ECN-014 - Marketing Statement Guidance, https://eastdevon.gov.uk/media/uaqnwowh/ecn-012-marketing-statement-guidance.pdf
[70] ECN-015 - Supply Statement Guidance, https://eastdevon.gov.uk/media/upgnaw55/ecn-013-supply-statement-guidance.pdf

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.

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[71].

This policy applies across the whole plan area including the Cranbrook Plan area.

Commented [A281]: @Ryan Oliver , please can you add the footnote here

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~~is available on the Council's website.

[71] ECN-018 – Employment and Skills Plan Guidance, https://eastdevon.gov.uk/media/pw2cqjpa/ecn-018-employment-and-skills-plan-guidance.pdf

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[72]~~. It emphasises the importance of STEM (Science, Technology, Engineering and Mathematics) education, technical qualifications, and employer investment in workforce development.

Commented [A282]: This is no longer relevent

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[73] 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.

~~[72] ECN-008 – Levelling Up the United Kingdom, https://eastdevon.gov.uk/media/hjjm23xj/ecn-008-levelling_up_the_united_kingdom__accessible_version_.pdf~~

[73] ECN-00~~8~~9 – Client-Based Approach, https://eastdevon.gov.uk/media/wggd3bpm/ecn-009-english-client-based-approach-contractor-guidance.pdf

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.

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 across the whole plan area including 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[74].

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

[74] ~~GEV-001~~ KSD-010– 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 ~~https://eastdevon.gov.uk/media/q3ndtwjn/gev-001-role-and-function-of-settlements_report_v3-final-draft-for-spc.pdf (may need new link)~~

- 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[75] 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

[75] 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

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[76]. 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

[76] ECN-014 - Marketing Statement Guidance , https://eastdevon.gov.uk/media/uaqnwowh/ecn-012-marketing-statement-guidance.pdf

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[77] 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.

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 across the whole of the local plan area including 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 at Cranbrook.

[77] 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.

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[78].

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.

[78] ECN-014 - Marketing Statement Guidance , https://eastdevon.gov.uk/media/uaqnwowh/ecn-012-marketing-statement-guidance.pdf

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

of any nearby centre[79].

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 alternative. Evidence should be outlined in marketing and viability statements[80], 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.

[79] 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.

[80] ~~Marketing Statement Guidance , Viability Statement Guidance~~ ECN-014 - Marketing Statement Guidance, https://eastdevon.gov.uk/media/uaqnwowh/ecn-012-marketing-statement-guidance.pdf , ECN-017 - Viability Statement Guidance , https://eastdevon.gov.uk/media/i5lj4cb1/ecn-015-viability-statement-guidancedocx.pdf

The first part of SE08 (Provision of new shops or services) applies to the Local Plan area excluding Cranbrook; the second part (Loss of existing local shops or services) applies to the whole Local Plan area including Cranbrook.

~~**The first part of SE08 (Provision of new shops or services) applies to the Local Plan area excluding Cranbrook; the second part (Loss of existing local shops or services) applies to the whole Local Plan area including Cranbrook.**~~

Commented [A283]: Text moved from supporting text to actual policy

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[81].

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.

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.

[81] ~~Marketing Statement Guidance , Viability Statement Guidance~~ ECN-014 - Marketing Statement Guidance, https://eastdevon.gov.uk/media/uaqnwowh/ecn-012-marketing-statement-guidance.pdf , ECN-017 - Viability Statement Guidance , https://eastdevon.gov.uk/media/i5lj4cb1/ecn-015-viability-statement-guidancedocx.pdf

and provided that:

D. 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);

E. The proposal does not harm the rural character of the surrounding natural or historic environment, or the amenities of the locality;

F. The local road network and access to the site can safely accommodate the extra traffic generated by the proposal; and

G. 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 across the whole of the local plan area including the Cranbrook Plan area, except areas that fall within Built-up Area Boundaries defined in the Cranbrook Plan.

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:

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.

In order to provide such evidence, applicants will be required to submit a Sustainable Tourism Statement[82] 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 across the whole plan area including the Cranbrook Plan area.



FIGURE 11 Beer Village Centre

[82] ECN-016 - Sustainable Tourism Guidance, https://eastdevon.gov.uk/media/jvifhpt5/ecn-014-sustainable-tourism-policy-guidance.pdf

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[83]. Redevelopment should prioritise more suitable tourist or community uses, especially in areas like the Coastal Preservation Area (CPA).

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. Noting, however, that there can be adverse biodiversity impacts association with tourism development and associated recreation impacts that increased tourism activity can give rise to at protected sites.

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.

[83] ~~Marketing Statement Guidance , Viability Statement Guidance~~ ECN-014 - Marketing Statement Guidance, https://eastdevon.gov.uk/media/uaqnwowh/ecn-012-marketing-statement-guidance.pdf , ECN-017 - Viability Statement Guidance , https://eastdevon.gov.uk/media/i5lj4cb1/ecn-015-viability-statement-guidancedocx.pdf

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~~NLs, ~~, Coastal Preservation Areas~~CPAs 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;

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~~ Biodiversity ~~net~~ Net ~~gain~~Gain (BNG); 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.

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)~~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~~NLs 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~~ Nationally ~~described~~ Described ~~space~~ Space ~~standard~~ Standards (NDSS)[84] 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.[85] 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~~ 42 to ensure the Plan's deliverability.

[84] HOU-007 - Technical Housing Standards - Nationally Described Space Standards, https://eastdevon.gov.uk/media/yijhtay2/hou-006-technical-housing-standards-nationally-described-space-standard.pdf

[85] 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~~ Guide 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;

Commented [A284]: Text deleted as guidance is now very old.

Commented [A285]: Reference to Code corrected to Guide

Commented [A286]: Punctuation error

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;
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;

~~5. and~~

D. Meet nationally ~~and locally~~ described space standards[86];

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 (limiting the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation) 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;

Commented [A287]: "Locally" removed as we do not have any locally defined.

Commented [A288]: Text added to highlight and address light pollution considerations.

[86] HOU-007 - Technical housing standards – nationally described space standard, https://eastdevon.gov.uk/media/yijhtay2/hou-006-technical-housing-standards-nationally-described-space-standard.pdf

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 (or an alternative approach for historic buildings under policy CC02), 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;
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 across the whole local plan area including the Cranbrook Plan area but does not supersede any Cranbrook Plan policies.

Commented [A289]: New wording adds flexibility of approach into policy.

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 Guide[87] and National Model Design Code[88], 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.

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~~ seek to maximise the number of new homes and density of development of any ~~the~~ site but to do so in a manner that is compatible with site setting and characteristics and which conserves or enhances the character of the area especially in a National Landscape and makes efficient use of land.

[87] HRD-003 – National Design Guide, https://eastdevon.gov.uk/media/45hnoxhb/hrd-003-national-design-guide.pdf

[88] HRD-001 – National Design Code Part 1, https://eastdevon.gov.uk/media/giyl0kst/hrd-001-national-model-design-code-pt1-the-coding-process.pdf ; HRD-002 – National Design Code Part 2: Guidance, https://eastdevon.gov.uk/media/grrfnhte/hrd-002-national-model-design-code-pt2-guidance-notes.pdf

Proposals for ~~major~~ developments of 50 or more dwellings ~~schemes~~ and those in environmentally or heritage sensitive locations especially in or adjacent to a National Landscape 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.

Commented [A290]: Changes to policy highlight sensitivities in National Landscape areas and increases size threshold at which a design code is needed. For smaller sites codes are seen as over prescriptive/not needed. Changes also establish that a maximisation of density/number of homes built on any site is sought but with character safeguards built in.

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:

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;

~~D.~~E. Where illuminated, the type and level of illumination should reflect the general level of lighting in the area.

This policy applies across the whole plan area including 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[89].

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~~GI Principles[90];

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

[89] ENV-011 - Natural England's Green Infrastructure Framework - https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx [accessed 8th Jan 2025]
[90] 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

recovery and restoration of wildlife rich habitats; is integrated with and connects to the surrounding landscape; and provides multi-functional ~~Green Infrastructure~~GI 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 across the whole plan area including 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 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[91] 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~~BNG, Local Nature Recovery Strategies, Nature Recovery Network (NRN), and Natural Capital. GI provision can ~~fully~~ count towards ~~Biodiversity Net Gain~~BNG delivery. The council will look to produce a standalone ~~Green Infrastructure~~GI Design Guide and/or to incorporate ~~Green Infrastructure~~GI measures into other design guidance to also help inform implementation of policy.

Commented [A291]: Delete unnecessary wording

Commented [A292]: The GI cannot necessarily always fully count, so wording is deleted.

[91] 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

Local Cycling and Walking Infrastructure Plans[92], Local Transport Plan 4[93], and the Bus Service Improvement Plan[94]. Transport modelling is underway to consider the impact of development across the wider area covering East Devon, Exeter, Mid Devon and Teignbridge.

Commented [A293]: Word missing

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

Development should be located and designed to ensure that ~~W~~walking, wheeling, cycling and public transport ~~should be~~are 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.

Commented [A294]: For clarity, suggested by EDDC Development Management team..

New development (specifically including where land is allocated for development) should facilitate access to high quality public transport through its location, layout, and,

[92] TRI-004 - Cycling and Multi-Use Trail Network Strategy, https://eastdevon.gov.uk/media/3ifdkvrm/tri-004-cycle-and-multi-use-strategy.pdf

[93] 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]

[94] 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

where necessary, contributions to public transport services and/or facilities (for example, bus services, bus stops, bus priority measures, rail infrastructure). In 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 across the whole plan area including 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).[95] 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

[95] 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

under two miles,[96] 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.

11.8. Sustainable travel 'mobility hubs' can promote walking, cycling, and public transport by providing facilities like secure cycle storage, bike hire, ~~electric vehicle~~EV 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 through later developments in adjoining or nearby areas.

The following proposed transport sites and routes will be protected from other development that would~~ill~~ preclude their delivery.

Strategic cycle network schemes:

[96] 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

- Clyst Valley Trail
- Sidford to Sidbury
- Cranbrook to Exeter (E3)
- Otter Trail
- Beer to Axminster and Uplyme

Public transport:

- Railway passing loop(s) as necessary between Honiton and Cranbrook.
- Bus priority route at A3052/A376 to M5 Junction 30.

Road schemes:

- Alterations/improvements to Clyst St Mary roundabout (A3052/A376)
- Alterations/improvements to A30 Airport Junction
- The route of Axminster relief road.

This policy applies across the whole plan area including the Cranbrook Plan area.

Commented [A295]: To reflect Devon County Council consultation response; and the adoption of the Countywide Local Cycling and Walking Infrastructure Plan.

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 people and/or vehicle movements, planning permission will not be granted unless they are supported by a transport statement or transport assessment, and a 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.~~C. Cumulative impacts of other development in the area; and

~~E.~~D. Whether there are particular types of impacts that require further evaluation, such as traffic generation at peak times.

Where sustainable travel measures are insufficient to mitigate unacceptable highway safety impacts or there are severe cumulative adverse impacts associated with additional traffic demand, proposals should identify and deliver (or contribute to the delivery of) any necessary highway improvements to the local and/or strategic road network. Where it is not possible to address such impacts, planning permission should be refused.

This policy applies across the whole plan area including the Cranbrook Plan area.

Commented [A296]: To reflect National Highways consultation response.

Commented [A297]: Typo - missing word.

Commented [A298]: To reflect consultation response stating it is unclear on why this point is required..

Commented [A299]: To reflect consultation response that this point was unclear.

Commented [A300]: To reflect National Highways consultation response.

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~~thoroughly assess the transport implications of development, and transport statements offer a lighter-touch approach for limited impacts.

Commented [A301]: Typo.

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 also provides for ~~electric vehicle~~EV charging.

Policy TR04: Parking standards and electric vehicle charging provision

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	1 per 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
Type/Use	**Car Parking**	**Short Stay Cycle Parking (obvious, easily accessed and close to destination)**	**Long Stay Cycle Parking (secure and ideally covered)**
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~~ EVs and electric bikes.

For wider environmental benefits but specifically to reduce fossil fuel vehicle emissions adversely impacting on the Pebblebed Heaths SAC/SPA (and therefore offering potential scope to address Habitat Regulation considerations and provide mitigation to allow for development to proceed) residential and commercial development proposals should seek to accord with the following:

a. For residential developments, and wherever possible, numbers off-street and on-street parking spaces that are served by EV charging should aim to exceed Building Regulation standards and they should be designed for ease of use and have immediate availability for property occupiers at the point at which they take up occupancy.

b. Non-residential developments with more than 10 off-highway vehicle parking spaces should seek to secure at least 30% of spaces with EV charging, a figure in exceedance of Building Regulation requirements.

c. Developers promoting major development will be expected to work with energy companies, distribution network operators and the planning authority to ensure the development of relevant and appropriate smart energy infrastructure is planned and installed to provide current and future EV capacity.

To address potential concerns in respect of Habitat Regulation compliance (and therefore to secure planning permission) developers should fully consider options to promote and secure uptake of high levels of use of electric vehicles by residents of new dwellings being built.

New or significantly altered petrol filling stations/other facilities directly providing for the travelling public and their vehicle movements will include provision of at least 2 fast EV chargers. Charging infrastructure must also be accessible to drivers with disabilities, including those using a wheelchair or walking frame.

Commented [A302]: Changes to policy seek to set an agenda for EV charging, drawing on renewable energy generation, at levels that exceed standards set out in Building Regulations. Such provision is specifically set out as a means to seek to address concerns generated from Habitat Regulation assessment and adverse impacts of fossil fuel (internal combustion engine) vehicles on the Pebblebed Heaths. A key part of the suggested approach to delivering mitigation will be an accelerated push to seek to secure more electric vehicles and less reliance on fossil fuels. If residents of new development are encourage to drive electric vehicles they will nit have the adverse impacts on the heaths and as such there will be a lower net level of impacts to secure any mitigation against.

The first part of TR04 (Residential car parking standards) applies to the Local Plan area excluding Cranbrook; the second part (Employment and other development parking standards) applies to the whole Local Plan area including Cranbrook.

Justification for policy

11.17. The ~~National Planning Policy Framework (NPPF)~~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%[97].

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[98]. ~~East Devon District Council (~~EDDC~~)~~ supports this transition through ~~electric vehicle~~EV infrastructure and smarter choices.

11.20. For residential parking, the parking figures are based on guidance from the Ministry of Housing, Communities and Local Government (MHCLG) ~~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

[97] CCF-014 - 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]

[98] 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]

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 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~~[99] and relevant government guidance, including the Devon Electric Vehicle Charging Strategy[100]. In plan policy, however, we go further than building regulations by encouraging developments that exceed such standards, specifically in recognition of air quality concerns at the Pebblebed Heaths SPA/SAC and the need to deliver mitigation. Greater access to and use of EVs , and therefore a decreasing use and reliance on fossil fuel vehicles, is identified as potentially critical in the longer term to ensure development can be successfully implemented without emissions adversely affecting the designated sites and therefore proposals failing to meet tests under the Habitat Regulations. To ensure that new development schemes can comply with assessment under the Habitat Regulations developers should give detailed consideration to potential options to meet and exceed local plan policy standards and to actively promote EV use. To ensure compliance with Habitat Regulation and deliver mitigation prospective developers should consider additional incentives that can be put in place that will lead to a significant shift away from fossil fuel vehicles by occupants of new housing and buildings towards and toward EV use. Whilst definitions of charging speeds are liable to change over time, at the time of plan drafting fast charging may be seen as 7–22 kW, rapid 45-65 kW, and ultra-rapid 95- 150 kW – the Devon Electric Vehicle Charging Strategy references these categories.

Commented [A303]: Text deleted as 2010 standards have been superseded and by just referring to Building Regulations establishes that it will be the current/most up to date version that is used/applied.

Commented [A304]: Text added to specifically refer to Habitat Regulations and the Pebblebed Heaths in respect of importance of electric vehicles and charging.

[99] ~~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~~

[100] TRI-003 - Devon Electric Vehicle Charging Strategy: https://eastdevon.gov.uk/media/tcyobx4i/tri-002-devon-electric-vehicle-charging-strategy.pdf

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~~ Exeter Airport or any safeguarding requirements of 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 across the whole plan area including the Cranbrook Plan area.

Commented [A305]: For clarity.

Commented [A306]: To reflect consultation response on behalf of Exeter Airport.

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.

11.28. According to Ofcom, in 2024 92.53%[101] of the addresses in East Devon have super-fast broadband coverage and 66.05%[102] have ultra-fast broadband coverage, in comparison the mean for all English district local authorities are 96.61% and 73.24%. This policy

[101] 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
[102] 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

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~~EDDC will continue to support the expansion of full-fibre broadband connections in the district.

This policy applies across the whole plan area including 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.

11.30. The Building etc. (Amendment) (England) (No. 2) Regulations 2022[103] 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~~EDDC would support further digital connectivity and high-quality communications improvements in the district by liaising with delivery partners

[103] TRI-012 - The building etc. (Amendment) (England) Regulations 2022: https://www.legislation.gov.uk/uksi/2022/603/contents/made [accessed 13th Jan 2025]

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~~NLs 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.

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 across the whole plan area including the Cranbrook Plan area.

Justification for policy

11.33. The ~~National Planning Policy Framework (NPPF)~~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)[104] and the National Infrastructure Strategy[105] 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)[106] 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~~NLs or sensitive locations require a Landscape and Visual Impact Assessment and, if near heritage assets, a Heritage Impact Assessment.

[104] TRI-013 – Future Telecoms Infrastructure Review, https://eastdevon.gov.uk/media/pqwjpgx5/tri-011-future-telecoms-infrastructure-review.pdf

[105] TRI-014 - National Infrastructure Strategy, https://eastdevon.gov.uk/media/ttifukxq/tri-012-national-infrastructure-strategy.pdf

[106] 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

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.

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 (including rivers, watercourses and waterbodies) 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

Commented [A307]: EA requested addition to ensure water related features are covered by the policy

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 and water forms 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 across the whole plan area including 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 d~~D~~istrict Landscape Characterisation Assessment

(LCA)[107] and the Council's Tree Strategy[108] to maintain and enhance local distinctiveness and landscape character.

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[109] 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.

[107] 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

[108] ENV-008 – Tree, Hedge & Woodland Strategy for East Devon 2024-2034, https://eastdevon.gov.uk/media/x4tixcar/env-008-tree-hedge-and-woodland-stratrgy-2024-2034.pdf ~~https://eastdevon.gov.uk/media/41ef4fiw/eddc_treewoodlandhedgerowstrategy_v1-4.pdf~~

[109] ENV-032 - Guidelines for Landscape and Visual Impact Assessment 3rd Edition, 2013 (Landscape Institute & IEMA), https://www.landscapeinstitute.org/technical/glvia3-panel/ [accessed 27th Jan 2025]

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.

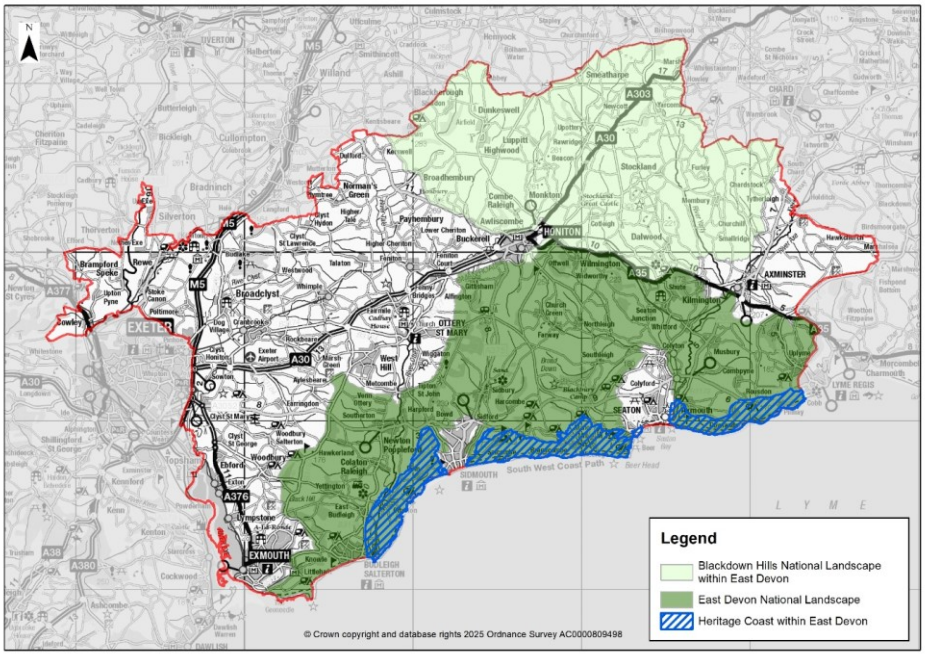


FIGURE 14 East Devon has significant National Landscapes (formerly AONB~~'~~s) and Heritage Coast.

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 across the whole plan area including the Cranbrook Plan area.

Commented [A308]: Punctuation error

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 (CROW) Act 2000~~ (CROW Act)~~[110], the Levelling Up and Regeneration Act 2023[111], and the ~~National Planning Policy Framework (NPPF)~~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.

[110] ENV-015 – Countryside Right of Way (CROW) Act 2000, https://www.legislation.gov.uk/ukpga/2000/37/contents [accessed 15th Jan 2025]
[111] ENV-016 – Levelling Up and Regeneration Act (LURA) 2023, https://www.legislation.gov.uk/ukpga/2023/55/contents [accessed 15th Jan 2025]

12.9. Heritage Coasts (as distinct from CPAs~~Coastal Preservation Areas~~ or the Dorset and East Devon / Jurassic Coast WHS) 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.

Coastal Preservation Areas

12.10. This policy designates land around the coast and estuaries of East Devon as a CPA~~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 CPA ~~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 CPA ~~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 applies across the whole plan area including the Cranbrook Plan area.

Justification for policy

12.11. The ~~National Planning Policy Framework (NPPF)~~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~~ WHS and its setting, and designates a CPA ~~Coastal Preservation Area~~ based on a detailed character assessment of visual openness and views to and from the sea.

Commented [A309]: Additional text requested by the Jurassic Coast WHS (Hosted by Dorset Council)

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.

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 across the whole plan area including 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 and ensures that views relating to heritage assets are protected for their contribution to the asset's significance. Site-based assessments should follow the latest guidelines for ~~Landscape and Visual Impact Assessment (~~LVIA~~)~~ [112] and be proportionate to the scheme's size and impact. If an LVIA is not required, a simple landscape assessment may suffice.

Commented [A310]: Additional text requested by Historic England to add clarity

12.14. Sources of information for assessments include the East Devon and Blackdown Hills Landscape Character Assessment (2019)[113], What Makes a View (Blackdown Hills AONB, 2013)[114], the Devon historic environment record[115], 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

12.15. 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.

Commented [A311]: Punctuation error

This policy applies across the whole plan area including the Cranbrook Plan area.

[112] ENV-032 - Guidelines for Landscape and Visual Impact Assessment 3rd Edition, 2013 (Landscape Institute & IEMA), https://www.landscapeinstitute.org/technical/glvia3-panel/ [accessed 10th Feb 2025]
[113] 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
[114] ENV-003 - What makes a view? https://eastdevon.gov.uk/media/5gdpc1hk/env-005-what-makes-a-view.pdf
[115] ENV-017 - Devon Historic Environment Record, https://www.devon.gov.uk/historicenvironment/the-devon-historic-environment-record/ [accessed 14th Jan 2025]

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. Additional benefits of Green Wedges can include protecting and enhancing ecological value, improving flood storage capacity and providing a green lung into urban areas. 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

Commented [A312]: Additional text from the Reg 18 draft as requested by the Environment Agency to demonstrate the multiple benefits of Green Wedges in tackling climate change and flooding.

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.

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, or enhance the use of LLAI/LGS will be supported.

This policy applies across the whole plan area including 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 designated 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 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, permitted or former waste management 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 in consultation with Devon County Council as the waste planning authority and in accordance with Policy W10 (Protection of Waste Management Capacity) of the Devon Waste Plan.

This policy applies across the whole plan area including the Cranbrook Plan area.

Commented [A313]: Changes to text provide greater clarity and emphasise importance of the County Council as the waste planning authority.

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.[116]

[116] ENV-018 – Environmental Protection Act 1990, https://www.legislation.gov.uk/ukpga/1990/43/contents [accessed 14th Jan 2025]

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 of~~f~~ the development or to surrounding areas.

This policy applies across the whole plan area including 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,;

G. Odour.

Where there is an identified risk of pollution, applications for new development should be accompanied by a ~~construction~~ Construction ~~environment~~ Environment ~~management~~ Management ~~plan~~ 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.

Development that is likely to have a significant effect on a European Wildlife Site with respect to air quality, will not be permitted unless Appropriate Assessment under the Habitat Regulations has ascertained that adverse impacts identified can be addressed through mitigation with clarity provided over delivery of that mitigation thus leaving ~~is~~ no adverse effect on the integrity of the site.

This policy applies across the whole plan area including the Cranbrook Plan area.

Commented [A314]: EA requested clarification as to when the cEMP would be required

Commented [A315]: Text added in response to matters raised in Pebblebeds air quality assessment work.

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 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.

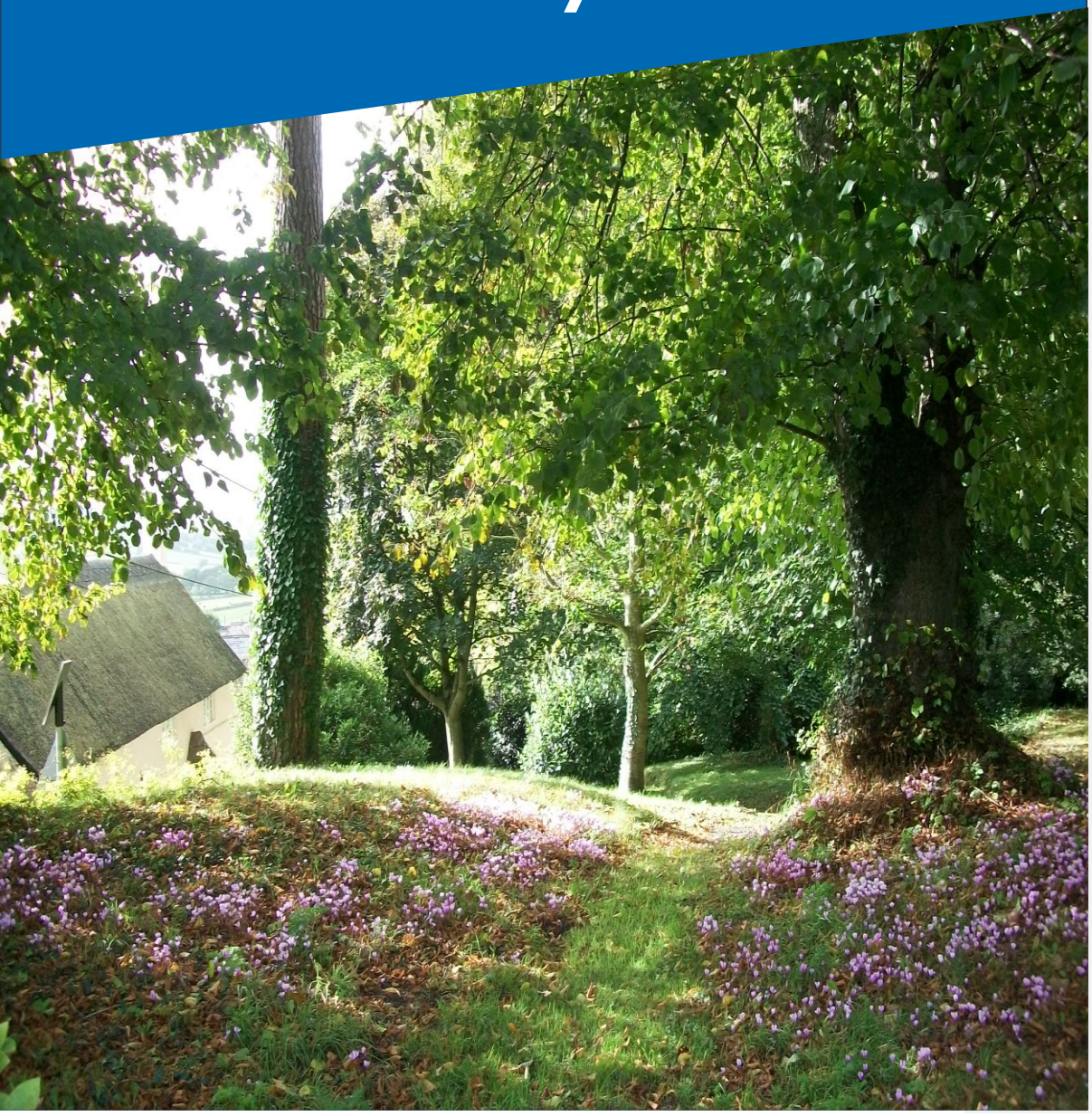
This policy applies across the whole plan area including the Cranbrook Plan area.

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.

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[117] and the Government's 25 Year Environment Plan[118].

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,

[117] ENV-013 – Environment Act 2021, https://www.legislation.gov.uk/ukpga/2021/30/contents [accessed 9th Jan 2025]
[118] 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.

~~Stategic~~Strategic Policy PB01: Protection of internationally and nationally important wildlife sites

International followed by 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

Very demanding tests apply to the consideration of any development proposals that alone or in combination with other plans or proposals could adversely impact on any internationally designated site whether inside or outside of East Devon.

Screening assessment under the Habitat Regulations, followed where necessary by appropriate assessment, will be undertaken for any development proposals that could cause a direct or indirect adverse effect upon internationally designated sites. Where assessment fails to rule out effects on integrity the development proposal will not be permitted unless mitigation measures are established that can be shown to be effective with clarity provided in respect of means and assurance of implementation. Where avoidance of adverse impacts cannot be achieved, and where otherwise acceptable under local plan policy, proposals will only proceed if there is no alternative and there

Commented [A316]: This policy has been redrafted to draw a clear distinction between international designated sites and national designated sites. The former are subject to Habitat Regulations (the latter not) and in redrafting this point is explicitly made clear. Deletions to policy text are made as there was confusion in seeking to have clauses that were applicable to both international and national sites when differing considerations apply to each. However, more general referencing in policy, new text, is seen as beneficial to plan users. Added text under the heading of 'Nationally Designated Sites' largely reinstates, but for nationally designated sites only, text that is deleted at the start of the policy.

are imperative reasons of over-riding public interest, in accordance with the Habitats Regulations.

Internationally designated sites falling under this aspect of policy include:

- Special Areas of Conservation (SAC);
- Special Protection Areas (SPA);
- Proposed SACs;
- Potential SPAs;
- Ramsar sites;
- Proposed Ramsar sites.
- Areas secured as compensation for damage to an internationally or nationally designated site

Nationally designated sites

Development proposals that would cause a direct or indirect adverse effect upon nationally designated sites will not be permitted unless both of the following are met:

A. The development cannot be located on an alternative, local plan policy compliant site, that would cause less or no harm; and

B. The public benefits of the proposal clearly outweigh the impacts on the features of the site and any linked wider network of natural habitats and designated sites.

Where permanent, long-term or temporary habitat loss or direct reduction of habitat condition may occur through development, bespoke compensation measures (if these are in other respects legally compliant) will need to be secured in accordance with the mitigation hierarchy. Consideration of compensation measures must be undertaken as early as possible in developing proposals and include utilisation of the Discretionary Advice Service from Natural England.

Nationally designated sites falling under this aspect of policy include:

- Sites of Special Scientific Interest (SSSI);
- Marine Conservation Zones (MCZ);

- National Nature Reserves (NNR).

~~In HRA terms where mitigation enables a conclusion of no adverse effect on integrity (point C) there is no need to go down the derogation route (points A and B).~~

This policy applies across the whole plan area including the Cranbrook Plan area.

Justification for policy

13.8. ~~13.7~~ 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. Local Plan policy PB04 provides more detail on site specific considerations and strategic approaches falling under the Habitat Regulations.

For international sites the proponent of the plan or proposal must provide all necessary information to allow the planning authority to carry out HRA of the proposal.

Where there are likely significant effects to an international 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.

Commented [A317]: New text provides some additional context and information to inform on application of plan policy.

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 experienced botanist (Field Identification Skills Certificate[119] level 4 (or equivalent) or above) in accordance with published (or updated) designation criteria[120] 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 (in line with the most recent DEFRA biodiversity metric) and ensuring that there is no degradation to the wider ecological networks and priority habitats.

Such sites include:

- Local n~~N~~ature r~~R~~eserves ~~(LNR)~~;
- County Wildlife Sites (CWSs);
- Unconfirmed Wildlife Sites (UWSs);
- Special Verges designated for biodiversity.

Commented [A318]: Policy reference to metric deemed to be helpful.

[119] ENV-019 - Field Identification Skills Certificate, https://bsbi.org/field-skills [accessed 7th Jan 2025]

[120] 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]

- Habitats of Principal Importance, as listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (identified through site survey work or as identified through existing mapped resources)

This policy applies across the whole plan area including the Cranbrook Plan area.

Commented [A319]: Change recommended by Natural England as these habitats are identified as particularly important.

Justification for policy

~~13.8.~~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~~CWSs are determined by the Devon Wildlife Trust following rigorous assessment criteria. ~~Unconfirmed County Wildlife Sites~~UCWSs have been subject to initial review but not fully assessed to justify designation.

Irreplaceable habitats and important features

~~13.9.~~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:

Ancient 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

Important hedgerows as defined by the Hedgerow Regulations 1997[121], 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.

Commented [A320]: Redundant word

Hedgerow translocation should always be considered first, as a preferential option to hedgerow destruction followed by compensation.

[121] ENV-020 – The Hedgerows Regulations 1997, https://eastdevon.gov.uk/media/zolnismd/env-020-the-hedgerows-regulations-1997.pdf

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[122] 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.

And additional habitats to include:

-intertidal mudflats

-rivers and streams

-estuarine habitats

-coastal and floodplain grazing marsh

-broadleaf mixed and yew woodland

-traditional orchards

-lowland heathland

-maritime slopes and cliffs

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.

Commented [A321]: It was seen as desirable to identify additional habitat types.

[122] 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)

EcIAs should be informed by recent survey information undertaken at suitable time of year following best practice guidelines and BS 42020:2013[123] (or superseding standard)

This policy applies across the whole plan area including the Cranbrook Plan area.

Justification for policy

~~13.10.~~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.

~~13.11.~~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

~~13.12.~~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 sets out details of the approach to be taken. The following plan policy sets out details on strategic mitigation strategies that can support development proposals through Habitat Regulation assessment.

[123] 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]

Strategic Policy PB04: Habitat~~s~~ Regulations Assessment (HRA) and mitigation strategies

Undertaking HRA ~~avoidance~~ and mitigation strategies and guidance

~~Subject to exceptional circumstances referred to in policy PB01, proposed~~ Development proposals, plans or projects must not adversely affect the integrity of sites protected under the Conservation of Habitats and Species Regulations 2017[124] (as listed in Policy PB01 or which may be designated in the future). ~~These sites consist of:~~

~~Special Areas of Conservation (SAC);~~

~~Special Protection Areas (SPA);~~

~~Proposed SACs;~~

~~Potential SPAs;~~

~~Ramsar sites;~~

~~Areas secured as sites compensating for damage to a European site.~~

In cases where development could result in adverse effects on the integrity of any of these sites the ~~The~~ proponent of ~~the plan or proposal~~ any proposed development 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~~

[124] ~~ENV-021 – The Conservation of Habitats Species Regulations 2017, https://www.legislation.gov.uk/uksi/2017/1012/contents [accessed 14th Jan 2025]~~

Commented [A322]: This policy has been redrafted to avoid aspects of duplication of Policy PB1 and to clearly focus it on specific concerns at designated sites and the role and relevance of mitigation strategies that we have in place or are proposing to produce. In policy redrafting we have sought to make it clear that prospective developers can draw on the strategies to inform their submission and application of strategies should ease the planning process. However, this is not a (legal) requirement and applicants can do evaluation and propose mitigation outside of the strategies.. Policy redrafting has also sought to reduce the length of policy by removing elements that are concerned more with process rather than matters relevant to determination of planning applications. Some parts of policy text are moved around, hence some deletions and replacement elsewhere in the policy. In policy changes extra text, in particular, is added in respect of air quality matters and adverse impacts from fumes of internal combustion engine vehicles on the Pebblebed Heaths. We have technical assessment work that highlights that a problem exists and an initial assessment of potential mitigation options. The intent is that mitigation approaches will be more fully developed ahead of submission of the plan for examination and will set out how mitigation will be delivered. Given the nature of the identified concerns a break clause has been written into plan policy that will require monitoring work to assess ongoing impacts and changes in order to demine acceptability of development schemes coming forward.

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 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. To support the planning application process proposals should take into consideration and developers may choose to progress in accordance with the latest versions of 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 and as may be superseded and updated):

- South-East Devon Wildlife - European Joint Habitats Sites Mitigation Strategy (existing— and undergoing review);
- Beer Quarry Caves SAC Guidance Document (existing);
- Exmouth Imperial Recreation Ground Events Protocol (existing);
- River Axe SAC Mitigation Strategy (proposed);
- Pebblebed Heaths - Vehicle emissions impacting on the designated site (proposed). air quality mitigation strategy (interim draft completed full strategy in production).

Specific HRA policy requirements in relation to avoiding, mitigating and compensating for HRA impacts

Details of mitigation strategies as well as specific policy considerations applicable to sites are set out below.

The South-East Devon ~~European Sites~~ Wildlife – Joint Habitats Sites Mitigation Strategy (2024) ~~(SEDESMS)~~[125]

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 with ~~-~~and a new strategy agreed in 2025 ~~is nearing completion at early 2025~~.

All residential development schemes within a straight line 10 ~~kilometers~~ kilometres 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 metr~~ee~~rs of the Pebblebed Heaths.

[125] ENV-009(rev) - South-east Devon European Site Mitigation Strategy 20~~1~~24 - https://eastdevon.gov.uk/media/iixb3qln/env-009a-rev-se-devon-mitigation-strategy-final-2025.pdf ~~https://eastdevon.gov.uk/media/369997/exe-overarching-report-9th-june-2014.pdf~~

Nutrient neutrality in the River Axe SAC catchment

~~East Devon District Council~~EDDC 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.

Protection of Beer Quarry Cave SAC bat pinch points between Seaton and Colyford, and between Colyford and Colyton[126]

In order to protect ~~the~~ bat pinch points (semi-natural habitats between Seaton, Colyford, and Colyton) 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 emissions impacting on designated sites

Development will not be permitted where there is potential for increased vehicle numbers, applying a precautionary approach, resulting in unacceptable increases of emissions of nitrogen oxides (NOx) and/or ammonia (NH3) or other polluting emissions falling on designated sites. Emissions coming~~,~~ from internal combustion engine vehicles are a specific concern where they exceed~~ing~~ threshold levels of harm to designated sites falling under this policy (specifically at the Pebblebed Heaths). For the Pebblebed Heaths assessment work shows that development across large parts of East Devon will lead to extra traffic on roads crossing the heaths with increased emissions from internal combustion engine vehicles. Modelling in support of the local plan demonstrates that (in the absence of mitigation) nitrogen oxides (NOx) and

[126] ENV-005 - Beer Quarry and Caves ~~(~~SAC~~)~~ Habitats Regulations Assessment (HRA) Guidance - https://eastdevon.gov.uk/planning/beer-quarry-and-caves-sac-guidance/

ammonia (NH3), from internal combustion engine vehicles will lead to pollutant levels exceeding threshold levels of harm.

In respect of the Pebblebed Heaths a specific policy break clause applies. Under this break clause any proposal that results in a net increase in emissions from traffic (along the relevant roads), will only be permitted where there is sufficient headroom and there will be no deterioration in site quality as a result of the proposal. Monitoring will be undertaken to determine and assess site quality and application of the break clause. Under the break clause, if emissions occur and at a level that causes harm, the granting of planning permission for new development will depend upon the monitoring and associated assessment demonstrating that there is and has been no deterioration in site quality to any site part/s that development will generate future vehicle flows over.

Pebblebed Heaths air quality mitigation strategy

The Council is working on production of the 'Pebblebed Heaths air quality mitigation strategy'. This strategy will identify a suite of costed mitigation measures, specifically including promoting accelerated uptake of electric vehicles, that will ensure delivery of mitigation and therefore allow for individual planning application compliance under the Habitat Regulations.

In application of this strategy the policy break clause, with associated phasing considerations, will be applied in the use of plan policy. The break clause will manage and control planning permissions being granted and any associated conditions attached, or permissions being refused, on account of failings in respect of assessment under the Habitat Regulations and specifically mitigation delivery.

Developer use or not of mitigation strategies

Applicants may draw on the strategies listed in this policy and choose to fall under their requirements in terms of seeking planning permission or they have the choice to undertake their own assessment work and if appropriate identifying mitigation measures. If not falling under these strategies the planning authority, in respect of

undertaking assessment under the Habitat Regulation, will nonetheless consider any such work submitted in the context of the strategies.

To be granted planning permission development proposals must clearly demonstrate that mitigation can and will be provided to ensure no adverse effect on the integrity of any European site. There is a need to identify and secure mechanisms through which delivery will be achieved, secured in perpetuity, and delivered within agreed timescales.

This policy applies across the whole plan area including the Cranbrook Plan area.

Justification for policy

Commented [A323]: Minor changes are made to 'Justification for policy' text to correct some referencing errors and provide clarify over policy intent.

~~13.13.~~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/Ramsar and East Devon Pebblebed Heaths SAC/East Devon Heaths SPA.

~~13.14.~~13.15. All plans and projects not directly connected with the conservation management of a ~~habitats~~ European site require an HRA ~~Screening~~ screening to ~~assess potential~~ identify any likely significant effects. If significant effects cannot be excluded, an ~~Appropriate Assessment~~ 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 no alternatives and imperative reasons of overriding public interest. In such cases ~~with adequate~~ compensation is required.

~~13.15.~~13.16. The South-East Devon ~~European~~ Wildlife – Joint Habitats Sites Mitigation Strategy (2024) ~~(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 S~~uitable Alternative Natural Green Space (~~SANG~~S)~~. ~~SANGS~~ SANGs provided as part of major developments must provide 8 hectares of open space per 1,000 new residents and be appealing to dog walkers.

Commented [A324]: To make it clear that this is a specific developer contribution requirement for SANGs.

~~13.16.~~13.17. To preserve the East Devon Pebblebeds Heath, new residential uses and tourist accommodation or other developments that may result in unacceptable impacts within 400 metres of the SPA are prohibited. Mitigation must be provided in perpetuity, with developer-led ~~SANGS~~ SANGs implemented before development occupancy. The council may use Compulsory Purchase Order powers to ensure land availability for ~~SANGS~~SANGs. Monitoring will ensure mitigation keeps pace with development to protect the integrity of European sites.

Commented [A325]: Text change clarifies that not only residential development is a relevant concern,



FIGURE 16 Low tide on the Exe Estuary/the sea

~~13.17.~~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.

~~13.18.~~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[127] provides specific requirements for developments in these zones.

13.20. Vehicle Emissions Impacting Designated Sites: ~~Atmospheric~~ nitrogen deposition ~~affects the~~ has been demonstrated to adversely affect the East Devon Pebblebed Heaths, leading to vegetation changes and adverse impacts on fauna. Development increasing traffic and emissions that result in adverse impacts on the heaths will not be permitted without mitigation[128]. Broader Monitoring and responding actions will ensure other designated sites, including the River Axe, are protected from similar impacts.

The Pebblebed Heaths Air Quality Mitigation Strategy

For the Pebblebed Heaths a technical assessment report[129] of vehicle impacts has been undertaken and this shows that development occurring through local plan policy, taken as a whole, will result in unacceptable adverse impacts in the absence of mitigation. The scale of adverse impacts are a product of levels of development and predicted vehicle flows (this is informed by development site location) travelling on roads over the heaths.

An initial overarching mitigation strategy has been produced[130] and this is to be followed by a more detailed Pebblebed Heaths Air Quality Mitigation Strategy. The detailed mitigation strategy will establish a strategic approach to ensuring mitigation delivery. This strategy will include costed projects and schemes that can be demonstrated to be deliverable. Such projects will ensure that the local plan can be implemented and that individual planning applications can

Commented [A326]: Further to commentary about changes to plan policy additional text is included in respect of the Pebblebed Heaths air quality issues and mitigation to inform plan users of the strategy work and mitigation approaches.

[127] 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

[128] 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

[129] ~~Add air quality technical report here.~~ ENV-033 – Mitigation of Air Quality Impacts – East Devon Heaths – Technical Report: https://eastdevon.gov.uk/media/e55jxcbm/env-033-mitigation-of-air-quality-impacts-east-devon-pebblebed-heaths-technical-report.pdf

[130] ~~Add air quality mitigation report here~~ ENV-034 – Mitigation Strategy for Air Quality Impacts - https://eastdevon.gov.uk/media/03gnxxrb/env-034-mitigation-strategy-for-impacts-of-air-quality-east-devon-pebblebed-heaths.pdf

meet Habitat Regulation requirements and proceed on the basis of drawing on planned mitigation and capacity and timing for delivery as set out in this strategy.

A 'long-list' of potential mitigation options from initial work will be refined and costed and where appropriate included in the detailed strategy, to potentially include:

- Traffic re-direction away from the Pebblebed Heaths and sensitive locations
- Speed reduction
- Low Emission Zones and Ultra Low Emission Zones
- Provisions of alternative recreational sites
- Advertisement of additional recreational sites
- Inclusion of air pollution specific planning conditions in the planning process
- Promotion of green vehicles
- Providing additional road signage
- Temporary site closures
- Covering slurry tanks
- Increased land management at the designated sites
- Air quality barriers/screens

Monies, drawn from developer contributions, will secure mitigation delivery.

A key element of mitigation will be proactively seeking an accelerated rate of uptake of electric vehicles, specifically amongst those moving into new homes to be built under local plan policy. Electric vehicles do not generate emissions and as such greater levels of use with a corresponding decrease in internal combustion engine vehicles will diminish over time the need for other mitigation.

Under the strategy increased electric vehicle uptake will therefore sit alongside other mitigation measures to establish time based quantified levels of development that can be implemented in a manner that will be compliant with mitigation needed under Habitat Regulation assessment requirements.

In plan policy and as will be referenced in the strategy a break clause establishes limitations on development being acceptable in the absence of identified and staged mitigation measures being planned and delivered. The break clauses will therefore be a mechanism to ensure that

mitigation will be delivered and to establish when, under the strategy, it would be appropriate for planning applications to be granted and also, and critically, to be deemed not acceptable and refused. Under the overarching strategy the granting of planning permission and potential conditions or agreements on phasing of development will be tied to their being clear confidence of mitigation delivery and that it will achieve defined outcomes and objectives.

A programme of monitoring and review will be established to assess the impacts and effectiveness of the strategy. Strategy review in response to monitoring conclusions and new evidence and technical assessment will be undertaken on a proposed five yearly basis (from the date of plan adoption) to inform refinement or adjustment of mitigation measures.

Biodiversity Net Gain (BNG)

~~13.19.~~13.21. Biodiversity N~~n~~et G~~g~~ain (BNG) 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~~BNG and in East Devon we recognise the importance and are seeking to exceed minimum national levels.

Strategic Policy PB05: Biodiversity Net Gain (BNG)

Major development[131] 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.

Commented [A327]: Footnote definition of major is deleted as it appears in the glossary of terms.

[131] ~~NPPF: https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf (definition in Annex 2 – for housing 10 more homes/0.5 hectares or more for other uses - additional floorspace of 1,000 SqM or more)~~

All applications subject to ~~biodiversity net gain~~BNG will need to be supported by a Biodiversity Gain Statement which clearly demonstrates how the biodiversity gain hierarchy has been followed noting that ~~:~~impacts on biodiversity should be avoided, if this is not possible then impacts should be mitigated and finally if there is no alternative, fully compensated. 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[132], BS 8683:2021133[104], 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~~CVRP, 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.

Commented [A328]: Change provides greater clarity in respect of mitigation.

[132] 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

[104] 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 14 January 2025]

Developments exempt from mandatory BNG are required to deliver ecological enhancements ~~consummate~~ commensurate 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

~~13.20.~~13.22. The Environment Act 2021[134] 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.

~~13.21.~~13.23. The Lawton Report (2010)[135] 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.

~~13.22.~~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)[136] ~~commits to~~

[134] ENV-013 – Environment Act 2021, https://www.legislation.gov.uk/ukpga/2021/30/contents [accessed 14 January 2025]

[135] 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

[136] 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~~ https://eastdevon.gov.uk/media/xbqn4uxb/env-025-nature-recovery-declaration-for-east-devon.pdf

~~exceeding the 10% BNG target, recognising the link between biodiversity and climate crises~~ sets out more detail on the Council approach.

~~13.23.~~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. 20% BNG aligns with wider positive biodiversity objectives that are relevant for a district with significant nature conservation assets, substantial environmental designations but which also needs to accommodate high development pressures.

~~13.24.~~13.26. Future Habitat bank ~~proposals~~ in East Devon ~~indicate~~ could offer 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.

~~13.25.~~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.

Local Nature Recovery Strategy (LNRS) and Nature Recovery Network (NRN)

~~13.26.~~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 (LNRS) and Nature Recovery Network (NRN)

Proposals which result in enhancement of existing and any subsequentially defined NRNs and features that contribute to their importance, through habitat creation

Commented [A329]: A respondent rightly pointed out that the linked document (noting also a web link error) does not provide any evidence for 20% net gain. Text is amended.

Commented [A330]: We will need to add evidence in respect of this point. Or remove text.

Commented [A331]: New text provides supporting text for seeking justifying 20% BNG.

Commented [A332]: Text amended as having Habitat Banks is seen as an aspiration for the future, but they are lacking at the present time.

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~~ NRNs 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~~BNG, 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)~~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[137].

This policy applies across the whole plan area including the Cranbrook Plan area.

Justification for policy

~~13.27.~~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~~)~~[138]. ~~The intent, in the summer of 2025, is that the statutory LNRS mapping will be published.~~ Consultation on the draft –

[137] ENV-026 - How is Biodiversity Net Gain Measured? https://eastdevon.gov.uk/planning/biodiversity-net-gain/how-is-biodiversity-net-gain-measured/

[138] 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 15 January 2025]

Devon's Local Nature Recovery Strategy[139] closed on the 5 November 2025 - ~~https://www.devon.gov.uk/environment/wildlife/devons-local-nature-recovery-strategy.~~ This draft and in final adopted form this strategy will help inform the implementation of plan policy. ~~East Devon District Council~~EDDC 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.

Commented [A333]: Change made to highlight new work on the Nature Recovery Strategy.

~~13.28.~~13.30. The LNRS and NRN aim to implement the Lawton Report's principles of creating "bigger, better, and more joined-up"[140] ecological networks. This involves improving, expanding, and connecting habitats to enhance ecological resilience and focus nature recovery efforts.

~~13.29.~~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~~local nature reserves, ~~County Wildlife Sites~~CWSs, special verges, ancient woodlands, and habitats of principal importance under the NERC Act 2006.

[139] ENV-035 – Devon's Local Nature Recovery Strategy, https://www.devon.gov.uk/environment/wildlife/devons-local-nature-recovery-strategy [~~(~~accessed 14th Nov 2025]~~)~~

[140] 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

Current landscape scale projects (i.e. covering larger scale areas) promoting nature recovery include:

- The Three Rivers Landscape Recovery Project - at and around Killerton estate - a National Trust sponsored project that has received Department for Environment, Food and Rural Affairs funding.
- Luppit Landscape Partnership - a landowner-led collaborative initiative in Luppitt and Combe Raleigh parishes, within the Blackdown Hills National Landscape which has received Department for Environment, Food and Rural Affairs funding.
- The Heaths to Sea Landscape Recovery project – on and around the Clinton Devon (the project sponsor) estate in the south-east of East Devon. A bid for Department for Environment, Food and Rural Affairs funding will be submitted in 2026.

Commented [A334]: As these are significant projects that are directly relevant to plan policy it is seen as beneficial to reference them in the local plan text.

Design features for wildlife enhancement

~~13.30.~~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~~BNG, mitigation or compensation, all proposals (including new developments and changes of use) 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~~ or others of equivalent value are sought within new proposals:

Commented [A335]: New text gives greater clarification.

Commented [A336]: Responds to objections about being overly tightly defined - and: item C lacking clarity and item E overhanging eaves potentially not being architecturally desirable.

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[141];

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, responding to existing value and species presence and potential opportunities including in respect of priority for threatened species, 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 (to avoid removal by new owners).

This policy applies across the whole plan area including the Cranbrook Plan area.

Commented [A337]: Gives some more policy flexibility, responding to objections.

Justification for policy

~~13.31.~~13.34. Significant development growth in East Devon will increase pressure on the natural environment but also offers opportunities for nature

[141] 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 15 January 2025]

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.

~~13.32.~~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.

Commented [A338]: Text removed as specific para reference is now out of date.

~~13.33.~~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.

~~13.34.~~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.

~~13.35.~~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.

~~13.36.~~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

~~13.37.~~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

Commented [A339]: Minor grammatical corrections are made in this policy.

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[142]) 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 this on the development site or on publicly accessible land in accordance with the minimum compensation requirements for trees listed in the

[142] 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 14 January 2025]

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 over 75mm diameter at 1.5m height 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~~BNG. 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 be required to provide appropriate depth of foundations considering local soil geology and water demand of nearby trees (and those proposed as part of an

Commented [A340]: Text deleted as we cannot control permitted development.

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) Number of replacement trees[143] 7 – 19.9120 – 29.9230 – 39.9340 – 49.9450 – 59.9560 – 69.9670+7**~~

Commented [A341]: Conversion of text to table

Trunk diameter of tree lost to development (cm measured at 1.5 m)	Number of replacement trees[113]
7 - 19.9	1
20 - 29.9	2
30 - 39.9	3

113 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

~~[143] 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~~

40 - 49.9	4
50 - 59.9	5
60 - 69.9	6
70+	7

Provision 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 across the whole plan area including the Cranbrook Plan area.

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 as follows. ~~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:~~

Commented [A342]: Removes financial bond element as this is not reasonable.

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 across the whole plan area including the Cranbrook Plan area.

Justification for policy

~~13.38.~~13.41. Trees, woodlands, and hedges are crucial ~~green infrastructure~~GI 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.

~~13.39.~~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.

~~13.40.~~13.43. This policy supports the Tree, Hedge, and Woodland Strategy for East Devon[144], promoting the creation of new green spaces that benefit wildlife and public health.

The Dorset and East Devon / Jurassic Coast World Heritage Site

~~13.41.~~13.44. Most of the East Devon coastline is part of the Jurassic Coast ~~World Heritage Site~~WHS, recognised for its exceptional geological importance.

Policy PB10: Protection and enhancement of the Dorset and East Devon / Jurassic Coast World Heritage Site

Development within the Dorset and East Devon / Jurassic Coast ~~World Heritage Site~~WHS, or that could adversely impact on its setting, will only be permitted if it can

Commented [A343]: Clarification

Commented [A344]: Clarification

[144] ENV-008 - EDDC Tree, Hedge and Woodland Strategy 2024-2034 ~~v1.4~~, https://eastdevon.gov.uk/media/x4tixcar/env-008-tree-hedge-and-woodland-stratrgy-2024-2034.pdf ~~https://eastdevon.gov.uk/media/maslyxjp/eddc_treewoodlandhedgerowstrategy_v2-7_lores.pdf~~ ~~https://eastdevon.gov.uk/media/b4dnabwy/env-008-tree-hedge-and-woodland-stratgy-v-1-4.pdf~~

be demonstrated that the Outstanding Universal Value (OUV) 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~~WHS;
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 others affording coastal and countryside protection and enhancement.

This policy does not apply in the Cranbrook Plan area.

Justification for policy

~~13.42.~~13.45. The Dorset and East Devon / Jurassic Coast, inscribed as a ~~World Heritage Site~~WHS by UNESCO in 2001, is globally significant for its geology, fossils, and landforms. It is England's only natural ~~World Heritage Site~~WHS, extending from Orcombe Point at Exmouth to Old Harry Rocks near Swanage, Dorset. This policy aligns with and supports the obligations and duties of the UK Government for the implementation of the UNESCO World Heritage Convention.

Commented [A345]: Clarification

Commented [A346]: Text requested by World Heritage site team, it emphasises the importance on the site.

~~13.43.~~13.46. The Jurassic Coast Partnership Plan (2020-2025)[145] identifies the site's ~~Outstanding Universal Value (~~OUV~~)~~, including its stratigraphy,

[145] ENV-030 – Jurassic Coast Partnership Plan 2020-2025, https://eastdevon.gov.uk/media/qtnjkerd/env-029-jurassic-coast-partnership-plan-2020-2025.pdf

palaeontological record, geomorphological features, and ongoing scientific importance. The high rate of erosion is a key characteristic, maintaining dynamic rock exposures.

~~13.44.~~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.

~~13.45.~~13.48. This policy aligns with the Jurassic Coast Partnership Plan, promoting geodiversity and public enjoyment of the site while safeguarding its geological heritage. Applicants and decision makers attention is drawn to the UNESCO's Guidance and Toolkit for Impact Assessments in a World Heritage Context this toolkit should be used in cases where impacts may arise.[146]

Commented [A347]: Text change is seen as useful as it highlights the guidance and toolkit.

Sites designated for their geological importance

~~13.46.~~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.

[146] ~~Need to add reference to local plan evidence library - HRD-009 - Guidance and Toolkit for Impact Assessment in a World Heritage Context, https://eastdevon.gov.uk/media/mjhduzbn/hrd-009-guidance-and-toolkit-for-impact-assessment-in-a-world-heritage-context.pdf~~

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

~~13.47.~~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 (RIGS)

~~13.48.~~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 (RIGS)

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~~ RIGS 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 across the whole plan area including the Cranbrook Plan area.

Justification for policy

~~13.49.~~13.52. RIGS are important for their geological significance in Devon. Established by the Devon ~~Regionally Important Geological and Geomorphological Sites~~RIGS Group, these sites are valuable educational, historical, and recreational resources. The selection criteria include educational use, scientific study, historical importance, and aesthetic value.

~~13.50.~~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.

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~~ by those proposing development 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 across the whole plan area including the Cranbrook Plan area.

Commented [A348]: To provide clarity over role of developers.

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)[147] 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, bowls, netball and tennis and will provide evidence to inform decision making.

Commented [A349]: To give greater clarity to the role of the Playing Pitch Strategy and the sports that it will address.

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. . Open space provision should create safe spaces, for women, girls and all users aligning with designing out crime principles. Parks and recreations should be designed with the following in mind:

- Eyes on the Park – a constant mix of activity and natural proprietors watching over the area. Facilities that attract a broad demographic with good lines of site, surveillance opportunities and effective management and maintenance.
- Awareness – enhancing the ability to see and be seen, ensuring clear wayfinding and easy navigation of the site, including a clear hierarchy of paths with wide and visible entrances. Facilities located close to main routes and busy areas of the park.
- Inclusion – access via safe, well used routes and designing facilities with inclusion of all demographics in mind. Entrances close to public transport links prioritised with signposting to nearby facilities, safe zones etc. Engagement with local community and relevant groups to inform design.

Commented [A350]: Text suggested by Devon and Cornwall Police in particular to afford protection to women and girls. New wording is considered to highlight a matter of specific concern.

[147] 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

FIGURE 17 Playing pitch at Ottery St Mary



Quantified open space standards applicable for new development

~~14.3.~~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[148].

[148] HCO-003 - Fields in Trust Guidance for Outdoor Sport and Play, https://fieldsintrust.org/content/images/FIT-Standards-2024-Accessible-version.pdf

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~~ GI 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~~ tabled below:

~~Below.~~

- Up to 20 homes should provide on-site ~~amenity green space suitable for~~ informal play provision - item (C) in the table.
- On sites of Between 21 and 100 homes should provide on-site Local Areas of Play (LAPs) – under item (B) in the table - and ~~amenity green space~~ informal play provision - item (C) in the table. On smaller sites, in particular, ~~amenity greenspace and designated play areas~~ space provision 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.~~
- On sites of Between ~~300~~ 101 and 500 homes should provide on-site ~~Local Areas of Play (~~LAPs~~),~~ and ~~Local Equipped Areas of Play (~~LEAPs~~)~~ - under Item (B) in the table, and informal play provision - item (C) in the table ~~amenity green space and all other open space typologies as set out in the table below~~.
- On sites of more than ~~500~~ 501 homes should provide all types of play spaces (LAP, LEAP, Neighbourhood Equipped Area for Play (NEAP), and additional informal play provision (e.g. Multi-Use Games Area (MUGA), Pump Track))~~)~~ for all ages,

Commented [A351]: This policy has been redrafted to correct errors in respect of translating Field in Trust standards into plan policy

Commented [A352]: To provide greater policy clarity.

~~:~~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
Open space type (defined in Field in Trust standards)	**Quantity guideline (hectares per 1,000 population)**	**Maximum walking guideline distances from dwellings**
(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
(C) 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.

Accessible Greenspaces and parks and gardens and natural and semi natural green space required under policy, so long as meeting necessary standards for provision, can contribute towards other functions such as ~~Suitable Alternative Natural Greenspace (~~SANG~~)~~ or ~~Biodiversity Net Gain~~BNG. New developer provided open space will typically be required on site, unless impractical or 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 meet or exceed quantified needs in a locality 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.

Where site topography or other planning constraints prevent or severely limit scope for policy delivery on site alternative or better on or near site open space provision will be required. Exceptionally ~~Or~~ an agreed contribution for off-site open space delivery to a level that meets or exceeds policy standards may be accepted.

Open space requirements for non-residential use

Commented [A353]: Text clarifies the types of open space that can contribute to other functions and highlights off-site provision will be appropriate where providing on-site is impractical.

Commented [A354]: Change provides some greater flexibility, noting that some sites may not be suitable to accommodate the policy types, but also stressing this is in exceptional circumstances.

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 across the whole local plan area including the Cranbrook Plan area but in the case of the Cranbrook Plan area only to those areas that are NOT allocated for built development (within these areas Cranbrook Plan occupancy rates apply).

Commented [A355]: Change responds to matter raised in plan objection/provides clarity.

Justification for policy

~~14.4.~~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.

~~14.5.~~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

~~14.6.~~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 space

Commented [A356]: Missing word

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 across the whole plan area including the Cranbrook Plan area.

Justification for policy

~~14.7.~~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.

New allotments and avoiding the loss of existing ones

~~14.8.~~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 across the whole plan area including the Cranbrook Plan area.

~~14.9.~~14.10. Allotments are valuable community assets, especially in urban areas. The council supports new allotments based on local needs.

~~14.10.~~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

~~14.11.~~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, heritage 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.

Commented [A357]: Suggestion of Historic England recognising significance of heritage assets alongside those already listed.

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 across the whole plan area including the Cranbrook Plan area.

Justification for policy

~~14.12.~~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.

~~14.13.~~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.

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)[149] guides policy implementation, detailing the district's heritage and setting objectives for its preservation. This strategy includes broader designations like ~~National Landscapes~~NLs, 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.

[149] HRD-004 – East Devon Heritage Strategy (2024-2042), *new link*

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[150], Conservation Area Appraisal or review or through the planning application process, will be recognised as heritage assets in accordance with national guidance and~~HE01)~~ 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. Applications should also assess the impact of proposals on that significance. 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 across the whole plan area including the Cranbrook Plan area.

Commented [A358]: Text added to clarify that impacts of a proposal on assets should also be assessed.

[150] 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~~ National Heritage List and Conservation Area Appraisals to understand the significance of affected heritage assets. Proposals should align with the Heritage Strategy and relevant guidance.

Commented [A359]: Amendment requested Historic England to reflect good practice

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.

Commented [A360]: Deletion requested by Historic England as unecessary

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 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 that would outweigh any remaining harm ~~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 across the whole plan area including the Cranbrook Plan area.

Commented [A361]: Change made to add to precision and give greater clarity.

Justification for policy

15.12. East Devon has around 3,125 ~~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. The setting of a heritage asset is also protected insofar as it contributes to the significance of the asset. The NPPF defines a setting as the surroundings in which a heritage asset is experienced. Occasionally, land distant from the building may also be considered part of its setting due to particular visual, historical or functional associations.

Commented [A362]: Correction made as review of mapping systems show 3,125 listed buildings.

Commented [A363]: Additional text requested by Historic England for clarity.

Commented [A364]: Additional text requested by Historic England for clarity.

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;

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 across the whole plan area including 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.

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,~~ W~~w~~here 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 should be published and made available to the relevant local and county authorities as well as being made publicly accessible.

This policy applies across the whole plan area including the Cranbrook Plan area.

Commented [A365]: Historic England requested amendment for clarity

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[151] includes numerous other sites of local

[151] ENV-017 - Devon Historic Environment Record, https://www.devon.gov.uk/historicenvironment/the-devon-historic-environment-record [accessed 14 January 2025]

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 and ~~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.

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~~

Commented [A366]: Historic England suggested amendment for clarity

~~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 across the whole plan area including the Cranbrook Plan area.

Commented [A367]: Paragraph deleted as it replicates matters addressed in Strategic Policy HE01.

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~~GI 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.

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 extensions to existing facilities, to support (typically non-profit making) community events, gatherings 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 across the whole plan area including the Cranbrook Plan area.

Commented [A368]: Minor change to clarify relevance is to facilities.

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.

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[152] 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.

This policy applies across the whole plan area including 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.

[152] ~~Marketing Statement Guidance , Viability Statement Guidance~~ ECN-014 - Marketing Statement Guidance, https://eastdevon.gov.uk/media/uaqnwowh/ecn-012-marketing-statement-guidance.pdf , ECN-017 - Viability Statement Guidance , https://eastdevon.gov.uk/media/i5lj4cb1/ecn-015-viability-statement-guidancedocx.pdf

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.

- 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. There will also be ongoing monitoring of the emerging Greater Exeter Transport Strategy to ensure sustainable travel measures are performing as expected and indicate whether further action is required to achieve modal shift from the private car to sustainable travel modes. The Marlcombe Transport Vision proposes a governance body to oversee its implementation, with a monitoring framework to track its progress including overall mode share, bus patronage, and resident surveys. This ongoing monitoring will inform future reviews of the Local Plan and associated infrastructure planning. Whilst monitoring of Habitat Regulation Assessment associated mitigation strategies and their delivery will be in place, specifically in respect of:

- Water Quality at River Axe SAC - ensuring nutrient neutrality and delivery of mitigation measures.
- Air Quality at East Devon Heaths SAC / SPA - delivery of the strategy for mitigation of the potential adverse impact of rising vehicle emissions on the East Devon Heaths SAC / SPA.

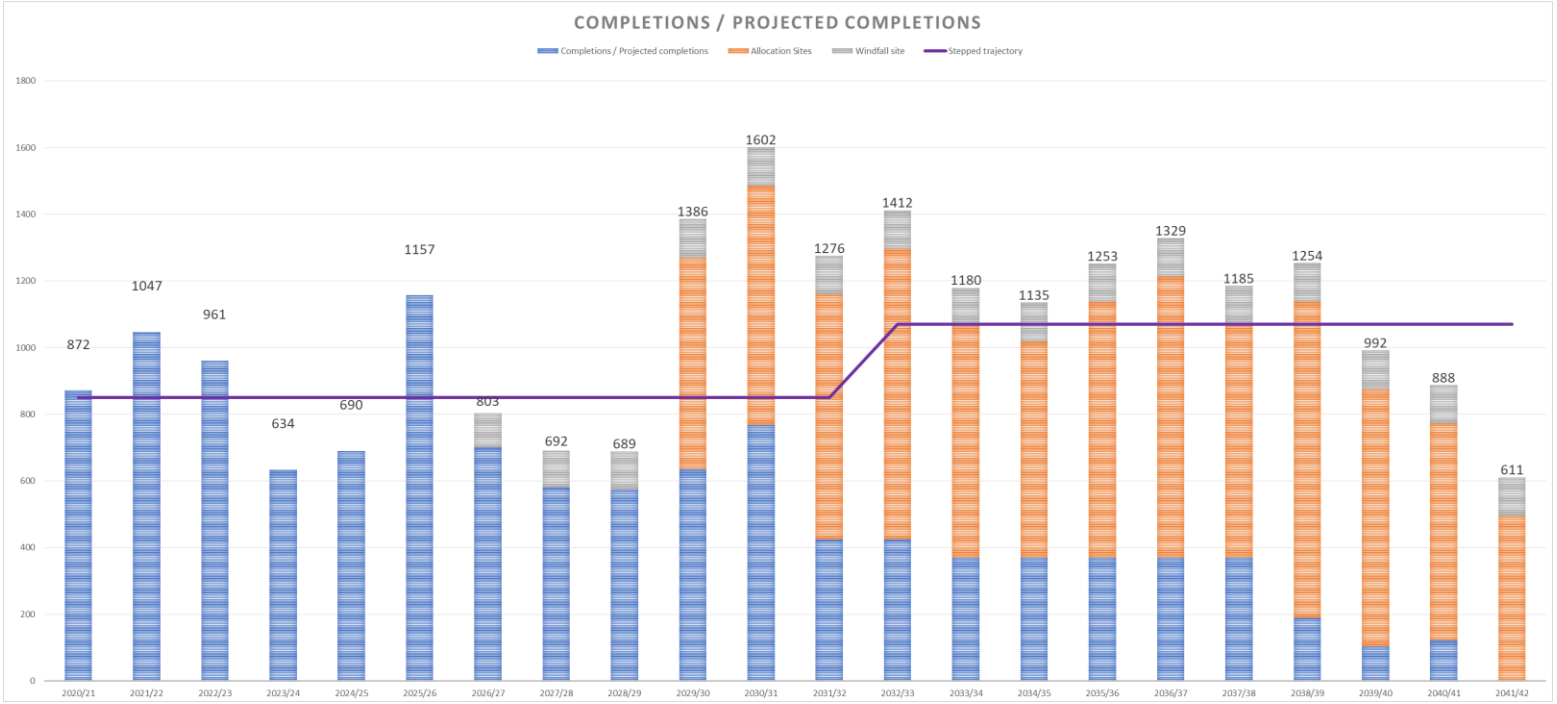
17.3. In accordance with National Planning Policy and relevant regulations, the council will ~~also~~ review policies to assess need for policy updates at least every five years.

Commented [A369]: Inclusion as recommended by National Highways.

Commented [A370]: Inclusion as recommended by Natural England

Commented [A371]: Additional text highlights the need for five yearly review in accordance with requirements of the NPPF.

Appendix 1 – Local Plan housing trajectory



Appendix 2 – Designated Neighbourhood Area Housing Requirement Figures Breakdown

(Please note: These figures have been recalculated based on the 2025 Monitoring Point for completions and commitments and the final housing allocations set out in this document and the more detailed breakdown for each DNA will~~will~~ be available for the further Regulation 19 stage consultation)

DESIGNATED NEIGHBOURHOOD AREA (DNA)	Local Plan Allocations	Adopted Cranbrook Plan Allocations	Neighbourhood Plan* Allocations (without planning permission)	Future Neighbourhood Plan Provision	Completions 01/04/2020 to 31/03/2025~~4~~	Commitments ~~01/04/2020 to~~at 31/03/2025~~4~~	TOTAL DNA Minimum Housing Requirement Figure
All Saints	0	0	0	0	2	~~0~~1	~~2~~3
Axminster	1,086	0	0	0	~~212~~236	~~111~~69	~~1,409~~1,391
Axmouth	0	0	0	0	1	3	**4**
Aylesbeare	0	0	0	0	2	~~6~~13	~~8~~15
Beer	0	0	0	0	~~6~~9	~~38~~35	**44**
Bishops Clyst (Sowton and Clyst St Mary) #	0	0	~~0~~72	~~72~~0	~~10~~12	87	~~169~~171
Broadclyst	214	~~90~~121	44	0	~~1,001~~1,223	~~1,033~~940	~~2,382~~2,542
Broadhembury	10	0	0	0	18	~~11~~9	~~39~~37
Budleigh Salterton	35	0	0	0	~~48~~47	~~49~~53	~~132~~135
Chardstock	30	0	0	0	0	0	**30**

Commented [A372]: As per notes against Policy SP03, the figures have been updated for the final Reg 19 plan, based on the allocations in the plan and the 2025 Monitoring Point. A decision will be made as to whether they are now fixed or will be updated again for the 2026 MP prior to submission. To note we are not consulting on the figures and the methodology behind them has already been consulted on and is now finalised.

Commented [A373]: Correction

Commented [A374]: As per note against Policy SP03, this neighbourhood plan, including allocation for at least 72 homes, is due to be 'made' (adopted) before the further Regulation 19. As part of the update to the figures, this will be moved into the adjacent "Neighbourhood Plan Allocations" column.

Clyst Honiton #	0	0	9	0	2	~~0~~1	~~11~~12
Clyst St. George	596	0	0	0	~~1~~2	2	~~599~~600
Colyton and Colyford	61	0	0	0	~~27~~28	~~81~~80	**169**
Cotleigh	0	0	0	0	0	0	**0**
DESIGNATED NEIGHBOURHOOD AREA (DNA)	Local Plan Allocations	Adopted Cranbrook Plan Allocations	Neighbourhood Plan* Allocations (without planning permission)	Future Neighbourhood Plan Provision	Completions 01/04/2020 to 31/03/2025~~4~~	Commitments ~~01/04/2020 to~~at 31/03/2024~~5~~	TOTAL DNA Minimum Housing Requirement Figure
Dalwood	0	0	0	0	0	2	**2**
Dunkeswell	43	0	0	0	~~5~~14	~~2~~416	~~72~~73
East Budleigh with Bicton	~~22~~15	0	0	0	~~3~~4	5	~~30~~24
Exmouth	1,305	0	0	0	~~483~~594	~~523~~432	~~2,311~~2,331
Farringdon #	0	0	0	0	~~2~~4	3	~~5~~7
Feniton	102	0	0	0	16	9	**127**
Hawkchurch	12	0	0	0	3	2	**17**
Honiton	~~528~~672	0	0	0	~~167~~217	~~144~~104	~~839~~993
Kilmington	28	0	24	0	5	2	**59**
Luppitt	0	0	0	0	1	~~1~~3	~~2~~4
Lympstone	200	0	0	0	~~11~~39	~~112~~111	~~323~~350
Membury	0	0	0	0	2	2	**4**
Monkton	0	0	0	0	1	0	**1**
Newton Poppleford and Harpford	~~55~~40	0	0	0	~~10~~11	11	~~76~~62
Otterton	10	0	0	0	15	2	**27**
Ottery St. Mary (including Tipton St John)	323	0	5	0	~~107~~121	~~48~~44	~~483~~493

Commented [A375]: Correction

Payhembury	15	0	0	0	7	~~16~~21	~~38~~43
Plymtree	30	0	0	0	~~3~~4	~~9~~14	~~42~~48
Rockbeare	0	~~780~~719	0	0	~~14~~15	~~12~~13	~~806~~747
DESIGNATED NEIGHBOURHOOD AREA (DNA)	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~~5~~	Commitments ~~01/04/2020 to~~at 31/03/2025~~4~~	TOTAL DNA Minimum Housing Requirement Figure
Seaton	284	0	0	0	~~71~~84	~~168~~166	~~523~~534
Sidmouth (including Sidford and Sidbury)	~~215~~200	0	0	0	~~71~~72	~~185~~230	~~471~~502
Stockland	0	0	0	0	1	2	**3**
Uplyme	0	0	19	0	~~13~~15	~~12~~10	**44**
Upottery	0	0	0	0	~~1~~3	~~2~~7	~~3~~10
West Hill	64	0	0	0	4	~~2~~9	~~70~~77
Whimple	83	500	0	0	14	14	**611**
Woodbury (including Exton)	311	0	0	0	19	~~35~~39	~~365~~369
Yarcombe	0	0	0	0	~~1~~2	~~5~~4	**6**

Commented [A376]: Correction

Notes:

Designated Neighbourhood Areas (DNAs) in East Devon predominantly equate to whole parished areas under the administrative remit of a single town or parish council, (with the exception of Clyst Honiton where the DNA excludes areas of strategic development within this parish).

Commented [A377]: For clarity

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 2024~~November 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 2025~~4~~ Monitoring Point (31/03/2025~~4~~).

Further information on the methodology for calculating the housing requirement and more detail on the figures for each DNA can be found in the Method options for calculating housing requirements for DNA East Devon Technical Report[153], and the DNA Housing Requirements figures tables[154].

Commented [A378]: Updated to read "November 2025" to align to latest position.

Commented [A379]: Updated to the 2025 Monitoring Point, based on the latest HMU.

Commented [A380]: Document containing the detailed breakdown of figures by each DNA is also being updated to a V3. When available, this reference/hyperlink will be updated, linked to the current Housing Monitoring Update. This will be available shortly and by the launch of the final Regulation 19 consultation.

[153] HOU-013 - Method options for calculating housing requirements for Designated Neighbourhood Areas in East Devon, https://eastdevon.gov.uk/media/kltbuqo1/hou-013-technical-report-designated-neighbourhood-areas.pdf

[154] HOU-014 - Designated Neighbourhood Area Housing Requirement Figures, https://eastdevon.gov.uk/media/0qzdlspc/hou-014-dna-hr-tables-2024-v2.pdf

Appendix 3 – Glossary of terms

This glossary is intended to assist readers by explaining how planning terms have been applied in the context of this Local Plan but it is not plan policy and definitions within it do not carry policy status or weight. The glossary does not provide a definitive legal definition of terms, and readers should refer to legislation and national planning guidance for a full picture.

Affordable housing

Housing for sale or rent, for those whose needs are not met by the market. Subject to the NPPF definitions, it can includes: social rent, affordable rent, discounted market sales housing and other affordable routes to home ownership (e.g. shared ownership, rent to buy). Affordable housing in East Devon is expected to meet local needs, with a target of up to 40% provision on strategic sites like Marlcombe, subject to viability. Tenure mix typically includes 65% social rent and 35% intermediate housing, with flexibility in areas like Axminster.

Air Quality Management Areas (AQMAs)

East Devon recognises AQMAs in areas where development may impact air quality, particularly near strategic transport corridors and urban centres. Mitigation measures are expected in planning proposals.

Ancient woodland/veteran tree

Ancient woodland has been continuously wooded since at least 1600AD and includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS). **Ancient trees** are of exceptional biodiversity, cultural or heritage value due to their age, size, or condition. All ancient trees are **veteran trees**. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage and they are important protected features in East Devon, especially within National Landscapes and near designated biodiversity sites. Development proposals must avoid harm and incorporate enhancement measures.

Article 4 Direction

A direction made under Article 4 of the Town and Country Planning Order that withdraws permitted development rights and is used selectively in East Devon to protect important features, such as conservation areas, town centres, and sensitive landscapes from inappropriate development.

Best and most versatile agricultural land
Land in grades 1, 2 and 3a of the Agricultural Land Classification. This land is the most productive so will usually be prioritised for agricultural use.

Biodiversity Net Gain (BNG)
Biodiversity net gain is the requirement for development to deliver measurable improvements in biodiversity (wildlife value) compared to before the site was developed. East Devon requires a minimum of 10% BNG, with major development expected to deliver 20%. BNG must be demonstrated through a **Biodiversity Gain Statement** and integrated into site design.

Brownfield land
Also called **previously developed land**, this is land which has been lawfully developed and is or was occupied by a permanent structure, excluding agricultural or forestry buildings, land in built up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape. Priority is given to such sites for housing and employment, subject to viability and environmental constraints. The Council maintains a **Brownfield Land Register** of previously developed land which it considers to be appropriate for residential development, having regard to criteria in the Town and Country Planning (Brownfield Land Registers) Regulations 2017.

Build to Rent
Purpose-built housing that is typically 100% rented out, professionally managed in single ownership and often includes longer tenancy agreements. Build to Rent schemes are supported in East Devon where they contribute to housing diversity. At least 20% of units must be affordable private rent homes, with single ownership and management.

Carbon Sequestration
Carbon sequestration refers to the proc ess of capturing and storing atmospheric carbon dioxide. In East Devon, this is promoted through tree planting, soil health restoration, and green infrastructure, particularly within the Clyst Valley Regional Park and other nature recovery initiatives.

Climate Change Adaptation and Mitigation

Adaptations are the adjustments made in response to actual or expected climate change effects, to mitigate harm or exploit beneficial opportunities, and are often implemented alongside mitigation actions to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions. The Local Plan integrates climate adaptation through flood resilience, water efficiency, and green infrastructure, while mitigation focuses on net-zero carbon development, renewable energy, and embodied carbon reduction in construction.

Coastal Change Management Area (CCMA)

An area identified in plans as likely to be affected by coastal change (erosion, landslip, permanent inundation, flooding, etc.) over the next century. CCMAs in East Devon are mapped using University of Plymouth and Environment Agency data. Development is restricted based on short-, medium-, and long-term erosion risk, with time-limited permissions and relocation policies for vulnerable uses.

Coastal Preservation Area

In East Devon CPAs are defined on the basis of visual openness and views to and from the sea or estuaries. These areas are protected from development that will damage the undeveloped, open, status of the area.

Conservation

The process of maintaining and managing change to an important feature in a way that sustains and, where appropriate, enhances it. Conservation in East Devon includes protecting listed buildings, conservation areas and historic landscapes as well as natural features and habitats. Policies require sensitive design and mitigation measures.

Countryside

This is everywhere outside a settlement boundary and can include developed or urbanised areas.

Decentralised Energy

Energy supply from local sources, usually renewable or low carbon, not connected to the national grid. East Devon promotes decentralised energy through district heating networks (e.g. Cranbrook), solar installations, and battery storage, particularly in strategic developments like Marlcombe.

Delivery

To be considered **deliverable,** sites must be available now, offer a suitable location for development now, and be achievable with a realistic prospect of delivery within five years. Deliverable sites in East Devon include those with planning permission, allocations in the Local Plan, and those supported by infrastructure delivery strategies. The housing trajectory and five-year land supply assessments guide deliverability.

The **Housing Delivery Test** measures net homes delivered in a local authority area against the homes required, using national statistics and local authority data. The Secretary of State will publish the Housing Delivery Test results for each local authority in England annually.

Design Codes, Design Guides and Masterplans

Design codes are a set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. Design codes in East Devon are expected for large sites like Marlcombe and major strategic allocations. They guide layout, density, materials, and integration with green infrastructure and heritage assets.

Design guides provide guidance on how development can be carried out in accordance with good design principles. In East Devon design guides will support local distinctiveness, sustainability, and beauty in development. They are used alongside design codes to inform planning decisions and community expectations.

A **masterplan** will set out proposals for buildings, spaces, movement and land use in a defined area over a defined period. It will be influenced by any relevant design codes or guides.

Development Plan

Defined in section 38 of the Planning and Compulsory Purchase Act 2004, 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.

The **Local Plan** sets out the planning policies for the future development of East Devon, drawn up by East Devon District Council (as the local planning authority) in consultation with the community, under the Town and Country Planning (Local Planning) (England) Regulations 2012. This local plan consists of **strategic policies** (which guide the overall spatial strategy, and include housing and employment allocations, infrastructure delivery, and climate change mitigation) and **non-strategic policies**.

Employment

Employment sites are those with a primary focus on Use Classes E(g), B2, and B8, with limited other employment uses as appropriate. **Employment and Skills Statements** aim to maximise local employment and skills opportunities and will be required on major development sites.

Flooding

Flood risk is a combination of the probability and the potential consequences of flooding and this needs to be managed to minimise risk to safety and damage. Areas at risk of flooding are those at risk of flooding from any source, now or in the future. Sources include rivers and the sea, direct rainfall on the ground surface, rising groundwater, overwhelmed sewers and drainage systems, reservoirs, canals and lakes and other artificial sources. For areas at risk of river and sea flooding, this is principally land within Flood Zones 2 and 3 or where a **Strategic Flood Risk Assessment** shows it will be at risk of flooding in the future. It can also include an area within Flood Zone 1 which the Environment Agency has notified the local planning authority as having critical drainage problems. **Natural Flood Management** manages flood and coastal erosion risk by protecting, restoring and emulating the natural 'regulating' function of catchments, rivers, floodplains and coasts.

Green Infrastructure

A network of multi-functional green spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits. GI in East Devon includes parks, woodlands, trails, and the Clyst Valley Regional Park. It supports biodiversity, recreation, flood resilience, and carbon sequestration, and is integral to strategic developments like Marlcombe.

Habitats Site

Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate **Special Areas of Conservation** (areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites), Sites of Community Importance, Special Areas of Conservation, **Special Protection Areas** (Areas classified under regulation 15 of the Conservation of Habitats and Species Regulations 2017) which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds and any relevant Marine Sites.

Irreplacable habitats would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand

dunes, salt marsh and lowland fen.

Heritage assets and the Historic Environment

The **historic environment** results from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. The Historic Environment Record is a collection of information that provides the public with comprehensive and dynamic resources relating to the historic environment of East Devon.

A **heritage asset** is a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing or through a made Neighbourhood Plan). The **Setting** of a heritage asset is the term used for the surroundings in which a heritage asset is experienced. The **significance** of a heritage asset is its value to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.

Development proposals may require a **Heritage Impact Assessment** (HIA), which is a document that outlines the historic or archaeological significance of a heritage asset within its wider setting. It includes an outline of any proposed works, an assessment of their impact on the asset and a mitigation strategy.

Heritage coast

Areas of undeveloped coastline which are managed to conserve their natural beauty, heritage, and, where appropriate, to improve accessibility for visitors.

Infrastructure Delivery Plan

The strategy and framework which sets out how and when infrastructure needed to support development will be required/provided. It covers matters such as utilities, transport, education, open space, community facilities and health and leisure services.

International, national and locally designated sites of importance for biodiversity – see also Habitats Site

All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Special Scientific Interest) and locally designated sites including Local Wildlife Sites.

Landscape Sensitivity Assessment
A landscape sensitivity assessment (LSA) explains the likely effects of different development scenarios on landscape. An LSA uses evidence, such as landscape character, to show how resilient a landscape might be to change. It can inform a plan, policy, or strategy for land use change on development, such as the location of new renewable energy or housing.

Local Development Order
An Order made by a local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a specific development proposal or classes of development. In East Devon, Power Park, adjoining the airport, is subject to an LDO granting permission for employment use.

Local Green Space
Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities. It is designated through the Local Plan or Neighbourhood Plan.

Major development
For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m^2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Major hazard sites, installations and pipelines
Sites and infrastructure, including licensed explosive sites and nuclear installations, around which Health and Safety Executive (and Office for Nuclear Regulation) consultation distances to mitigate the consequences to public safety of major accidents may apply.

Mineral Safeguarding Area
An area designated by minerals planning authorities (in this case Devon County Council) which covers known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development. Within this area, DCC will be consulted on any proposals for non-minerals development.

National Landscape

Areas which were formerly known (and are still legally designated) as areas of outstanding natural beauty (AONBs) under the National Parks and Access to the Countryside Act 1949 and Countryside and Rights of Way Act 2000 but now known as National Landscapes. Around two thirds of East Devon is covered by National Landscape, including the whole East Devon NL and parts of the Blackdown Hills and Dorset NLs. These areas are protected from major development unless exceptional circumstances apply and the Council has a duty to 'seek to further' their statutory purpose in making planning decisions.

National Planning Policy Framework (NPPF)

The NPPF is issued by the Government and it sets out government's planning policies for England and how these are expected to be applied. The most up to date draft of the NPPF (as at November 2025) was issued on 12 December 2024 and whilst this draft has informed local plan policy sand clearly sets a direction of travel of Government policy, under transitional plan making regulations we are working to the draft of the NPPF updated in September 2023 and revised in December 2023. The NPPF also contains a glossary of terms that can usefully be consulted.

Nature Recovery Network

An expanding, increasingly connected, network of wildlife-rich habitats supporting species recovery, alongside wider benefits such as carbon capture, water quality improvements, natural flood risk management and recreation. It includes the existing network of protected sites and other wildlife rich habitats as well as and landscape or catchment scale recovery areas where there is coordinated action for species and habitats.

Neighbourhood Plan

A plan prepared by a parish or town council or neighbourhood forum for a designated neighbourhood area, legally known as neighbourhood development plans. East Devon has 27 made neighbourhood plans (this number will change during the life of the local plan) and more information can be found at Neighbourhood Plans - East Devon. These can supersede non-strategic policies and shape local development, housing allocations, and design standards.

Nutrient Neutrality

Development achieves nutrient neutrality when the nutrient load created through additional wastewater (including surface water) from the development is mitigated. The Local Plan requires development in sensitive locations (for example in the River Axe catchment) to be designed alongside suitable

mitigation measures, to ensure that additional nutrient loads can be avoided or mitigated. It essentially allows developments to be permitted without impacting on the condition of protected sites.

Open space

All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Planning condition

A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

Planning obligation

A legal agreement entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Playing field

The whole of a site which encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Priority habitats and species

Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006.

Ramsar sites

Wetlands of international importance, designated under the 1971 Ramsar Convention.

Renewable and low carbon energy

Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

Rural exception sites

Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.

Safeguarding zone

An area defined in *Circular 01/03: Safeguarding aerodromes, technical sites and military explosives storage areas*, to which specific safeguarding provisions apply.

Self-build and custom-build housing

Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.

Settlement Boundary

Settlement boundaries in East Devon define the limits of built-up areas. Development within boundaries is generally supported, while proposals outside are subject to countryside policies.

Supplementary Planning Documents

Documents which add further detail to the policies in the development plan.

Sustainable Drainage System

Drainage systems designed to manage surface water sustainably controlling run off close to where it falls, combining a mixture of built and nature-based techniques to mimic natural drainage as closely as possible, and accounting for the predicted impacts of climate change. The type of system that would be appropriate will vary from small scale interventions such as permeable paving and soakaways that can be used in very small developments to larger integrated schemes in major developments. SuDS in East Devon are required for major developments to reduce flood risk, improve water quality, and support biodiversity. They must be integrated into site design.

Sustainable Transport Modes

Transport modes that have lower environmental impact, such as walking, cycling, and public transport. The Local Plan promotes sustainable transport through active travel networks, bus service improvements, and infrastructure in strategic developments.

Transport Assessment / Transport Statement/Travel Plans

Transport assessment is a comprehensive and systematic process that considers and sets out transport issues relating to a proposed development, in the context of the vision for the scheme. It identifies measures required to support alternatives to the car such as walking, cycling and public transport, and to promote accessibility and safety, together with mitigation measures. They will usually be required for major developments in East Devon, especially in the West End and strategic allocations. **Transport Statements** are a simplified version where it is agreed the transport issues arising from development proposals are limited and a full transport assessment is not required.

Travel Plans are a long-term management strategy to encourage sustainable travel. They will be required for major developments in East Devon to promote walking, cycling, public transport, and reduce car dependency. They are linked to infrastructure delivery strategies.

Town Centres

These are mainly located in the Tier 1 and 2 settlements (as well as Cranbrook, Budleigh Salterton, Colyton and, in future, Marlcombe) and are defined on the policies map. They include the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. **Main uses within the town centres** are: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Primary shopping areas define areas where retail development is concentrated within the town centres.

Where large retail uses are proposed outside of town centres, a sequential test will be required. This prioritises town centre locations, followed by **edge of centre locations** (for retail purposes this is a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange) and then **Out of centre locations** (which are not in or on the edge of a centre but not necessarily outside the urban area).

Wildlife Corridor

Wildlife corridors in East Devon connect habitats and support biodiversity. They are integrated into green infrastructure networks and protected through site design and mitigation policies.

Windfall Sites

These sites are not specifically identified in the local plan but come forward for development. Windfall sites contribute to housing and employment land supply in East Devon, especially within settlement boundaries. They must align with the spatial strategy.

World Heritage Site (Jurassic Coast)

A site inscribed by UNESCO for its outstanding universal value. The Jurassic Coast World Heritage Site is protected from inappropriate development. Natural processes must be allowed to continue within it, and proposals must demonstrate no adverse impact on its integrity.

~~Glossary to be inserted here~~

East Devon District Council

East Devon Local Plan 2020-2042

Infrastructure Delivery Plan



November 2025 – Version 02

East Devon – an outstanding place

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1 Introduction

1.1 Infrastructure delivery is fundamental to supporting sustainable development. Strategic and well-planned infrastructure ensures that new developments contribute positively to community needs and objectives.

1.2 Developments lacking appropriate infrastructure risk being suboptimal or unacceptable.and may result in environmental harm Comprehensively understanding infrastructure requirements and establishing robust delivery mechanisms is crucial for substantiating the Local Plan, informing planning documents, guiding Community Infrastructure Levy allocations, and supporting broader council initiatives.

1.3 This Infrastructure Delivery Plan (IDP) will supersede the November 2017 version and will sit alongside the adopted IDP for the adopted Cranbrook Plan DPD. A separate IDP for the planned new community will be published later this year, and therefore, those projects are not included in the current document.

1.4 Recognising the dynamic nature of infrastructure development, this IDP will be treated as a 'living document', regularly updated to reflect project completions, emerging development opportunities, and evolving community needs. The identified projects are restricted to physical infrastructure such as roads, bridges, buildings, utilities, public spaces, and transportation networks, funded through diverse sources extending beyond Section 106 and Community Infrastructure Levy.

1.5 Complementing this IDP, East Devon District Council has previously adopted a Planning Obligations Supplementary Planning Document, which provides clear guidance on development obligations and supports high-quality, infrastructure-supported development.

1.6 This IDP has been developed through comprehensive consultation with key stakeholders, including: ·

- Devon County Council (as Local Transport Authority, Local Education Authority, Minerals and Waste Planning Authority, Lead Local Flood Authority and Council responsible for various adult and young people's services);
- South West Water
- National Grid;
- Western Power;
- Natural England;
- Historic England;
- Environment Agency;

- Network Rail;
- Royal Devon University Healthcare NHS Foundation Trust;
- Devon and Cornwall Police;
- Sport England;
- Stagecoach;
- Highways England;
- Various Telecommunications providers.

2 Definition of infrastructure

2.1 Infrastructure projects are classified into priority levels:

- **Priority 1:** fundamental to the delivery of the vision, objectives and policies of the Local Plan. This infrastructure is critical, without which development may not be able to come forward.

- **Priority 2:** important to deliver specific development schemes, strategies and to meet the needs of new residents, but the precise timing is less critical.

- **Priority 3:** enhance the effectiveness, efficiency, and quality of infrastructure. These projects create a better place to live and work, and are generally desirable in order to build sustainable communities. These include Neighbourhood Plan infrastructure related projects which can be found in relevant Neighbourhood Plans.

3 Schedule of projects

Education projects								
Reference	**Priority**	**Location**	**Project**	**Cost**	**Potential Funding Sources**	**Timescale**	**Delivery Organisation(s)**	**Notes/additional justification**
EDU-1	1	Axminster	Expanded Primary Education Provision	£3,532,900	Development Contributions, DCC	2027-2035	Devon County Council	Expansion of existing primary education infrastructure by 175 places in total to meet the needs of planned development at strategic policy SD02. Phase 1 of expansion at Axminster primary school has already been completed.
EDU-2	1	Axminster	Improved and additional Secondary Education facilities	£1,752,000	Development Contributions, DCC	2030 - 2042	Devon County Council	Improved and additional facilities at Axe Valley Academy to meet the needs of planned development at strategic policies SD02, SD05, SD09, SD13, SD19, SD20, and SD21.
EDU-3	1	Honiton	Improved Secondary Education facilities	£500,000	Development Contributions, DCC	2030 - 2042	Devon County Council	Improved facilities at Honiton College to meet the needs of planned development at strategic policies SD03 and SD15.
EDU-4	1	West End - North of Topsham OR The New Community Location TBC	New primary and early years places provided at North of Topsham or in the New Community and 1.8ha land for education purposes at North of Topsham	£3,668,038	Development Contributions, DCC	2032 - 2035	Devon County Council	146 primary school places and provision for early years to be provided through new education infrastructure located in the second new community (WS01) or North of Topsham (WS10) to serve development proposed at strategic policy WS10 during the plan period, North of Topsham. The provision of 1.8ha of education land on site at North of Topsham could provide cross boundary opportunities with ECC (1.8ha is suitable for up to 420 place primary school with early years.)
EDU-5	1	Ottery St Mary	New 210 place primary school with early years provision for 0-5 year old's on a 1.8ha site	£9,000,000	Development Contributions, DCC	2029 - 2032	Devon County Council	This will meet the needs of planned development at strategic policy SD04, SD18, SD24, SD27 and SD28 by ensuring there are sufficient school places in Ottery St Mary for the children living in Ottery St Mary. A 1.8ha site will future proof the school allowing for expansion for 420 places if required in the future.
EDU-6	1	West End	Expanded Secondary Education facilities	£3,581,943	Development Contributions, DCC	2025 - 2035	Devon County Council	Expanded secondary education provision to meet the needs of planned development in the area at strategic policies WS04, SD14, SD07 and SD29.

EDU-7	1	Ottery St Mary	Improved Secondary Education facilities	£500,000	Development Contributions, DCC	2025 - 2035	Devon County Council	Improved facilities at The King's School to meet the needs of planned development at strategic policies SD04, SD18, SD24, SD27 and SD28.
EDU-8	1	Devon	New SEND education infrastructure	£2,346,552	Development Contributions, DCC	2025 - 2042	Devon County Council	This accounts for all sites of more than 150 dwellings. This does not include the new community. (WS01) which will include SEND provision on-site as part of the all through campus.
EDU-9	1	Second New Community	All through campus on 17.3ha of safeguarded land: 630 primary school places / early years provision for 0-5yrs / 1500 secondary school places (footprinted for 1900 places)/ 80 place special education provision / Post 16 provision	Early Years: £630,000 Primary: £15,814,890 Secondary: £43,800,000 Post-16: £17,520,000 SEND: £9,344,160 (Total: £87,109,050)	Development Contributions, DCC	2029 – 2042 and beyond (phased delivery)	Devon County Council	This education provision will meet the needs of Marlcombe, the second new community (WS01) and the wider aspiration of the plan during the plan period (2020 – 2042). 17.3ha required to facilitate future expansion of the campus beyond the plan period, particularly to meet secondary education requirements which will require additional capital funding beyond the figures included here. Included on the basis that will provide for area wider than just new community.
EDU-10	1	Second New Community	New 420 primary school places with early years provision for 0-5 year old's on a 1.8ha site	£10,543,260	Development Contributions, DCC	2029 - 2042	Devon County Council	This education provision will meet the needs of Marlcombe, the second new community (WS01) during the plan period (2020-2042) and the wider aspiration of the plan for the development of Marlcombe.
EDU-11	2	West End / Mosshayne	New Primary School up to 210 places with early years provision for 0-5 year old's at land North of Blackhorse/Redhayes (Tithebarn Green / Mosshayne)	£9,000,000	Development Contributions, DCC	2025 - 2030	Devon County Council	To provide education provision for extant allocations at Mosshayne / Tithebarn.
Community Facilities projects								
Reference	**Priority**	**Location**	**Project**	**Cost**	**Potential Funding Sources**	**Timescale**	**Delivery Organisation(s)**	**Notes/additional justification**
COM-1	1	Ottery St Mary	Extension to Police Station	£114,156	CIL, Devon and Cornwall PCC	2025-2042	Devon and Cornwall PCC	Additional demand generated from levels of proposed growth
COM-2	1	Axminster	Extension to Police Station	£308,654	CIL, Devon and Cornwall PCC	2025-2042	Devon and Cornwall PCC	Additional demand generated from levels of proposed growth
COM-3	1	Exmouth	Replacement Police Station	£522,729	CIL, Devon and Cornwall PCC	2025-2042	Devon and Cornwall PCC	Additional demand generated from levels of proposed growth
Environment & GI Projects								
Reference	**Priority**	**Location**	**Project**	**Cost**	**Potential Funding Sources**	**Timescale**	**Delivery Organisation(s)**	**Notes/additional justification**

ENV-1	1	East Devon (Exe Estuary and Pebblebed Heaths)	Habitat Regulations Assessment mitigation (Suitable Alternative Natural Greenspace provision and SAMM) delivered through updated South East Devon Habitat Mitigation Strategy	TBC	ECC, TDC, EDDC, DCC, Natural England, Environment Agency, developers	2025 - 2042+	East Devon District Council, Natural England, Developers, Landowners	The SE Devon European Site Mitigation Strategy is currently under review and will identify measures required to mitigate the additional development on the European protected sites.
ENV-2	2	West End	Clyst Valley Regional Park	TBC	S106, CIL, BNG	2025 - 2042+	East Devon District Council, Natural England, Environment Agency, National Trust, Developers, Landowners	The CVRP is a key strategic priority for the Council to deliver. The Council has adopted a Masterplan which outlines the priorities for delivery to 2045.
Recreation and Sport Projects								
Reference	**Priority**	**Location**	**Project**	**Cost**	**Potential Funding Sources**	**Timescale**	**Delivery Organisation(s)**	**Notes/additional justification**
REC-1	2	Exmouth	Delivery of sports pitch uses at Courtlands Cross	TBC	S106, CIL, external funding/grants	2029 - 2034	Developer	Requirements set out in the Local Plan for delivery adjacent to Lymp_07 allocation. Further details will be set out in the 2025 playing pitch strategy.
REC-2	2	Seaton	Delivery of football pitch to the north of Seaton	TBC	S106, CIL, external funding/grants	2029 - 2034	Developer	Requirements set out in the Local Plan for delivery as part of the Seaton allocation Seat_03 and Seat_05. Further details will be set out in the 2025 playing pitch strategy.
REC-3	2	East Devon	Additional sports pitch provision and improvements across the district	TBC	CIL, external funding/grants (P)	2025 - 2042	Clubs, NGBs, EDDC, Sport England, others	A new playing pitch strategy is currently in production for the District, this will identify key projects for delivery. We anticipate having further details for this for at submission.
Flood Risk and Coastal Change Projects								
Reference	**Priority**	**Location**	**Project**	**Cost**	**Potential Funding Sources**	**Timescale**	**Delivery Organisation(s)**	**Notes/additional justification**
FLO-1	2	Sidmouth	Beach Management Plan actions	£20,000,000	EDDC, Govt funding and external funding sources.	2025 - 2035	East Devon District Council	A £20m scheme is currently being designed to protect more than 110 homes and 70 businesses and further details. Funding for the project has largely been secured largely due to £16m from Govt.
FLO-2	2	Exmouth	Beach Management Plan actions	TBC	EDDC, Govt funding and external funding sources.	2025 - 2035	East Devon District Council	Work is ongoing on updating the existing Beach Management Plan to manage the risks of coastal flooding and erosion at Exmouth. Possible costs of project could be up to £23m depending on the chosen option.
Transport Projects								
Reference	**Priority**	**Location**	**Project**	**Cost**	**Potential Funding Sources**	**Timescale**	**Delivery Organisation(s)**	**Notes/additional justification**

TRA-1	1	West End	Additional passing loop on Waterloo train line and associated signalling infrastructure	£50,000,000	Network Rail, EDDC, DCC, DfT, CIL	2025 - 2031	Network Rail, Devon County Council	This project would form part of an extension of the Devon Metro structure, and will enable a half hourly service between Axminster and Exeter. It provides mitigation against the road traffic impacts from the Cranbrook expansion areas. Potential location near Feniton. The additional passing loop can enhance capacity through enabling greater train service frequency, making rail a more attractive and effective travel option. Cost is DCC estimate, Network Rail have not yet determined the cost. Mosshayne planning application re-submitted - will now be considered under CIL system, which could mean the potential contribution may not be secured.
TRA-2	1	Exmouth	Road extension – The completion of Dinan Way to the A376	£15,800,000	DCC, ETC, EDDC, LUF	2024 - 2025	Devon County Council	Scheme allocated LUF funding. Has planning permission and Cabinet approval. Delivery started and completion scheduled for December 2025 subject to final DfT signoff.
TRA-3	2	Axminster	Improved footpath and cycleways linking town centre to developments in the north.	TBC	S106, CIL, DCC	2028 - 2042+	Developer, Devon County Council	Draft Local Plan Strategic Policy SD02 proposes development on the northern side of Axminster (allocations Axmi_17, Axmi_18, GH/ED/83). Infrastructure enhancements will be needed to enable safe pedestrian and cycle access to these sites from Axminster town centre.
TRA-4	2	West End	Public Transport enhancements to improve bus priority between Exeter City Centre and West End development	£1,000,000	S106, CIL, DCC	2021 - 2026	Devon County Council, Developer, Bus operator	e.g. bus priority measures through Science Park / SkyPark, improvements to bus priority (including priority signalling) at/approaching M5 J29.
TRA-5	2	Sidmouth	Otter Trail - Sidmouth to Feniton cycle route	£1,400,000	S106, CIL, STC, DCC	2025 - 2042	East Devon District Council, Devon County Council, Developer	16km route that loosely follows the old railway line. Cost taken from 'Feniton to Sidmouth (Otter Valley) Trail, Feasibility study - draft report', Sustrans, 2014. Cost includes at-grade crossing of the A3052 - a bridge would add £1.5m. Included in Countywide LCWIP.
TRA-6	2	Sidmouth	Sidbury to Sidford cycle route	£1,000,000	S106, CIL, Sidmouth Town Council, DCC	2025 - 2031	East Devon District Council, Devon County Council, Developer	Sidford employment allocation should contribute a section. Included in Countywide LCWIP
TRA-7	2	Seaton to Axminster Cycle Route	Beer to Axminster and Uplyme cycle route	TBC		long term	DCC	Included in Countywide LCWIP
TRA-8	2	West End	Clyst Valley Trail	£14,000,000	S106, CIL, DCC, National Highways	2025 - 2042+	East Devon District Council, Devon County Council, Developer	The Clyst Valley Trail would be a 13km walking and cycling route linking West Clyst and Topsham, via Clyst Honiton, Sowton and Clyst St Mary. Designed to facilitate both commuting and leisure trips, it would form the backbone of the proposed Clyst Valley Regional Park (IDP Priority 1,Strategic Policy WS09). A Public Consultation on the trail was undertaken in 2022, and the trail is identified as a priority

								scheme in the Clyst Valley and New Communities LCWIP.
TRA-9	2	North of Topsham	Comprehensive package of transport measures to prioritise active travel and public transport in the Clyst Road area. To include: - Continuous north-south walking and cycling route (Exeter LCWIP route E13) - Enhancements to support walking/cycling on Old Rydon Lane - Upgrade of Clyst Road to facilitate two-way bus route - Bus service enhancements - Shared mobility hubs - Area-wide travel planning	TBC	S106, CIL, DCC	2025-2042	Devon County Council, Developer, Bus operator	Draft Local Plan Strategic Policy WS10 proposes significant employment and residential development in the Clyst Road area, with draft text stating that a Development and Infrastructure Delivery Framework will be required, to include 'A comprehensive transport strategy to prioritise active travel and public transport'.
TRA-10	2	North of Topsham	Additional pedestrian/cycle crossings of the M5 and Avocet line to provide a more direct route between development North of Topsham and Newcourt (including Newcourt station)	TBC	TBC	2025-2042	Devon County Council, National Highways, Network Rail	The M5 and Avocet line currently sever the Clyst Road area from Newcourt, meaning walking/cycling routes towards Newcourt station are significantly extended. Therefore, new crossings (either bridges or underpasses) are suggested to maximise the uptake of walking, cycling and rail among residents of this area.
TRA-11	3	Exmouth	Improvements to existing Avocet Line stations, including lengthening platforms and improving facilities.	TBC	S106, Train operating Company, DfT, DCC. Network Rail, CIL	2025 - 2042	Network Rail, Train Operating Company	
TRA-12	3	Sidmouth	Provision of new access into the Alexandria Trading Estate from the Bulverton Road (B3176)	£1,000,000	S106, CIL, DCC	2025-2042	East Devon District Council, Devon County Council, Developer	This access would relieve Alexandria Road and Pathwhorlands from industrial traffic and provide a safer access, and would be supported by EDDC.
TRA-13	3	Cowley	Section of proposed Boniface Trail	TBC	S106, CIL, DCC	2025-2042	Devon County Council	Section around Cowley is within East Devon although no development planned around there.
TRA-14	3	Ottery St Mary	Improvements to walking/cycling networks – creating centre link between the western development sites and town centre, employment areas and schools.	TBC	S106, CIL, DCC	2025-2042	Devon County Council, Developer	Draft Local Plan Strategic Policy SD04 proposes significant development on the western side of Ottery St Mary (allocations Otry_01b, Otry_09, Otry_10, GH/ED/27). Infrastructure enhancements will be needed to enable safe pedestrian and cycle access to these sites from Ottery St Mary town centre. May involve creating shared use paths alongside the existing highway, Toucan

								crossings and some areas of new route requiring land negotiation.
TRA-15	2	Broadclyst	Clyst Valley & New Communities LCWIP proposals for Killerton & Broadclyst - enhancements to improve accessibility of existing routes, and creation of new routes	£10,000,000	S106, CIL, DCC	2025-2042	Developer, Devon County Council	In line with the LCWIP, improvements to routes around Broadclyst and the wider Killerton Estate (including Ashclyst Forest) are recommended, including enhancements to the E2 route alongside the B3181, a new off-road between Broadclyst and Cranbrook Station, and widening and resurfacing of the existing Broaclyst-Killerton route, to improve active travel opportunities for existing Broadclyst residents and residents of planned development.
Healthcare Projects								
Reference	**Priority**	**Location**	**Project**	**Cost**	**Potential Funding Sources**	**Timescale**	**Delivery Organisation(s)**	**Notes/additional justification**
HEA-1	1	Matford (Phase 1)	GP surgery with 7 consulting rooms which would be branch site of Ide Lane practice	£2,000,000	S106, CIL, external funding sources	2025-2030	TBC - combination of ICB, Council and/or 3rd party developer	Costs may increase in event of any further delays
HEA-2	1	Matford (Phase 2)	3 additional consulting rooms and open office/admin space in the undercroft of the Phase 1 building.	£2,000,000	S106, CIL, external funding sources	2025-2030	TBC - combination of ICB, Council and/or 3rd party developer	Costs may increase in event of any further delays
HEA-3	1	Pinhoe GP Practice	Extension to provide 6 additional clinical rooms and further admin space	£1,153,000	S106, CIL, external funding sources	2025 - 2026	TBC - combination of ICB, Council and/or 3rd party developer	The surgery is facing a projected 56% increase in patient numbers over the next 10 years due to new local housing
HEA-4	1	Seaton	The PCN aspires to make greater use of Seaton Hospital, a central location that can cater for PCN teams (both clinical and non-clinical).	£250,000	S106, CIL, external funding sources	2025-2030	TBC	Waiting to see what RDUH space requirements are in order to understand if there will be any space left over. No update as at 30/10/24. Figure of £250k is a cost estimate and could be higher once detailed work is done.
HEA-5	3	Axminster	65 unit Extra Care Housing Scheme	TBC	S106, CIL, external funding sources	2025-2033	Developer, Devon County Council, Care Provider	Need identified in Extra Care Housing Refresh of the Commissioning Strategy for Extra Care Housing, Devon CC, 2015.
HEA-6	3	Exmouth	189 units of Extra Care Housing (likely to be provided across 2 or more schemes)	TBC	S106, CIL, external funding sources	2025-2033	Developer, Devon County Council, Care Provider	Need identified in Extra Care Housing Refresh of the Commissioning Strategy for Extra Care Housing, Devon CC, 2015.
HEA-7	3	Honiton	72 bed Extra Care Housing Scheme	TBC	S106, CIL, external funding sources	2025-2033	Developer, Devon County Council, Care Provider	Need identified in Extra Care Housing Refresh of the Commissioning Strategy for Extra Care Housing, Devon CC, 2015.
HEA-8	3	Ottery St Mary	55 bed Extra Care Housing Scheme	TBC	S106, CIL, external funding sources	2025-2033	Developer, Devon County Council, Care Provider	Need identified in Extra Care Housing Refresh of the Commissioning Strategy for Extra Care Housing, Devon CC, 2015.

HEA-9	3	Seaton	58 bed Extra Care Housing Scheme	TBC	S106, CIL, external funding sources	2025-2033	Developer, Devon County Council, Care Provider	Need identified in Extra Care Housing Refresh of the Commissioning Strategy for Extra Care Housing, Devon CC, 2015.
HEA-10	3	Sidmouth	83 units of Extra Care Housing (likely to be delivered in 1 scheme)	TBC	S106, CIL, external funding sources	2025-2033	Developer, Devon County Council, Care Provider	Need identified in Extra Care Housing Refresh of the Commissioning Strategy for Extra Care Housing, Devon CC, 2015.
HEA-11	3	Exeter Airport	Updating and extension and improvements to Devon Air Ambulance	£9,500,000	Devon Air Ambulance, donor contributions, funraising trusts and foundations, CIL	2025-2030	Devon Air Ambulance	DAA have set aside £4.5m and have commenced a campaisn to raise the rest of the £9.5m. So far, this fundraising has secured pledges totalling approximately £500k.
Utilities Projects								
Reference	**Priority**	**Location**	**Project**	**Cost**	**Potential Funding Sources**	**Timescale**	**Delivery Organisation(s)**	**Notes/additional justification**
UTI-1	1	Feniton	A total of 1,060m new water mains will need to be laid within Feniton to enable the growth within the area to go ahead.	£700,000	Forward funding by SWW. Funded through the new connection Infrastructure Charge paid by developers (S)	2028 - 2035	South West Water	This infrastructure needs to be provided alongside the growth and should not be delivered retrospectively following connection of new homes if this growth is to be sustainable. Forward funding of this infrastructure may be needed.
UTI-2	1	Exmouth	Circa 650m of new water main to the west of the village is required to supply the growth.	£650,000	Forward funding by SWW. Funded through the new connection Infrastructure Charge paid by developers (S)	2028 - 2035	South West Water	This infrastructure needs to be provided alongside the growth and should not be delivered retrospectively following connection of new homes if this growth is to be sustainable. Forward funding of this infrastructure may be needed.
UTI-3	1	Axminster	A new water booster would be required to supply part of the growth in Axminster	£250,000	Forward funding by SWW. Funded through the new connection Infrastructure Charge paid by developers (S)	2028 - 2035	South West Water	This infrastructure needs to be provided alongside the growth and should not be delivered retrospectively following connection of new homes if this growth is to be sustainable. Forward funding of this infrastructure may be needed.
UTI-4	1	Ottery St Mary	Circa 700m of new water main to the west of the village is required to supply the growth.	£600,000	Forward funding by SWW. Funded through the new connection Infrastructure Charge paid by developers (S)	2028 - 2035	South West Water	This infrastructure needs to be provided alongside the growth and should not be delivered retrospectively following connection of new homes if this growth is to be sustainable. Forward funding of this infrastructure may be needed.
UTI-5	1	West End	Investment at Countess Wear Sewage Treatment Works to increase capacity for growth.	£15,000,000	Forward funding by SWW. Funded through the new connection Infrastructure Charge paid by developers (S)	2030	South West Water	This infrastructure needs to be provided alongside the growth and should not be delivered retrospectively following connection of new homes if this growth is to be sustainable. Forward funding of this infrastructure may be needed.
UTI-6	1	West End	A new Sewage Treatment Works will need to be constructed	TBC	SWW. Funded through the South West Water business plan,	2030 - 2035	South West Water	Although this will be brought forward principally due to the new community, this has been included due to it serving a wider catchment.

			to serve the East Devon New Community		awaiting final determination from the regulator, Ofwat. (S)			
UTI-7	2	Honiton	New Household Waste Recycling Centre (to replace the old facility near Wilmington)	£8,000,000	National and Local Government; private sector	2025 - 2034	DCC	The outdated Sutton Barton recycling facility is too small, unsafe, and poorly located. A new, modern facility is proposed for the Honiton area (ideally Heathpark) to better serve the population.
UTI-8	3	East Devon	Improve rural broadband to ensure superfast broadband for all by 2020	Not specified	National and Local Government; private sector	2025 - 2042	BDUK, Devon County Council	

Education IDP Notes:

Costs are based on DCC policy at rates at June 2024 rates and subject to indexation.

https://www.devon.gov.uk/planning/planning-policies/pupil-place-planning/

School site sizes are based on the DfE's BB103 and BB104 guidance (average of min and max areas) Area guidelines for mainstream schools (publishing.service.gov.uk)

Education land to be provided at nil cost to the Education Authority, fully serviced.

In addition, costs for home to school transport will be calculated on an individual site basis at the time the applications are validated.

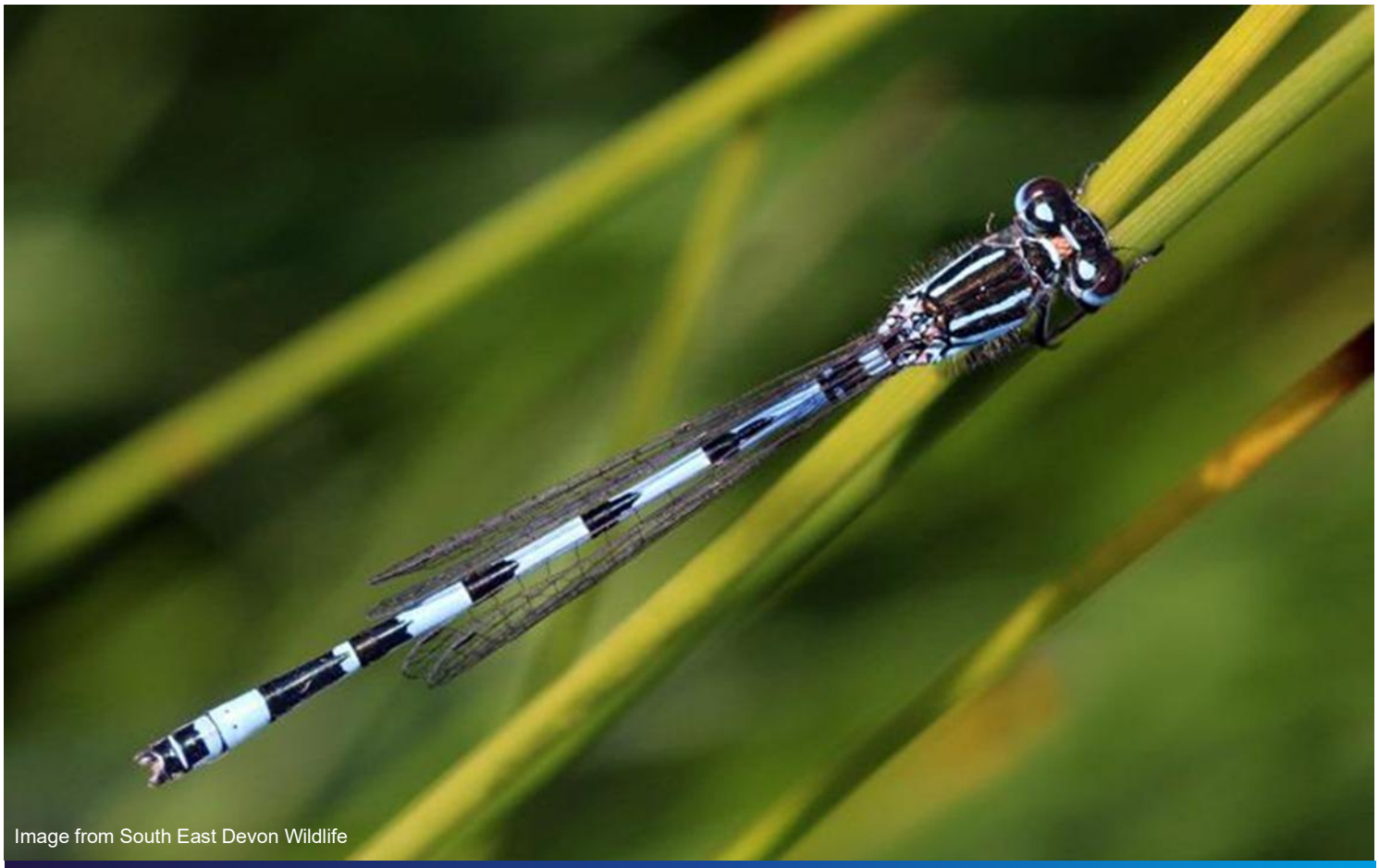


Image from South East Devon Wildlife

MITIGATION OF AIR QUALITY IMPACTS IN EAST DEVON

Mitigation Strategy

Report for: East Devon District Council

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Customer:
East Devon District Council

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Contract dated 12 May 2025

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1. INTRODUCTION

The district of East Devon is located in the county of Devon, and is adjacent to Dorset, Somerset, Mid Devon, and the city of Exeter. There are approximately 150,800 people[1] living in the district area of ~ 815 km^2. East Devon District Council (EDDC) is preparing a new local plan that will cover the period from 2020 through to 2042, which envisages the provision of approximately 21,000 new homes, as well as increased employment and commercial floorspace over the plan period[2]. The East Devon Local Plan (EDLP) has been developed in line with the Government's objectively assessed requirement for housing growth levels.

East Devon is characterised by its exceptional natural features, with over half of the district designated as National Landscape and a World Heritage Site coastline. It also contains numerous nature conservations areas of national and international importance. Increases in road traffic associated with the additional development in the EDLP may have the potential to adversely impact these nature conservation areas through increases in air concentrations of pollutants, particularly oxides of nitrogen and ammonia, and the deposition of these pollutants within sensitive habitats.

The Habitats Regulations Assessment (HRA) work undertaken to date has screened out the potential for adverse impacts at many of the internationally designated sites across the district; however, it has highlighted specific concerns relating to potential impacts on the East Devon Pebblebed Heaths (EDPH) Special Area of Conservation (SAC) and Special Protection Area (SPA).

This report contains an overview of the work undertaken to date, in regard to site condition and functioning, the Habitats Regulation Assessment outcomes, and the development of mitigation options as well as the steering group meetings that assisted in their creation and the next steps to ensure that there are no adverse effects to the Pebblebed Heaths designated sites.

2. OVERVIEW OF SITE INFORMATION AND FUNCTIONING

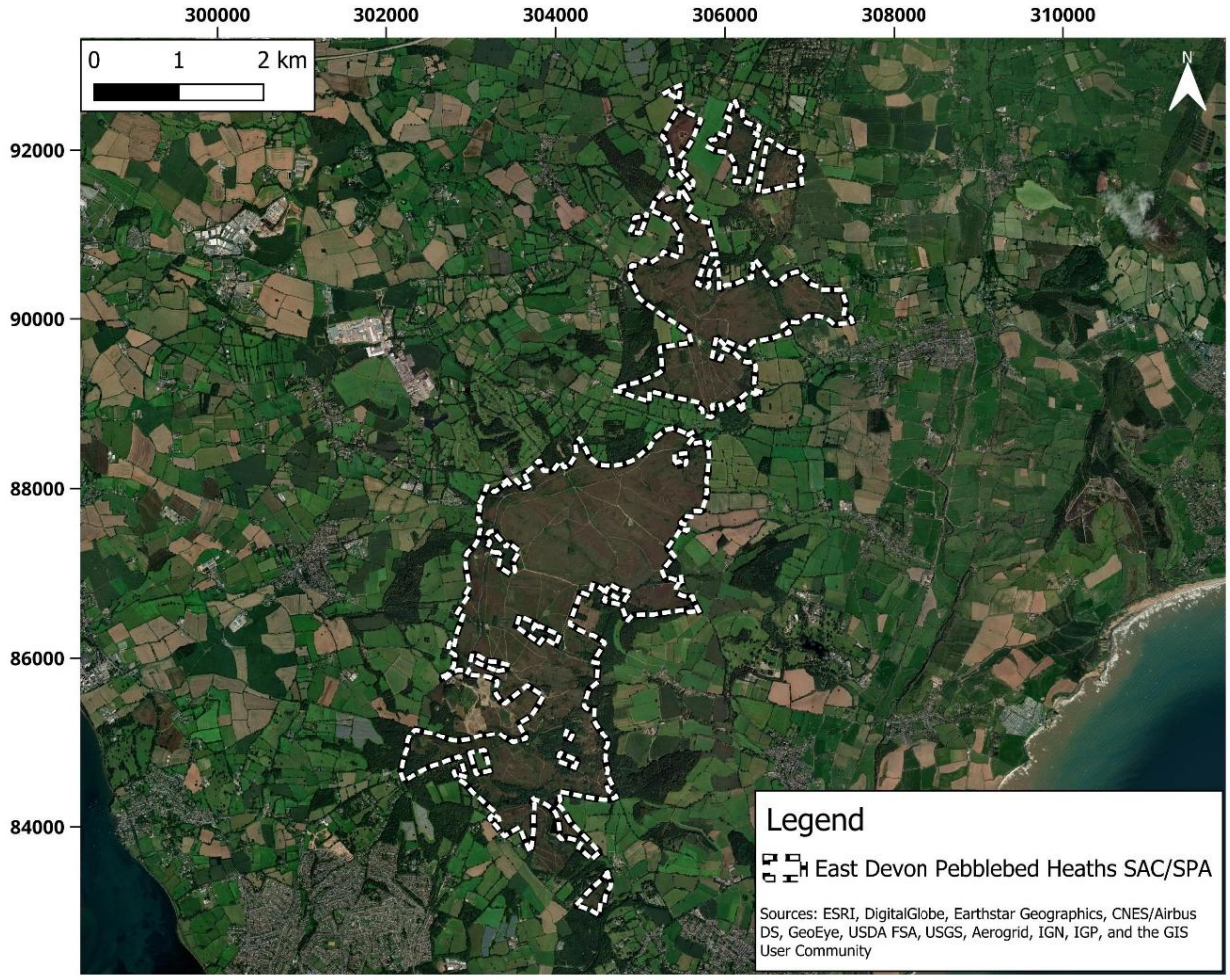
The East Devon Pebblebed Heaths (EDPH) are protected by multiple designations. This includes SAC, SPA, Sites of Species Scientific Interest (SSSI), and National Nature Reserve (NNR) designations. The East Devon Pebblebed Heaths SAC is designated for its Annex 1 habitats of northern Atlantic wet heaths with *Erica tetralix*, its European dry heaths, and its Annex 2 species of the *Coenagrion mercurial* (Southern Damselfly). The East Devon Heaths SPA is designated for important breeding birds including *Caprimulgus europaeus* (European Nightjar) and *Sylvia undata* (Dartford Warbler),

The SAC and SPA are legally underpinned by the East Devon Pebblebed Heaths SSSI. The SSSI is designated for breeding Dartford warbler, breeding European nightjar, assemblages of breeding birds, lowland dry acid grassland, lowland dry heath, lowland wet heath, *Ceriagrion tenellum* (small red damselfly), southern damselfly, outstanding dragonfly assemblages, and lowland valley fen. The Pebblebed Heaths NNR is part of the East Devon National Landscapes and covers approximately 1156ha including the SSSI. Detailed information on site information can be found in the Ricardo 2025 *Mitigation of Air Quality Impacts in East Devon – Long list mitigation summary report.* Figure 2-1 provides an overview of the location of the EDPH SAC and SPA.

[1] East Devon District Council: Census 2021, accessed 22/07/2025: https://eastdevon.gov.uk/council-and-democracy/knowing-east-devon/census-2021/

[2] East Devon Emerging Local Plan 2020-42: Draft (February 2025)

Figure 2-1 Overview of EDPH SAC and SPA boundary



2.1 SITE FUNCTIONING

2.1.1 General site function and condition

The SAC and SPA do not have condition assessments directly related to their qualifying features. As such, condition of relevant SSSI features and units have been used as a proxy to SAC/SPA condition.

There are 10 site features listed for the SSSI. Of these site features, eight are in “favourable” condition, one is in “unfavourable – no change” condition, and one is in “unfavourable – declining” condition. Details on site feature condition can be found in **Table 2-1**.

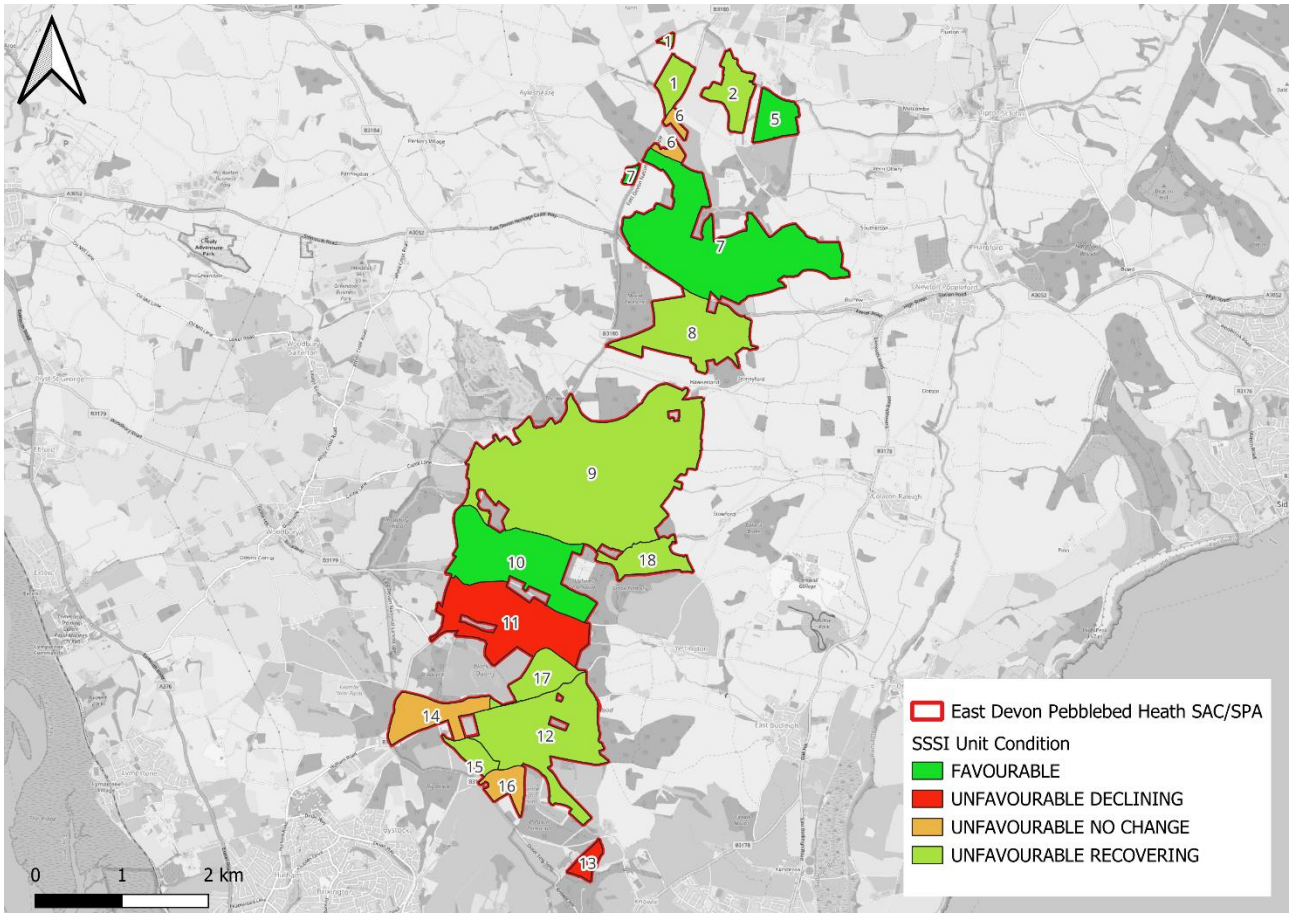
Table 2-1 – Condition of SSSI features

SSSI Feature	Condition
Aggregations of breeding birds Dartford warbler, *Sylvia undata*	Favourable
Aggregations of breeding birds - Nightjar, *Caprimulgus europaeus*	Favourable
Assemblages of breeding birds - variety of species	Favourable
Lowland dry acid grassland	Favourable
Lowland dry heath	Unfavourable no change
Lowland wet heath	Favourable

SSSI Feature	Condition
Nationally rare and scarce dragonfly species *Ceriagrion tenellum*, Small Red Damselfly	Favourable
Nationally rare and scarce dragonfly species – *Coenagrion mercuriale* Southern Damselfly	Unfavourable declining
Outstanding dragonfly assemblage	Favourable
Valley Fen (Lowland)	Favourable

There are 16 units within the SSSI, all of which have been categorised as dwarf shrub heath lowland. The locations of each unit and their condition can be seen in **Figure 2-2.** Of the 16 units, three are in favourable condition (Units 005, 007, 010), three are in unfavourable-no change condition (Units 006, 014, 016), eight are in unfavourable-recovering condition (Units 001, 002, 008, 009, 012, 015, 017, 018), and two units are in unfavourable declining condition (Units 011, 013). More specific information for the site condition assessments can be found in the Ricardo 2025 *Mitigation of Air Quality Impacts in East Devon – Long list mitigation summary report.*

Figure 2-2 Current SSSI Unit condition



Several pressures have been identified for the SAC in the Site Improvement Plan (SIP)[13]. These pressures are negatively impacting the overall functioning of the site. The pressures listed for the SAC in the SIP are also relevant for the SPA. These include:

- Inappropriate scrub control
- Under-grazing

- Changes in land management
- Public access and disturbance
- **Air pollution – atmospheric nitrogen deposition**
- Water pollution – nutrient enrichment
- Hydrological changes

Similar pressures have been identified for the SSSI. Pressures specific to the SSSI not included in the SAC/SPA SIP include stock feeding, weeds and inappropriate species, and freshwater Invasive Non-Native Species (INNS) excluding fish.

The conservation objectives and status of a SAC or SPA must be taken into account when carrying out a HRA, both when determining the likelihood of a significant effect on site integrity, and also when designing mitigation measures. Any such measures should not hinder the implementation of planned measures that are already in place to achieve the site's conservation objectives.

2.1.2 Air quality impacts to the designated site

The main focus of this report is to identify mitigation for pressures related to air quality. Air quality concerns have been raised for the East Devon Pebblebed Heaths SAC and the East Devon Heaths SPA as increases in air pollutants to the site may impact the overall condition and functioning of the site. These concerns have been outlined in the combined Site Improvement Plan and the Supplementary advice on conserving and restoring site features for both the SAC and SPA. The adverse effects related to air quality are impacting upon the supporting processes (on which the feature relies) Conservation Objective for all species and habitats found within the SAC and SPA. The SAC supplementary advice states that: "*Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it.".*[3] The SPA supplementary advice states that "*Exceeding critical values for air pollutants may result in changes to the chemical status of its habitat substrate, accelerating or damaging plant growth, altering vegetation structure and composition and thereby affecting the quality and availability of nesting, feeding or roosting habitats*."[4].

The Air Pollution Information System's (APIS) figures for the critical load (CL) for nitrogen inputs to dry heathland are 10-20 kg/ha/year and in wet heathland 10-25 kg/ha/ year, with the lower end of this range applied to sites with low intensity management. On the Pebblebed Heaths designated sites, the level of nitrogen deposition was estimated to be 20 kg/ha/yr in 2005, dropping to 15.68kg/ ha/yr by 2020[5].. At present, APIS estimates the level of nitrogen deposition to be 14-15kg/ha/yr[6]. Although there has been a decline in nitrogen levels at the site, they are still exceeding the lower CL provided by APIS. As such, a restore target has been put in place relating to the supporting processes Conservation Objective. The target states "*Restore as necessary, the concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values given for this feature of the site on the Air Pollution Information System (www.apis.ac.uk)."*[7].

2.2 SITE MANAGEMENT

The site is managed by multiple organisations including Natural England, Clinton Devon Estate, Devon Wildlife Trust, the RSPB, and the East Devon Pebblebed Heaths Conservation Trust. Recreational use at the site is limited by parking availability. General landscape and habitat management across the site includes felling and scrub management, grazing by cattle and ponies, scraping, mowing along roadside and for fire breaks, and burning. Scraping is used to remove the vegetation, and topsoil is carried out in discrete areas to target particular invertebrates Tree removal is also carried out where appropriate to maintain the heathland habitat.

[3]Natural England (2019) Supplementary advice on conserving and restoring site features: East Devon Pebblebed Heaths SAC UK0012602_East Devon Pebblebed Heaths_SAC_Published 10 Jul 2024

[4] Natural England (2019) Supplementary advice on conserving and restoring site features: East Devon Heaths SPA UK9010121_East Devon Heaths_SPA_Published 10 Jul 2024

[5] Bridgewater, S. M. G., and Kerry, L. M. (2016) East Devon Pebblebed Heaths Spaces for Nature Report. Biodiversity Audit. East-Devon-Pebblebed-Heaths.-Providing-Space-for-Nature-2016.pdf

[6] APIS app (2025) APIS app | APIS

[7] [7]Natural England (2019) Supplementary advice on conserving and restoring site features: East Devon Pebblebed Heaths SAC UK0012602_East Devon Pebblebed Heaths_SAC_Published 10 Jul 2024

Site specific management practices can be in the Ricardo 2025 *Mitigation of Air Quality Impacts in East Devon – Long list mitigation summary report.*

The site management activities were used to inform what potential mitigation were already in place to combat the impacts of air pollution. The management activities were also used to determine if additional management practices could be introduced or if existing practices could be intensified in order to be included in the long list of mitigation measures.

3. OVERVIEW OF AIR QUALITY HABITATS REGULATIONS ASSESSMENT

This section provides an overview of the Air Quality HRA in the context of the mitigation options development process. A summary of the key outcomes is provided below, with more detailed information available from the Ricardo 2025 "*Mitigation of Air Quality Impacts for the East Devon Pebblebed Heaths*" Technical Report.

3.1 METHODOLOGY

Air quality impacts on the designated site were assessed based on predicted annual average airborne concentrations of NOx and NH_3, together with annual deposition rates of nutrient nitrogen and acid. A sub-regional air dispersion model (RapidAIR) was used to model predicted air quality impacts at locations within the site at a resolution of 3m x 3m.

Three scenarios were generated to determine the air quality impacts associated with the local plan allocations:

1. 2022 Base Year: This scenario was designed to replicate 2022 traffic conditions within the study area in order to verify the performance of the air dispersion model.
2. 2042 Future Base: This scenario assumed background traffic growth in line with DfT's TEMPRO software (v8.0). Additionally, it included all known current development and infrastructure, as well as all committed development and infrastructure, up to 2042. Development associated with the EDLP was excluded from this scenario. This was a hypothetical scenario against which to test the impacts of the EDLP, as it assumes there will be no development within the district up to 2042 other than at sites which already have planning permission.
3. 2042 Future Year with Local Plan: This scenario is equivalent to the '2042 Future Base' scenario, with the addition of development proposed in the EDLP. A comparison of both scenarios made it possible to assess any impacts attributable to the EDLP in isolation.

The contributions attributable to the local plan were first compared to the screening threshold of 1% of the Critical Load or Critical Level applicable for each pollutant at the designated site. Likely Significant Effects (LSEs) were discounted where the model results and analysis indicated that the contribution from the local plan, alone and in-combination with other applicable plans and projects, is below the 1% screening threshold. Where the screening analysis indicated that LSEs on the designated site could not be ruled out, further analysis was undertaken in the form of an HRA Stage 2 Appropriate Assessment. This aided in refining the areas in which there could potentially be adverse effects related to air pollution, and therefore informed the development of the mitigation options for those areas.

3.1.1 In combination assessment

The dispersion modelling described above accounts for air quality impacts associated with road traffic emissions from development of the EDLP in isolation. However, guidance from Natural England[15], developed following the requirements of the Wealden Judgment, advises that the screening thresholds should be applied with consideration to impacts from individual proposed developments and with consideration to in-combination effects. In this study, in-combination impacts have been considered in the following ways:

1. The NOx pollutant background maps[16] used in the air dispersion model account for existing industrial activity, including large combustion installations, airports and shipping activity. Known industrial sources are modelled explicitly in the baseline year of the background maps, and future-year background maps are derived by incorporating datasets from the UK Department for Business, Energy & Industrial Strategy (BEIS) regarding projected energy and economic activity data for various

industrial sectors. The background maps therefore account for future growth in industrial sector emissions, within the limits of current government growth projections.

2. The National Infrastructure Planning website[23] was investigated to identify any potentially relevant major developments. This review did not highlight any relevant projects in the vicinity of the study area.
3. The district of East Devon shares its borders with Exeter, Teignbridge, and Mid Devon, with Somerset and Dorset nearby. Local Plan HRA studies from these neighbouring authorities were reviewed in order to extract relevant information concerning other sources of in-combination effects. In summary, potential in-combination impacts from all five neighbouring local authorities' Local Plans were ruled out based on the evidence available.

Please see the Ricardo 2025 "*Mitigation of Air Quality Impacts for the East Devon Pebblebed Heaths*" Technical Report for more detail on the consideration of in-combination impacts.

3.2 HRA STAGE 1: ASSESSMENT OF IMPACTS AGAINST SCREENING THRESHOLDS

3.2.1 Screening thresholds

Table 3-1 summarizes all of the critical loads for nutrient nitrogen deposition (kgN/ha-year) and acid deposition (kEq/ha-year), as well as the critical levels for airborne ammonia (µg/m^3) and airborne NOx (µg/m^3), applicable to the designated site. The most stringent critical load or critical level (CL) for each pollutant is indicated in bold[8].

The data provided in Table 3-1 is derived from APIS and is based on direct effects to the qualifying feature itself. We note that although the species in Table 3-1 are identified as not sensitive to airborne NH_3 and NOx, the habitats that support these species are sensitive and therefore mitigation will be required to meet the conservation objectives for these species.

[8] Air Pollution Information System, accessed 22/07/2025: https://www.apis.ac.uk/app

Table 3-1 Minimum Critical Load and Critical Level (CL) values and associated sensitive features for East Devon Pebblebed Heaths SAC and East Devon Heaths SPA

Designation	Sensitive feature	Minimum nutrient nitrogen deposition CLs (kgN/ha-year)	Minimum acid deposition CLs (MinCLMaxN, kEq/ha-year)	Minimum airborne NH_3 CLs ($\mu g/m^3$)	Minimum airborne NOx CLs ($\mu g/m^3$)
SAC	**European dry heaths**	**5**	**1.205**	**1**	**30**
SAC	**Northern Atlantic wet heaths with *Erica tetralix***	**5**	**1.205**	**1**	**30**
SAC	**Southern damselfly *Coenagrion mercuriale***	**5**	**1.205**	**1**	**30**
SPA	**European nightjar *Caprimulgus europaeus* (unmanaged broadleaved / coniferous woodland)**	**5**	**0.894**	**Not sensitive**	**Not sensitive**
SPA	**European nightjar *Caprimulgus europaeus* (dwarf shrub heath)**	**5**	**1.205**		
SPA	**Dartford warbler *Sylvia undata* (dwarf shrub heath)**	**5**	**1.205**	**Not sensitive**	**Not sensitive**

3.2.2 Screening results

Table 3-2 compares the maximum modelled process contribution (PC) of the EDLP to the lowest applicable CL for each pollutant. Values in **bold** exceed the 1% screening threshold. This screening exercise represents a precautionary approach, as it assumes that the most sensitive qualifying features (with the lowest CLs) are present throughout the site, including in the areas with the highest modelled PC (typically adjacent to the busiest road).

Table 3-2 Screening results based on dispersion modelling of 2042 Future Year with Local Plan scenario

Pollutant	Deposition type	Minimum CL	Maximum modelled PC	Maximum modelled PC as % of CL
Airborne NOx (µg/m^3)	**n/a**	**30**	**1.29**	**4 %**
Airborne NH_3 (µg/m^3)	**n/a**	**1**	**0.23**	**23 %**
Nutrient nitrogen deposition (kgN/ha-year)	**Grassland**	**5**	**1.27**	**25 %**
	Forest	**5**	**1.95**	**39 %**
Acid deposition (kEq/ha-year)	**Grassland**	**0.894**	**0.09**	**10 %**
		1.205		**7 %**
	Forest	**0.894**	**0.14**	**16 %**
		1.205		**12 %**

In summary, for the EDLP, adverse impacts could not be screened out for airborne NOx, airborne NH_3, nitrogen deposition, or acid deposition.

3.3 HRA STAGE 1: FURTHER SCREENING

This assessment considers the potentially damaging aspects of the proposed development in East Devon with potential effects on the EDPH site's qualifying features and likely achievement of conservation objectives. The potential for adverse effect on the integrity of the site depends on the scale and magnitude of the predicted air pollution impacts, taking into account the distribution of the designated features across the site in relation to the predicted impact.

3.3.1.1 Airborne NOx

Current background levels of NOx do not exceed 30 µg/m^3 within the EDPH site, and it is forecast that future concentrations of NOx will decrease significantly from current levels. The NOx background maps are produced by Defra on a periodic basis and are considered the best available information for future background levels of airborne NOx. There is no basis for reasonable scientific doubt in the forecast NOx levels. Additionally, the background map for the year 2040 (the latest year for which a NOx background map is available) is considered likely to over-predict NOx concentrations in 2042, which is the year applicable for our "Future Year with Local Plan" scenario.

Table 3-3 presents the total modelled NOx concentration for the 2042 "Future Year with Local Plan" scenario. The "Future Year with Local Plan" concentrations were added to the 2040 NOx background maps (with minor road contribution removed). The total NOx concentrations were then point-sampled to determine the maximum predicted environmental contribution (PEC).

Table 3-3 Summary of analysis for the maximum modelled total airborne NOx concentration

Scenario	Minimum CL (µg/m^3)	Maximum 2040 Background NOx (µg/m^3)	Maximum modelled PEC (µg/m^3)	PEC as % of CL
2042 Future Year with Local Plan	**30**	**3.2**	**9.7**	**32 %**

The PEC for NOx is predicted to be less than 50% of the applicable CL of 30 µg/m^3 throughout the designated site. On the basis of available evidence and agreed thresholds, it can therefore be concluded that no significant adverse effects are anticipated on the designated site from increased airborne NOx concentrations associated with the EDLP. No further investigation is therefore required for airborne NOx concentrations.

3.3.1.2 Ammonia

There are significant areas of the site that are likely to have European dry heaths, Northern Atlantic wet heaths with *Erica tetralix* present (and therefore the southern damselfly potentially, too), and which are exceeding 1% of the CL of 1 ug/m3 for airborne ammonia. Mitigation measures are needed to address this.

3.3.1.3 Nitrogen deposition

SUMMARY: There are significant areas of the site that are likely to have *Caprimulgus europaeus* (European nightjar), *Sylvia undata* (Dartford warbler) (SPA) and European dry heaths, Northern Atlantic wet heaths with *Erica tetralix, Coenagrion mercuriale* (SAC), which are exceeding 1% of the minimum CL of 5 kgN/ha/yr. Further research could consider where the important breeding sites for the birds and damselflies are, but mitigation measures will be needed to address this.

3.3.1.4 Acid deposition

SUMMARY: Able to rule out LSEs in some areas for some features, but still many exceedances (although smaller than for nitrogen deposition). Further research could consider where the important breeding sites for the birds and damselflies are, but mitigation measures will be needed to address this.

3.3.1.5 Detailed consideration of qualifying features

Table 3-1 below sets out considerations relating to the location of relevant features within the East Devon SAC and SPA.

Table 3-4 Detailed consideration of qualifying features for East Devon Pebblebed Heaths SAC and East Devon Heaths SPA

Designation	Sensitive feature	Potential effects	Adverse effect before mitigation? (on conservation objectives and site integrity)
SAC	European dry heaths	Increases in nitrogen deposition may result in changes of vegetation structure and community may be altered by changes in substrate chemistry and additional nutrients entering the habitat[9]. The SAC Supplementary Advice for Conservation Objectives (SACO) states that "*This habitat type is considered sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it*."[10]. This habitat is located throughout the site and is found in all SSSI Units. Several Units are located outside the CL Exceedance zones. These comprise Unit 002, 005, 012, 017, and 018. As these units are not likely to be impacted due to distance, the aforementioned units have been screened out.	No – for habitat present in SSSI unit 002, 005, 012, 017, and 018. Yes – for other SSSI units
SAC	Northern Atlantic wet heaths with *Erica tetralix*	Additional nutrients, in this case, nitrogen, entering the habitat may cause eutrophication to aquatic habitats and increase the presence of unfavourable species. For non-aquatic habitats associated with wet-heaths, vegetation structure and community may be altered by changes in substrate chemistry and additional nutrients entering the habitat. The SAC Supplementary Advice for Conservation Objectives (SACO) states that "*This habitat type is considered sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it*."[11] This habitat is mainly located in the eastern portion of SSSI Unit 011 and a small parcel is located in the north east of SSSI Unit 017. The entirety of this habitat is located outside of all Critical Load exceedance areas for all identified pollutants. The nearest patch of wet heath is located approximately 500m east from the nearest exceedance zone (nitrogen deposition for tall	No

[9] APIS Acid deposition :: Dwarf Shrub Heath | APIS

[10] Natural England (2019) Supplementary advice on conserving and restoring site features: East Devon Pebblebed Heaths SAC UK0012602_East Devon Pebblebed Heaths_SAC_Published 10 Jul 2024

[11] Natural England (2019) Supplementary advice on conserving and restoring site features: East Devon Pebblebed Heaths SAC UK0012602_East Devon Pebblebed Heaths_SAC_Published 10 Jul 2024

Designation	Sensitive feature	Potential effects	Adverse effect before mitigation? (on conservation objectives and site integrity)
		vegetation). As the habitat is located outside all outlined exceedance zones, no adverse effects are anticipated on the conservation objectives for this feature.	
SAC	Southern damselfly *Coenagrion mercuriale*	This site contains three small populations favouring wet areas of the site[12]. Additional nutrients, in this case, nitrogen, entering the habitat, specifically northern Atlantic wet heaths with *Erica tetralix*, may cause eutrophication to aquatic habitats and increase the presence of unfavourable species not conducive to the survival of the species. The SAC Supplementary Advice for Conservation Objectives (SACO) states that "*The supporting habitat of this feature is considered sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition (including food-plants) and reducing supporting habitat quality and population viability of this feature*." Supporting habitat for this species is located in the eastern portion of SSSI Unit 011 and a small parcel is located in the north east of SSSI Unit 017. The entirety of this habitat is located outside of all Critical Load exceedance areas for all identified pollutants. The nearest parcel of wet heath is located approximately 500m east from the nearest Critical Load exceedance zone (nitrogen deposition for tall vegetation). As the habitat is located outside all outlined exceedance zones, no adverse effects are anticipated on the conservation objectives for this features.	No
SPA	European nightjar *Caprimulgus europaeus* (unmanaged broadleaved / coniferous woodland)	Night jars are associated with woodland edges and are found in woodland habitats when open glades are present. Perches are used in territorial displays and are usually found in mature trees within heathland habitats or along woodland edge. They can also be found in newly regenerated pine plantations. Although woodlands are not considered as a qualifying feature of the SPA, they are considered to be supporting habitat for nightjar. As such, adverse effects are impacting upon the supporting processes (on which the feature relies). The SPA SACO states that "*Exceeding critical values for air pollutants may result in changes to the chemical status of its habitat substrate, accelerating or damaging plant growth, altering vegetation structure and composition and thereby affecting the quality and availability of nesting, feeding or roosting habitats*."[13]..	Yes

[12] JNCC 1044 Southern damselfly Coenagrion mercuriale Southern damselfly (Coenagrion mercuriale) - Special Areas of Conservation

[13] Natural England (2019) Supplementary advice on conserving and restoring site features: East Devon Heaths SPA UK9010121_East Devon Heaths_SPA_Published 10 Jul 2024

Designation	Sensitive feature	Potential effects	Adverse effect before mitigation? (on conservation objectives and site integrity)
SPA	European nightjar *Caprimulgus europaeus* (dwarf shrub heath)	Both species can be found throughout the site, although they favour areas where there is limited disturbance from recreation. The species themselves are not sensitive to airborne pollutants such as NH_3 and NOx, as such, no adverse effects are anticipated for airborne pollutants only. Impacts related to air quality include reduced quality of breeding and foraging habitat due to increases in acidity and nitrogen deposition. This may alter the vegetation communities and structure to favour grassland habitats and the succession of unfavourable species. Both species rely on the dwarf shrub habitat for both breeding and Dartford warblers rely on this habitat for wintering. As such, adverse effects are impacting upon the supporting processes (on which the feature relies). The SPA SACO states that "*Exceeding critical values for air pollutants may result in changes to the chemical status of its habitat substrate, accelerating or damaging plant growth, altering vegetation structure and composition and thereby affecting the quality and availability of nesting, feeding or roosting habitats*."[14].. Supporting habitat for these species are located throughout the site and is found in all SSSI Units. However, several units are located outside the CL Exceedance zones for all pollutants of interest. These include Unit 002, 005, 012, 017, and 018. As these units are not likely to be impacted due to distance, the aforementioned units have been screened out.	No – for habitat present in SSSI unit 002, 005, 012, 017, and 018. Yes – for other SSSI units
SPA	Dartford warbler *Sylvia undata*		No – for habitat present in SSSI unit 002, 005, 012, 017, and 018. Yes – for other SSSI units

[14] Natural England (2019) Supplementary advice on conserving and restoring site features: East Devon Heaths SPA UK9010121_East Devon Heaths_SPA_Published 10 Jul 2024

The discussion above focuses on the zones within which forecast increases in air pollution / deposition rates are above the screening threshold of 1% of the critical levels/loads. However, an impact above the 1% threshold does not automatically mean that an adverse impact will occur.

This was also addressed in the HRA for the EDLP. Appendix 5 of the HRA for the East Devon Local Plan 2020 to 2042 (regulation 19 draft plan)[15] states that it was not possible to exclude the risk to site integrity from ammonia, nitrogen deposition and acid deposition. The air quality assessment goes on to state 'Whilst the contribution above 1% for acid deposition cannot be dismissed as irrelevant it is important to recognise that the predicted environmental concentrations are such that exceedance of the critical load is limited to up to 33m from the road edge on the A3052, up to 17m from road edge on B3180 (South), and up to 5m from the road edge along the B3180 (North). The risk to the overall site integrity from acid deposition is therefore heavily influenced by the small spatial scale over which any exceedance is predicted to occur.

The spatial scale of the impact is an important factor when considering the impact to the ecological functioning of the affected area alongside key guidance from Natural England to consider impacts when air pollution is above the 1% critical level. Other important factors include:

- The European site's conservation objectives.
- Background pollution (review critical loads/levels; check for exceedance; consider trends).
  These have already been taken into account in the modelling work carried out (see Technical Report)
- The designated site in national context.
- The best available evidence on small incremental impacts from nitrogen deposition.
- Site survey information.
- National, regional or local initiatives or measures which can be relied upon to reduce background levels at the site.
  These have already been taken into account in the modelling work carried out (see Technical Report)
- Measures to avoid or reduce the harmful effects of the plan or project on site integrity.
- Any likely in-combination effects with other live plans and projects from other sources.
  This has already been evaluated and no likely in-combination effects were identified

When these aspects were considered in the HRA for the EDLP, the following areas were identified where impacts above the screening thresholds could potentially affect the integrity of the SAC/SPA,

1. North/South along the B3180, the modelling study indicates exceedances of the screening threshold within 400 m of the road (SSSI units 1, 6, 7, 9, 10, 11, 14). Consideration of wider factors indicates a potential likely significant effect on the integrity of the SAC/SPA in a much less extensive zone extending 17 metres from the B3180 (South) and 5 metres from the B3180 (North);
2. East/West along the A3052 Exeter Road, the modelling study indicates exceedances of the screening threshold within 600 m of the road (SSSI units 7,8). Consideration of wider factors indicates a potential likely significant effect on the integrity of the SAC/SPA in a much less extensive zone extending 33 metres from the A3052;
3. Bystock Nature Reserve & Withycombe Raleigh Common adjacent to B3179, the modelling study indicates exceedances of the screening threshold within 300 m of the road (SSSI units 15, 16). Wider factors should also be considered, which would indicate a much more restricted zone around this road likely to extend less than 15 metres from the road;
4. Dalditch Common, the modelling study indicates exceedances of the screening threshold within 150 m of the road (SSSI unit 13). Wider factors should also be considered, which would be expected to indicate a much more restricted zone around this road. This zone may extend less than 5 metres from the road, and there may in fact be no likely significant effect on the integrity of the site near this road.

3.3.1.6 Conclusions and implications for mitigation options development

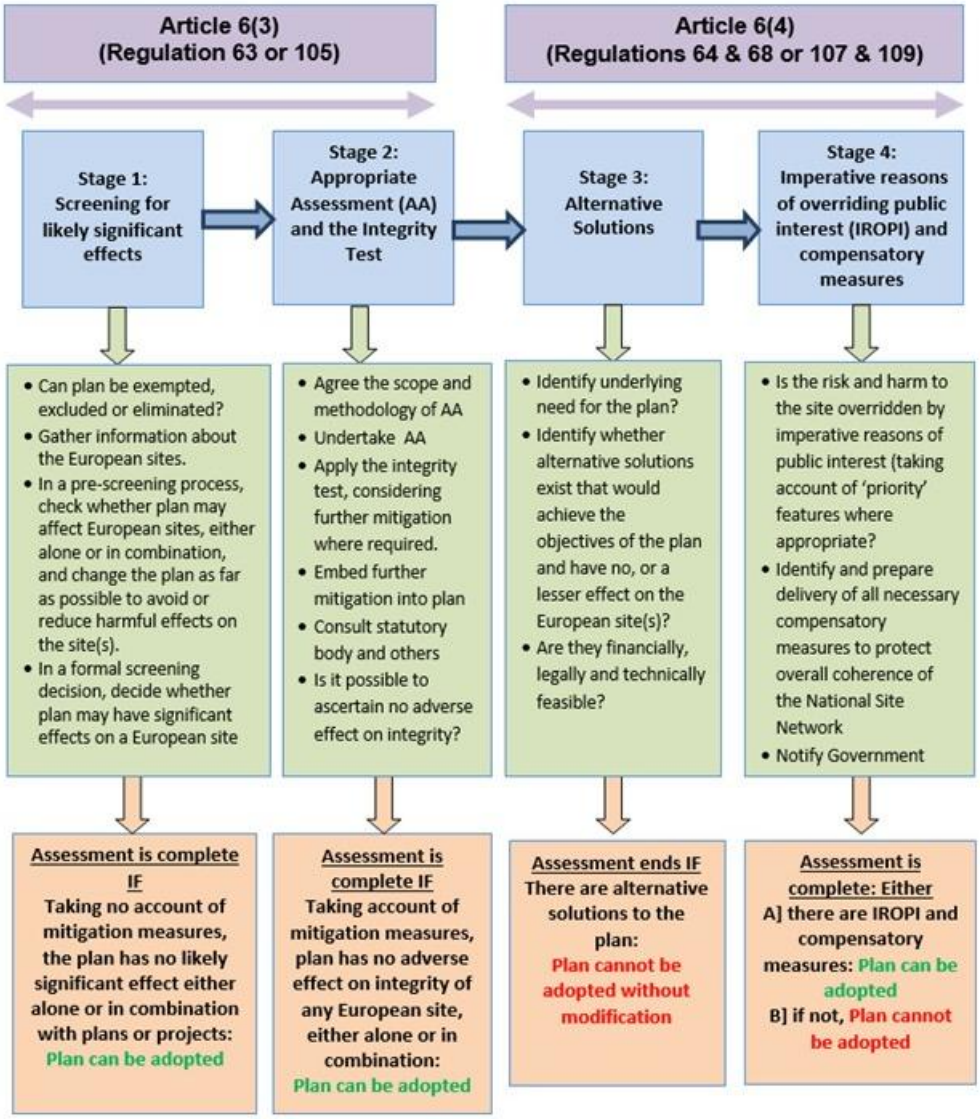
A preliminary review of the East Devon Local Plan 2020-2042: Key Diagram[16] identified that allocations at Sidmouth and Seaton, as well as service centres in East Budleigh, Woodbury and Otterton, Tipton St John are

[15] Habitats Regulation Assessment of the East Devon Local Plan 2020 to 2042 (Regulation 19 Draft Plan), Footprint Ecology (2025)
[16] East Devon Local Plan 2020-2042: Key Diagram, https://eastdevon.gov.uk/media/fuwhycqp/reg-19-key-diagram.pdf

likely to be the allocations that contribute the most traffic to roads passing through the SAC and SPA. This was developed further when considering potential mitigation measures in Section 4.3 of this report.

Figure 3-1 presents the four stage approach to the assessment of plans under the Habitats Regulations. HRA is an iterative process and its purpose is is to ensure that the strategy is compliant with the Habitats Regulations. As the identified mitigation measures do not fully address the adverse effect to the integrity of the site the HRA process cannot be concluded at this time.

Figure 3-1 Outline of the four stage approach to the assessment of plans under the Habitats Regulations. Extracted from The Habitats Regulations Assessment Handbook, DTA Publications Limited[17]

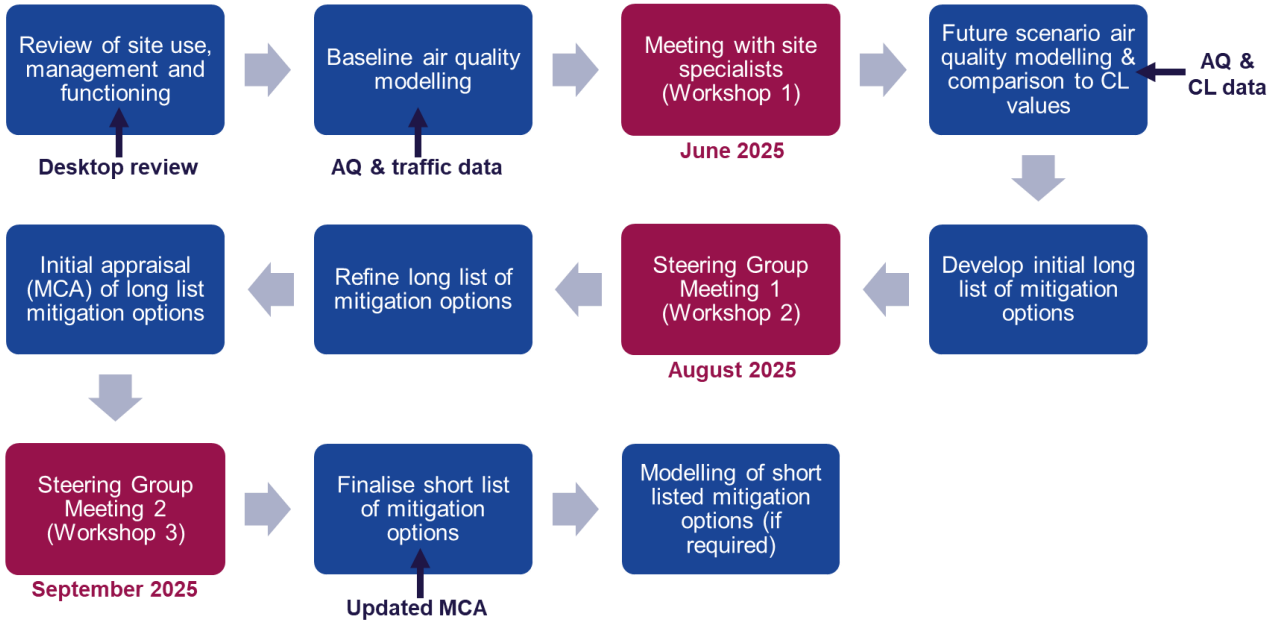


4. DEVELOPMENT OF MITIGATION OPTIONS

The process of developing options to mitigate the potential air pollution impact on the EDPH arising from road traffic associated with the EDLP, is presented in Figure 4-1 below. The process incorporated a desktop review, air quality modelling exercise, and extensive stakeholder engagement via three workshops. The evidence and outcomes leading to the shortlisting of mitigation options are provided in the sub-sections below.

[17] The Habitats Regulations Assessment Handbook, DTA Publications Limited, https://www.dtapublications.co.uk/handbook/

Figure 4-1 Overview of mitigation options development process



4.1 DESKTOP REVIEW

A wide range of potential options were available to EDDC and other stakeholders to mitigate air quality impacts on the East Devon Heaths sites. Therefore, at the onset of the measure development process, it is appropriate to consider all potential options. An initial long list of possible options to mitigate air quality impacts was developed, drawing on:

- Current and predicted air quality impacts on the EDPH, based on the air quality model results
- Current site management plans and future management aspirations
- Ricardo's recent work for Natural England to develop mitigation strategies and measures for the purposes of HRA, including guidance and tools to assist in identifying and designing effective mitigation
- Engagement with local stakeholders (both within the Council and externally) at a Site Specialists' Workshop in June 2025
- The expertise held by the assembled project team including our understanding of the powers held by local authorities, and options that were considered and/or implemented as part of other studies that we have been involved in
- Review of other Planning Authorities' air quality assessments and mitigation strategies
- The DTA Handbook for HRA
- Identification of Potential Remedies for Air Pollution (nitrogen) Impacts on Designated Sites (RAPIDS)
- National Highways
- Review of relevant scientific literature

In addition to providing a list of mitigation options, an effectiveness score was provided using information provided by RAPIDS. This effectiveness score uses the duration of mitigation, percent reduction, and range of mitigation to produce a score of Small, Moderate or Large. Where there are multiple levels of effectiveness, the influencing factors are listed. Not all mitigation options outlined are present in the RAPIDS Report. For these options, we have assigned a score using our own professional judgement.

4.2 STAKEHOLDER ENGAGEMENT

The following provides an overview of the three stakeholder engagement workshops carried out as part of the mitigation options development process:

Workshop 1 (online) – Site Management Specialists (17th June)

- **Aim:** discuss current site management and identify management challenges
- Management practices and challenges, current mitigation measures being implemented and their success, key details around visitor pressure and air pollution concerns
- Any identified changes in management that would align with improving site integrity and provide mitigation

Workshop 2 (online) – First Steering Group Meeting (14th August)

- **Aim:** introduce stakeholders and develop the long list of mitigation measures
- Current site use, management and functioning, local AQ situation, key contributing sources and the extent of the problem to be solved
- Existing mitigation actions and what they are likely to achieve
- Facilitated discussion on further ideas for mitigation options (including provisional long list of options), and complementary mitigation options
- Initial consideration of likely feasibility and acceptability of mitigation options

Workshop 3 (in person) – Second Steering Group Meeting (15th September)

- **Aim:** finalise the shortlist of mitigation measures
- Present the finalised long list of options for the consideration of the group
- Present results of options appraisal (MCA), discussion and refinement of scores by Steering Group
- Refine the long list to an agreed short list of options

The Steering Group included stakeholders from:

- East Devon District Council (including Planning Policy, Environmental Health, Environmental Protection, South East Devon Wildlife, National Landscape, Ecology)
- Devon County Council (including Transport, Ecology and Environment, Public Health, and Planning)
- Pebblebed Heaths Trust (part of Clinton Devon Estates)
- RSPB
- Natural England
- Devon Wildlife Trust

The key points from each workshop, and how they informed development of the mitigation options, are provided in the following sub-sections.

4.2.1 Site Specialists Workshop

This workshop was held on Tuesday 17th June 10:00-11:30 online via Teams. A smaller group of stakeholders from East Devon District Council, Pebblebed Heaths Trust (Clinton Devon Estates), RSPB and Natural England were invited to the workshop due to their involvement in current management of the site.

The main aims of the workshop were to discuss current site management (including mitigation measures) and identify any challenges, present the emerging results of the desktop review, and fill data gaps. The findings of the workshop were used to inform the review of the site's use, management and functioning, as well as development of the long and short lists of mitigation options and Workshops 2 and 3.

During the workshop, the desktop information was presented to the site specialists and verified, with stakeholders such as the Pebblebed Heaths Trust clarifying some points on existing management practices and potential additional datasets (e.g., biodiversity audits) that could feed into the analysis of the site. There was also discussion from Natural England on the importance of a thorough in-combination assessment and they raised the development of a Protected Site Strategy[18] in the South West for which they are aiming to determine air quality mitigation measures. This discussion highlighted that Natural England would prefer that any mitigation options developed are bespoke for the EDLP and specifically, the increase in road transport emissions resulting from the plan's development.

[18] Protected Site Strategies – Problems Shared, Natural England Blog, June 2025, https://naturalengland.blog.gov.uk/2025/06/16/protected-site-strategies-problems-shared/

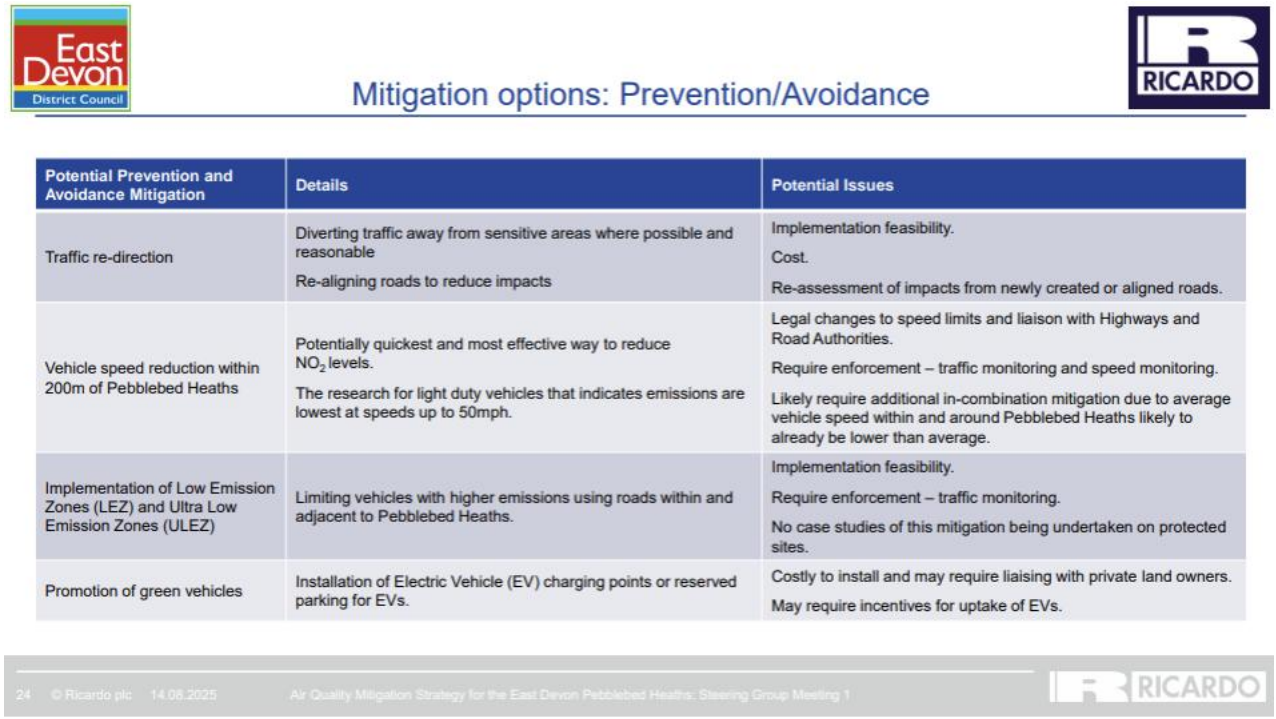
4.2.2 Steering Group Meeting 1

This workshop was held on Thursday 14th August 14:00-16:00 online via Teams, with the full Steering Group in attendance.

The aims of the workshop were to introduce the Steering Group members to one another, present the results of the desktop review and air quality modelling study, and discuss an initial long list of potential options for the mitigation of air quality impacts. The outcomes of this workshop were used develop/refine the long and short lists of mitigation options, and to inform the second Steering Group Meeting.

During the meeting, following presentations on the project background, desktop review and air quality model results, the initial list of mitigation options were presented within four categories and discussed in more detail (an example slide is shown below).

Figure 4-2 Example slide presenting a selection of mitigation options discussed as part of the 'initial long list'



Potential Prevention and Avoidance Mitigation	Details	Potential Issues
Traffic re-direction	Diverting traffic away from sensitive areas where possible and reasonable Re-aligning roads to reduce impacts	Implementation feasibility. Cost. Re-assessment of impacts from newly created or aligned roads.
Vehicle speed reduction within 200m of Pebblebed Heaths	Potentially quickest and most effective way to reduce NO_2 levels. The research for light duty vehicles that indicates emissions are lowest at speeds up to 50mph.	Legal changes to speed limits and liaison with Highways and Road Authorities. Require enforcement – traffic monitoring and speed monitoring. Likely require additional in-combination mitigation due to average vehicle speed within and around Pebblebed Heaths likely to already be lower than average.
Implementation of Low Emission Zones (LEZ) and Ultra Low Emission Zones (ULEZ)	Limiting vehicles with higher emissions using roads within and adjacent to Pebblebed Heaths.	Implementation feasibility. Require enforcement – traffic monitoring. No case studies of this mitigation being undertaken on protected sites.
Promotion of green vehicles	Installation of Electric Vehicle (EV) charging points or reserved parking for EVs.	Costly to install and may require liaising with private land owners. May require incentives for uptake of EVs.

The discussion of potential mitigation options centred around the feasibility of mitigation measures, as well as their likely impact on air pollution emissions (relating back to the mitigation hierarchy) and the ability to pass the integrity test. Stakeholders were also invited to share any other ideas for mitigation options in addition to those on the initial long list.

The key discussion points included:

- Any mitigation measures that do not fall within the 'prevention / avoidance' stage of the mitigation hierarchy cannot really be considered as mitigation for HRA. They should only be explored once all possible prevention / avoidance measures have been considered / implemented / ruled out with reasoning.
- Mitigation options need to be evaluated in terms of certainty.
- Some of the mitigation options were considered infeasible in the context of East Devon District and the EDPH. For example, traffic redirection and LEZ/ULEZ.
- Other actions raised by stakeholders that were not on the initial long list included improving public transport provision, and consideration of car park charging (as car parks are currently free).

Following Steering Group Meeting 1, the feedback provided during and after the meeting (including the points above) was considered and the initial long list of mitigation options was refined into a long list of seven options for further assessment.

An explanation of the mitigation hierarchy and the initial long list of mitigation options is presented below.

4.2.2.1 Initial long list of mitigation options

The Institute of Air Quality Management (IAQM) has set out a Position Statement on the mitigation of air quality impacts from development. It states that "*the appropriate mitigation solution for the operational air quality impact of any given individual general development scheme should be principle-led rather than specified by detailed prescription"*[19]. To reflect this approach, the David Tyldesley & Associates (DTA) 'mitigation hierarchy[20]' was followed to develop a mitigation scheme. The first step in the hierarchy is the avoidance of adverse impacts; then cancellation (or neutralisation) of effects, then to reduce impacts that cannot be avoided; and lastly compensate for any unavoidable impacts[21]. The mitigation hierarchy is detailed in Table 4-1 and is intended to ensure that the mitigation scheme is able to be sufficiently tested during Stages 2 to 4 of the HRA.

Table 4-1 Mitigation hierarchy

Mitigation stage	Description	Example
1. Prevention / avoidance	**Stop or prevent effects from occurring.**	**Re-locate developments outside the Zone of Influence.**
2. Cancellation	**Neutralise or fully negate the adverse nature of effects.**	**Allocate a rest period where recreation is prohibited at sensitive areas of a designated site.**
3. Reduction	**Reduce the amount of, degree size, or likelihood of effects.**	**Implement the use of barriers to reduce the likelihood of pollutants reaching sensitive habitats.**
4. Compensation[22]	**Offset the integrity of a designated site if effects cannot be fully reduced by the above three measures.**	**Habitat enhancement or creation of sensitive habitats outside the designated site boundary.**

A total of 18 potential mitigation options were included in the initial long list. Further detail regarding the long list mitigation methodology, the evidence base, and the mitigation measures themselves can be found in the Ricardo 2025 "*Long List Mitigation Summary"* Report.

The mitigation measures considered in the long list report are as follows:

- Traffic re-direction
- Speed reduction
- Low Emission Zones and Ultra Low Emission Zones
- Provisions of alternative recreational sites
- Advertisement of additional recreational sites
- In the inclusion of air pollution specific planning conditions in the planning process
- Promotion of green vehicles
- Providing additional road signage
- Temporary site closures
- Covering slurry tanks
- Increased land management at the designated sites
- Air quality barriers/screens

[19] IAQM Position Statement: Mitigation of Development Air Quality Impacts, Version 1.1, IAQM, June 2018. *Available at: https://iaqm.co.uk/text/position_statements/mitigation_of_development.pdf*

[20] Tyldesley, D., and Chapman C. (2013) The Habitat regulations Assessment Handbook: Chapter 5:4. Mitigation measures and the use of conditions – Defining mitigation and compensatory measures.

[21] Tyldesley, D., and Chapman C. (2013) The Habitat regulations Assessment Handbook: Chapter 5:4. Mitigation measures and the use of conditions – Defining mitigation and compensatory measures.

[22] Compensation should not be used as a mitigation option during stage 2 Appropriate Assessment. Compensation can only be explored where all other mitigation options re not sufficient to mitigation all adverse effects. Compensation must be agreed during stages 3 and 4 of the HRA process.

- Local Plan policy alteration
- Alteration of Local Plan allocations
- Offsite habitat creation[23]
- Removal of pollutants from other sources
- Site enhancement
- Monitoring of adverse effects[24]

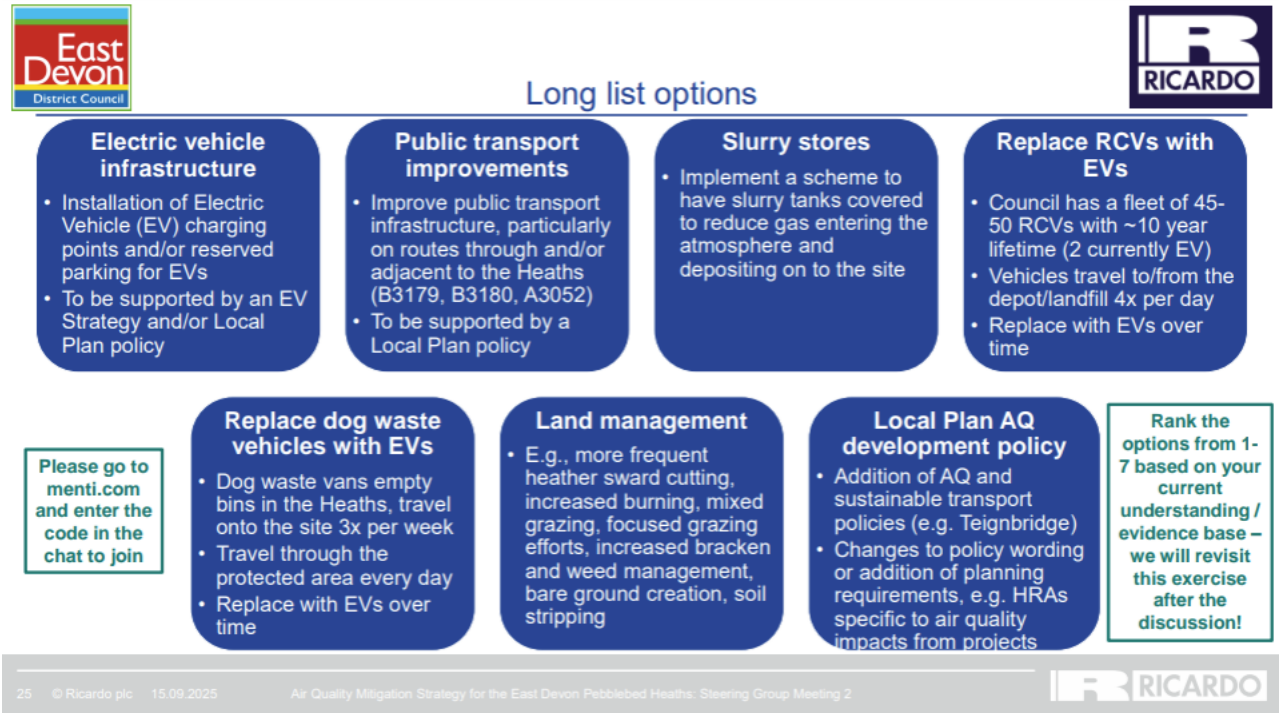
4.2.3 Steering Group Meeting 2

This workshop was held on Monday 15th September 14:00-16:00 in person at East Devon District Council's offices in Honiton, with a hybrid option online via Teams.

During the meeting, following presentations recapping the project background, desktop review, air quality assessment and discussion in Steering Group Meeting 1, further discussion was undertaken on each long list mitigation option with the aim of refining both the number of options to be taken forward in the mitigation strategy, and better defining the options themselves.

Prior to discussing the mitigation options in detail, the stakeholders were presented with an overview of the measures and asked to provide an initial ranking of the options using Mentimeter. At the end of the workshop, after the detailed discussion, participants were asked to repeat the ranking exercise to see whether opinions had changed. The results of the rankings are provided in Figure 4-6 alongside the multi-criteria analysis results also undertaken before and after the discussion.

Figure 4-3 Overview of the long list of mitigation options as provided during Steering Group Meeting 2



A multi-criteria analysis (MCA) was undertaken on the long list of mitigation options, to help identify the proposed short list of mitigation options. The draft MCA scoring, carried out by the project team, was circulated prior to Steering Group Meeting 2, and is summarised in Figure 4-4.

The criteria against which the long list options were assessed were as follows:

[23] Compensation is not a mitigation method that is applicable at Stage 2 Appropriate Assessment. This measure must go through all relevant derogation tests.

[24] Monitoring is not a suitable method of mitigation but can be used as an early warning system to determine the success of mitigation or alert the competent authority if additional mitigation measures are required.

Accuracy of assumptions — Level of detail and accuracy in the assumptions are major factors in the robustness of the estimation of air quality impacts for the options

1 = general/high level assumptions, 5 = assumptions based on strong (local) evidence

Impact on emissions — Considers the expected level of impact on air pollution emissions, based on available evidence

1 = low impact, 5 = high impact

Potential co-benefits — Can include GHG/climate, reduction in congestion, noise, health benefits, improved travel options, etc.

1 = low potential/no. of co-benefits, 5 = high potential/no. of co-benefits

Burden on residents — Could include financial impact, restrictions (e.g., on parking or travel options), complicated rules, etc.

1 = heavy burden, 5 = light burden

Burden on businesses — Could include restrictions, complicated rules, other factors affecting business operations, etc.

1 = heavy burden, 5 = light burden

Implementation costs — Considers the expected cost for the Council to implement, and likelihood of funding

1 = high cost, 5 = low cost

Ease of implementation — Considers practicality of implementation, skills required, and timeline for implementation

1 = difficult to implement, 5 = easier to implement

Political acceptance — Considers whether there is a risk to reputation, and how politically acceptable the option is

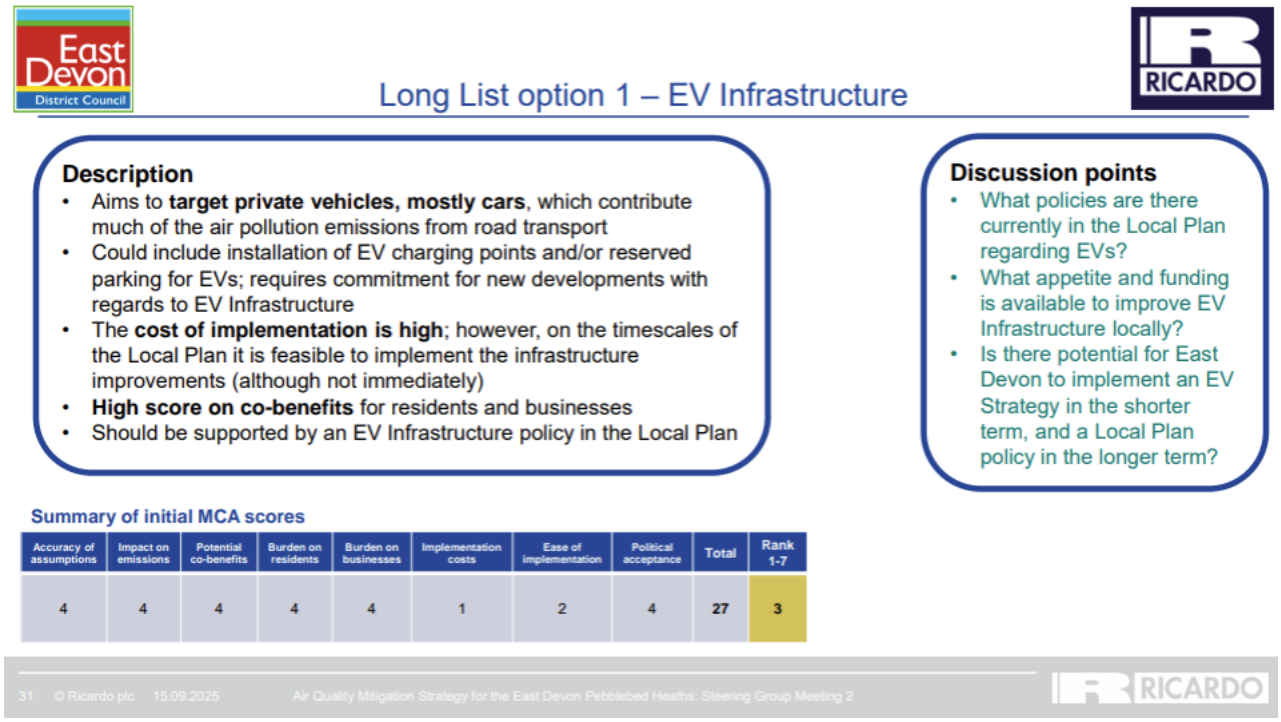
1 = low political acceptability, 5 = high political acceptability

Figure 4-4 Initial MCA scoring for the long list of mitigation options, carried out by the project team prior to Steering Group Meeting 2

Option	Accuracy of assumptions	Impact on emissions	Potential co-benefits	Burden on residents	Burden on businesses	Implementation costs	Ease of implementation	Political acceptance	Total	Rank 1-7
Electric Vehicle Infrastructure	4	4	4	4	4	1	2	4	27	3
Public transport infrastructure improvements	2	3	4	4	5	2	3	4	27	3
Slurry stores	4	4	2	5	5	2	2	5	29	1
Replace Refuse Collection Vehicles with e-vehicles	3	2	2	4	4	3	3	4	25	7
Replace dog waste vehicles with e-vehicles	3	2	2	5	5	3	3	5	28	2
Land management	3	2	2	4	5	3	3	4	26	6
Local Plan Air Quality Development policy	3	5	3	4	4	3	2	3	27	3

For each of the seven long list measures, a facilitated discussion was undertaken to further define the measures, where possible, and consider the feasibility in more detail. An example of the slides used to facilitate the discussion is provided below. Alongside the discussion, the project team noted feedback and updated the MCA scoring accordingly in the background.

Figure 4-5 Example slide used to facilitate discussion on one of the long list mitigation options



Following discussion of all seven long list mitigation options, the MCA scores were updated and collated alongside the initial MCA scoring and the Mentimeter rankings before and after the discussion, as presented in Figure 4-6. Within the individual MCA criteria scores, red indicates a score was lowered during the discussion, and green indicates a score was raised during the discussion, thereby taking the stakeholder feedback into account.

Figure 4-6 shows that the MCA scores and rankings remained mixed before and after the discussion (although it should be noted that, overall, the MCA scores were very similar and so their ranking is not definitive). Slurry stores consistently ranked highest for the MCA scores and were ranked third via Mentimeter. The options targeting RCVs and dog waste vehicles, as well as land management, were ranked lower in the Mentimeter scoring but the latter two scored higher via the MCA. Local Plan Air Quality Development Policy scored relatively highly across both the Mentimeter and MCA scorings, and EV and Public Transport Infrastructure improvements both ranked relatively highly via Mentimeter, but lower on the MCA scoring (partly due to the cost and ease of implementation scores). The key feedback raised regarding each long list option is summarised in Table 4-2.

In summary, the Mentimeter and MCA ranking exercises, while useful to facilitate discussion around the mitigation options, did not provide a definitive answer as to which mitigation options are most suitable to mitigate air quality impacts on the EDPH. This reflects the complex nature of the situation and the difficulty in selecting air quality mitigation options which we can be confident would solve the problem, whilst also being feasible to implement.

Figure 4-6 Final MCA scoring and Mentimeter rankings for the long list of mitigation options, carried out by the Steering Group during Meeting 2

Option	Accuracy of assumptions	Impact on emissions	Potential co-benefits	Burden on residents	Burden on businesses	Implementation costs	Ease of implementation	Political acceptance	Total	Final MCA ranking	Initial MCA ranking	Initial Menti ranking	Final Menti ranking
Electric Vehicle Infrastructure	4	4	4	4	4	1	1	4	26	5	3	4	2
Public transport infrastructure improvements	2	2	4	4	5	2	3	4	26	5	3	1	4
Slurry stores	4	4	2	5	5	2	1	5	28	1	1	3	3
Replace Refuse Collection Vehicles with e-vehicles	3	2	2	4	4	3	2	4	24	7	7	5	5
Replace dog waste vehicles with e-vehicles	3	2	2	5	5	3	2	5	27	2	2	7	7
Land management	3	2	2	4	5	3	4	4	27	2	6	6	6
Local Plan Air Quality Development policy	3	5	3	4	4	3	2	3	27	2	3	2	1

Barriers/screens were another mitigation option discussed during the workshop. This measure was included in the initial long list of mitigation options but not taken forward to the refined long list. The general feedback in the workshop was that screens, whether natural (e.g., trees/bushes) or artificial, were not appropriate for the habitat site, primarily because the roads causing the problem run directly through the site. Therefore, there is no way to install such screens without damaging the site itself.

Following the conclusions of the options discussion in Steering Group Meeting 2, feedback was requested from Natural England on whether there were any mitigation options they could identify that had been missed during the mitigation options development process (noting that stakeholders had been offered multiple opportunities to suggest additional ideas for mitigation options throughout the engagement workshops and in-between workshops). Natural England confirmed that they had considered both online and offline, whether there were any other mitigation options that could practically be implemented and their impact on emissions quantified, and that they had not been able to identify any other mitigation options.

4.2.3.1 Refined long list of mitigation options

After Steering Group Workshop 1, the initial brainstorm of mitigation options were refined to a long list of seven options to undergo a Multi-Criteria Analysis (MCA) exercise. Some mitigation options present in the initial long list were not explored initially, but were included in the refined long list after discussions with stakeholders. These measures were:

- Public Transport Improvements
- Replacing refuse collection vehicles (RCVs) with electric vehicles (EVs)
- Replacing dog waste vehicles with EVs

The long list mitigation options were presented to stakeholders during the Steering Group Meeting 2. The final long list of mitigation options is presented in Table 4-2 below, including a summary of the feedback obtained at Steering Group Meeting 2, and available cost information.

Table 4-2 Long list of air quality mitigation options

Mitigation Option	Details	Information available on cost	Summary of feedback from Steering Group Meeting 2
Electric Vehicle infrastructure	Installation of Electric Vehicle (EV) charging points and/or reserved parking for EVs. To be supported by an EV Strategy and/or Local Plan policy.	Indicative capital and operating costs for EV charge points range from (lower limit) £1,000 for a Standard/Fast Off-Street charge point, up to (higher limit) around £170,000 for an Ultra Rapid charge point[25]. However, significant variability in grid connection costs are expected (e.g., subject to local conditions, distance of the connection and whether any upgrades are required). The Devon County Council EV Charging Strategy estimated that East Devon would require 345 fast and 17 rapid chargers to be installed by the public sector by 2030[26] (in addition to chargers installed by the private sector). The estimated cost for this may be in the region of £5 million for that number of fast chargers and £1.5 million for the rapid chargers.	The cost of implementation is high; however, on the timescales of the Local Plan it is feasible to implement the infrastructure improvements (although not immediately). High score on co-benefits. Concerns around where charging points could be located (not in/near the EDPH) and whether providing infrastructure would actually result in uptake by members of the public.
Public transport improvements	Improve public transport infrastructure, particularly on routes through and/or adjacent to the Heaths (B3179, B3180, A3052). To be supported by a Local Plan policy.	It is not possible to estimate the costs associated with public transport infrastructure improvements at this stage, as the mitigation option is not well-defined. In addition, it is very unlikely that this option will be taken forward as a mitigation measure for air quality improvement based on stakeholder feedback.	Ease of implementation is moderate as this is not straight forward. The cost of implementation is relatively high; however, would expect this to focus on changing the services available, rather than purchasing a fleet of new buses. High score on co-benefits. Concerns around whether the improvements would actually result in increased uptake – local insight thinks it unlikely.
Slurry stores	Implement a scheme to have slurry tanks covered to reduce gas entering the	There are a number of types of slurry store cover; impermeable covers include[27]:	Does not mitigate the emissions from road transport. Although this option is expected to perform well in terms of emissions reduction

[25] Table 7: Indicative capital and operating cost ranges for EVCPs by location type, Electric Vehicle Charging Strategy, Devon County Council / WSP, January 2024. https://democracy.devon.gov.uk/documents/s47564/Devon%20Electric%20Vehicle%20Charging%20Strategy%20-%20Final%20with%20appendix.pdf

[26] Table 11: Mid-range forecast, EVCPs requiring public sector intervention, by area, Electric Vehicle Charging Strategy, Devon County Council / WSP, January 2024. https://democracy.devon.gov.uk/documents/s47564/Devon%20Electric%20Vehicle%20Charging%20Strategy%20-%20Final%20with%20appendix.pdf

[27] Benefits of covering slurry stores, Agriculture and Horticulture Development Board, https://ahdb.org.uk/knowledge-library/benefits-of-covering-slurry-stores (accessed October 2025).

Mitigation Option	Details	Information available on cost	Summary of feedback from Steering Group Meeting 2
	atmosphere and depositing on to the site.	• For lagoons – fixed floating plastic membrane: moderate to high cost • For tanks – free-floating plastic cover: low to moderate cost • For tanks – fixed cover: high cost • Integral store and cover (bag): moderate cost There are grant contributions available from the UK Government, e.g., Round 2 of the Slurry Infrastructure Grant[28] and there is potential for additional funding to be sought from a pool contributed to by developers. In 2023, the National Farmers' Union indicated that grants for a self-supporting slurry store were available at £26.50 per square metre. For a typical store size of 100 square metres, this would correspond to approximately £3,000 per store.[29]	and accuracy of assumptions it will require landowners to agree to covering slurry tanks alongside identifying uncovered slurry tanks in closer proximity to EDPH. This option would need further work to define where slurry stores are and if they are already covered. Concerns on cost, accessing grants and uptake.
Replace RCVs with EVs	The Council has a fleet of 45-50 RCVs with ~10 year lifetime (2 currently EV). Vehicles travel to/from the depot/landfill 4x per day. Replace with EVs over time; 25 are due for replacement during 2026/27.	According to East Devon District Council, an EV RCV costs approximately £480,000; a diesel RCV costs approximately £185,000[30]. These costs would fall on the Council, with the potential to recoup some costs, e.g., via Council Tax, Community Infrastructure Levy (CIL), and developer contributions.	Only affect a small proportion of the vehicle fleet, but HGVs are highly polluting. On the timescale of the LP there is scope to replace a significant proportion of the fleets, over time (as lifetime ~10 years). Cost is a major factor. It would be hard, though not impossible, to guarantee the new RCVs are the ones travelling through the site. Issue of EV infrastructure for such vehicles.
Replace dog waste vehicles with EVs	Dog waste vans empty bins in the Heaths, travel onto the site 3x per week. Travel through the protected area every day.	According to East Devon District Council, these are "transit-style" vans. As of October 2025, a new Ford E-Transit can be purchased from around £45,000[31]. These costs would fall on the Council, with the potential to recoup some costs, e.g., via Council Tax Community Infrastructure Levy (CIL), and developer contributions..	Only affect a small proportion of the vehicle fleet, but the vans travel through the site itself. Issue of EV infrastructure for such vehicles. Unlikely to make a big difference to air quality concentrations.

[28] Item specification and grant contribution in round 2 of the Slurry Infrastructure grant, Rural Payments Agency, UK Government, updated July 2025, https://www.gov.uk/government/publications/slurry-infrastructure-grant-round-2-applicant-guidance/item-specification-and-grant-contribution

[29] https://www.nfuonline.com/updates-and-information/cut-costs-and-protect-the-environment-with-a-slurry-store-cover/

[30] Information provided during a teleconference with East Devon District Council, 5th September 2025.

[31] Ford E-Transit Custom, https://www.ford.co.uk/vans-and-pickups/e-transit-custom#intro (accessed October 2025).

Mitigation Option	Details	Information available on cost	Summary of feedback from Steering Group Meeting 2
	Replace with EVs over time.		
Land management	E.g., more frequent heather sward cutting, increased burning, mixed grazing, focused grazing efforts, increased bracken and weed management, bare ground creation, soil stripping.	It is not possible to estimate the costs associated with land management at this stage; further definition as to the exact management to be delivered, scope and frequency is required. This will need to be discussed and decided upon with the relevant stakeholders, for example Clinton Devon Estates and RSPB. For context, the National Audit Office estimated in 2008 that the cost of managing SSSIs in England between 2000 and 2008 was approximately £50 per hectare per year.[32] This may give a starting point for estimating potential costs of more intensive management. The costs for this mitigation option could be funded by Community Infrastructure Levy (CIL), and developer contributions.	Provides resilience to site degradation. Can be used to mitigate the effects of traffic pollution, although this measure would not remove transport emissions. Ease of implementation is lower as it would involve multiple land managers adjusting management types.
Local Plan Air Quality Development policy	Addition of AQ and sustainable transport policies (e.g. Teignbridge). Changes to policy wording addition of planning requirements, e.g. HRA specific to air quality impacts from projects.	It is not possible to estimate the costs associated with Local Plan Air Quality Development policy at this stage. However, it would be expected that the bulk of the costs for implementation of any conditions would fall on the developer. The Council would be required to invest the time to develop and enforce the policies, as well as engaging with the developer.	Difficult to assess at this stage, but scores lower on ease of implementation due to resources required to agree new planning policies. Scores high for impact on air pollution emissions as policy measures can be directly relevant to AQ impacts on Pebblebed Heaths, for example ensuring no project-level development goes ahead unless LSEs are ruled out (but needs better definition).

[32] https://www.nao.org.uk/reports/natural-englands-role-in-improving-sites-of-special-scientific-interest/

4.3 SHORTLISTING MITIGATION OPTIONS

The aim of the mitigation options development exercise was to refine all potential mitigation options to a short list of mitigation measures that would mitigate the quantified air quality impacts arising from increased road traffic as a result of the EDLP.

4.3.1 Short list of mitigation options that could be considered for further development and testing

The following mitigation options could be further refined to confirm practicality, and air dispersion modelling carried out to estimate their impact on the PC of the EDLP.

1. Electric Vehicle infrastructure – this mitigation option would need to further be developed into an actionable and committed plan (for example, an EV Strategy for East Devon District) and be supported by a Local Plan policy. From this, assumptions could be made regarding EV uptake and applied to the air quality model.

   Potential benefit: currently, approximately 5% of vehicles on the UK's roads are electric vehicles.[33] it is already known that an increasing proportion of vehicles will comprise EVs in future years, with the number of EVs expected to increase by a factor of five or more by 2030.[34] This leaves significant opportunity to reduce the impact of new development from this "business as usual" baseline. Reducing the proportion of ICE vehicles in vehicles used by residents of a new development in East Devon in 2030 from around 50% to around 10% of vehicle movements would result in a reduction in the air quality impact of the development at the SAC/SPA by approximately 80%.

2. Slurry stores – this mitigation option would need to be further investigated (i.e., suitable sites identified) and an actionable and committed plan developed. From this, assumptions regarding uptake and estimations as to the air pollution reduction could be made.

   Potential benefit: fitting a fixed impermeable cover on a slurry store results in a reduction in ammonia emissions of approximately 80%.[35] This can result in a significant reduction in ammonia levels, acid deposition and nitrogen deposition in the area surrounding the slurry store. Preliminary work carried out by Ricardo indicates that this may have a benefit in offsetting road vehicle ammonia emissions in the area within 1-2 km of a slurry store. This means that a network of slurry store improvements may be needed to secure benefits across the full area requiring mitigation described in Section 3.3.1.5. It would be necessary to identify and engage support from a number of farmers in order to successfully implement this mitigation measures. If this can be done, slurry store improvements would represent a potentially viable mitigation solution.

3. Replacing refuse collection vehicles (RCVs) with electric vehicles (EVs)

   Potential benefit: The Council operates a fleet of 45 to 50 RCVs. These travel through the SAC/SPA on most days of the week, transiting through the SAC/SPA area four times each day. Additionally, a smaller number of vehicles carry out refuse collections within the SAC/SPA itself. The lifetime of RCVs is typically ten years. The Council is currently trialling the use of electric recycling vehicles via two EV RCVs. Procuring electric RCVs in place of diesel-powered vehicles would result in an additional cost of approximately £300,000 per vehicle at 2025 prices. It may not be practicable to replace the entire fleet due to limitations on the electricity supply at the vehicle depot. However, if these difficulties could be overcome, potentially up to 200 heavy duty vehicle movements per day could be offset by funding replacement of diesel RCVs with electric vehicles. This would have a capital cost for purchase of electric RCVs of the order of £15 million over a 10 year period. If partly or fully deliverable under the EDLP, this could offset a significant proportion of the passenger vehicle movements forecast to arise from implementation of the plan.

4. Replacing dog waste vehicles with EVs

   Potential benefit: A fleet of vans is used to empty dog waste bins. These vehicles travel into and around the SAC/SPA three times per week, and travel through the SAC/SPA every day. Replacing these with electric vehicles would directly offset the impacts of the proposed development plan to a relatively

[33] https://www.rac.co.uk/drive/electric-cars/choosing/road-to-electric/

[34] https://www.local.gov.uk/electric-vehicles-whats-going-out-there

[35] CEH for Defra, "*Analysis of the impact to ammonia emissions of covers on slurry/digestate stores near nitrogen-sensitive protected habitats in England*", December 2021 https://nora.nerc.ac.uk/id/eprint/531497/

small extent – this could be estimated as offsetting the equivalent of approximately 10-20 car/van movements per day. This could be part of a mitigation plan for the EDLP.

5. Land management

   Potential benefit: More intensive land management in the areas affected by the proposed development plan can be an effective means of offsetting impacts due to increased nitrogen deposition. Nitrogen deposition tends to result in an increase in non-specialist species, and consequently a reduction in biodiversity as species which have adapted to thrive in the habitats which exist in the Pebblebed Heaths are crowded out. Physical removal of these species can ensure that the characteristic species of the SAC/SPA are able to thrive. Other measures such as management of water levels can also be effective in enabling protected species and habitats to improve.

6. Local Plan Air Quality Development policy

   A policy may be required to secure funding for mitigation measures to be implemented under the EDLP. This could be achieved through a levy linked to property numbers and/or forecast impact on the East Devon Pebblebed Heaths.

   A policy should be included in the Local Plan which requires all developers to carry out a screening assessment and (if required) an impact assessment in accordance with the Habitats Regulations to determine the impact of their development. Developers could potentially then have the option of either contributing to the funding of centrally managed mitigation measures, or designing and implementing their own project-level mitigation measures, provided these comply with the relevant requirements of HRA. Teignbridge Council has included this policy wording: "*Development that is likely to have a significant effect on a European Wildlife Site with respect to air quality, will not be permitted unless an Appropriate Assessment has ascertained that following mitigation there is no adverse effect on the integrity of the site.*" This policy could also encourage developers to consider potential impacts on the SAC/SPA at an early stage in their scheme design, ensuring that potential impacts and mitigation requirements can be minimised. The Teignbridge plan includes specific provisions in relation to agricultural development in this regard.

4.4 AMENDMENTS TO THE LOCAL PLAN

Based on the work carried out to date, it is possible that there may be no practicable options which would fully mitigate the impacts of the EDLP. This situation arises partially due to the unusually large contribution of the EDLP to air pollution at the SAC. This is because of the location of the European site centrally within the Council area, and the sensitivity of the European site to air pollution impacts.

5. CONCLUSIONS AND RECOMMENDATIONS

The aim of this report was to assess the potential air quality impacts of the East Devon Local Plan (EDLP) on the East Devon Pebblebed Heaths SAC and Devon Heaths SPA, and to outline mitigation strategies that will reduce effects from the Local Plan such that no adverse effect on the integrity of the SAC and SPA can be concluded.

Through consultation with stakeholders it has become clear that several mitigation options originally put forward are unlikely to be feasible in the local context, as described in Section 4.2.

Conclusion 1: During the assessment process we have determined that both East Devon Pebblebed Heaths SAC and East Devon Heaths SPA in their entirety have been screened out for airborne NOx due to forecasted concentrations resulting from the Local Plan being below the CL for both sites.

Conclusion 2: Two qualifying features for the SAC have been screened out for all pollutants as they are located outside of the modelled area of exceedance and therefore there will be no effect:

- Wet Atlantic heaths with *Erica tetralix*
- Southern damselfly

Conclusion 3: Several SSSI Units associated with the SAC and SPA have been screened out in their entirety for all pollutants due to distance from the key road links. These comprise Unit 002, 005, 012, 017, and 018. All qualifying features included in these Units have also been screened out from further assessment.

Conclusion 4: It was not possible to screen out a Likely Significant Effect for other units within the EDPH SAC and SPA. This is consistent with the findings of the Appropriate Assessment prepared for the emerging East Devon Local Plan[36].

Recommendation 1: It is recommended that further work be conducted in regard to traffic and emissions modelling to enable mitigation to be specified in more detail, and the appropriate assessment to be completed. This includes:

- Further development and refinement of strategic mitigation options for testing
    - EV Strategy / similar
    - Slurry stores
    - Land management
    - Implementation of electric Refuse Collection Vehicles across a proportion of the fleet to be deployed on routes crossing the EDPH.
    - Amended development policies
- Sensitivity testing to estimate the proportion of EDLP traffic that would need to be removed from the LP scenario in order to rule out LSE (i.e., to be below the 1% threshold of the minimum CLs for NH3, Ndep and Adep, or otherwise rule out LSE based on wider considerations)
- Review of species and habitat data for the areas where exceedances of the 1% screening threshold or LSE are forecast to occur, or completion of surveys if data is not available.

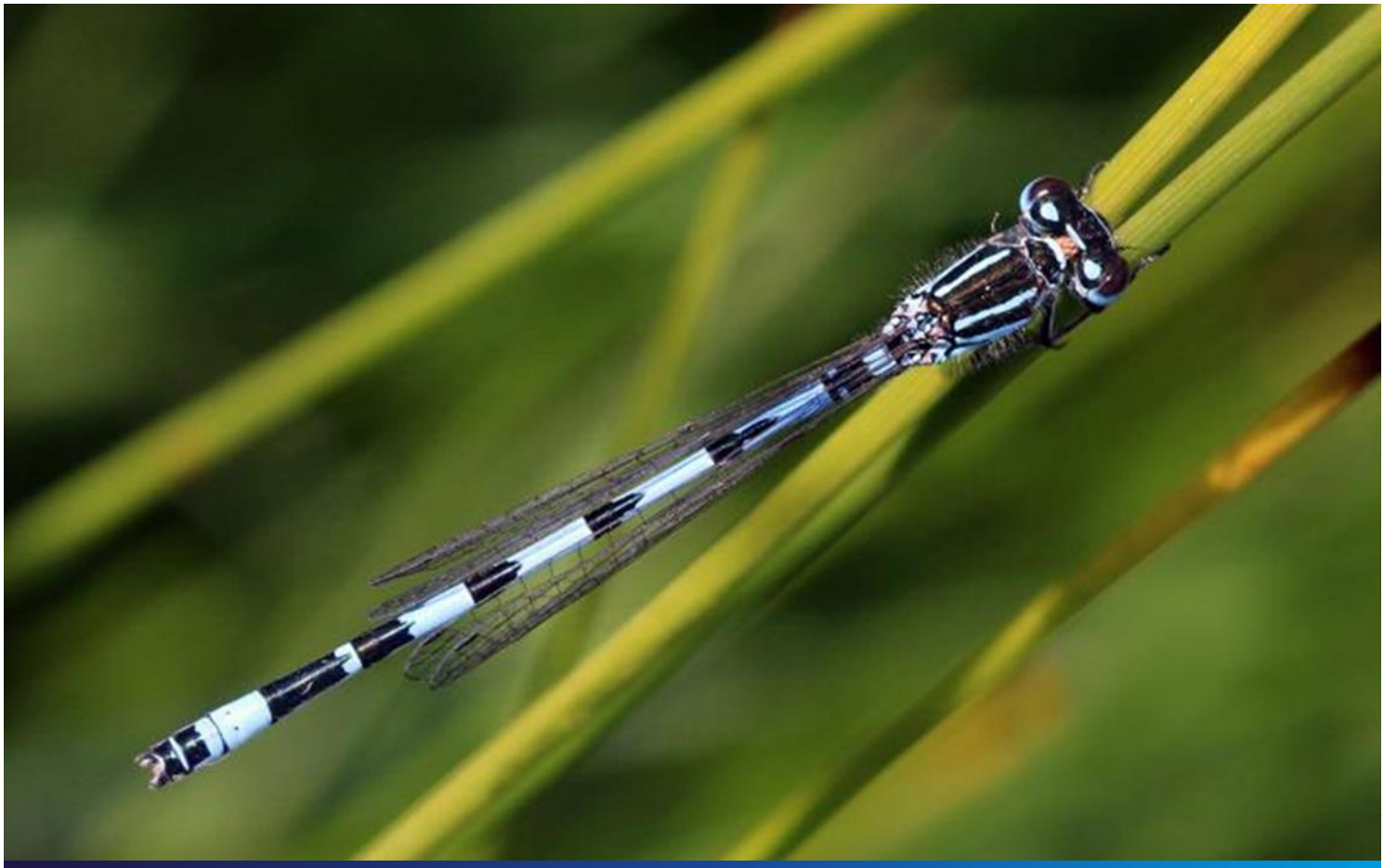
Conclusion 5: A range of mitigation measures are available at a strategic level as set out under Recommendation 1. We can be confident that these would reduce impacts on site integrity, but at present there is not complete certainty on the effectiveness of the strategic mitigation options to determine if these would be sufficient to avoid effects such that no adverse effects to site integrity will occur for the remaining features of the SAC and the SPA.

Recommendation 2: It is recommended that more detailed mitigation measure design and sensitivity testing should be carried out to determine whether the measures outlined above could be designed to be sufficient to avoid all Likely Significant Effects on the integrity of the EDPH SAC and SPA. If so, the EDLP should be updated to require and enable such measures to be integrated into the plan at a strategic level. For example, developers could be required to pay a levy per property to enable the Council to progressively implement strategic mitigation measures.

Recommendation 3: A principle of HRA is that a proposed plan or project must meet the requirements of the Habitats Regulations. Any identified impact on the integrity of a European site must be mitigated. Developers bringing forward schemes under the EDLP should be required to carry out a project-level Habitats Regulations Assessment to demonstrate the expected scale of impacts on the EDPH SAC and SPA. If mitigation of impacts is required, this should be deliverable on the basis of the plan-level mitigation plan developed for the EDLP. However, it would also be possible to allow for developers to develop alternative mitigation solutions which could be checked and (provided they are effective) implemented instead of the plan-level mitigation. If a developer is able to fully mitigate any increase in air pollution impacts at the habitat sites, this could be a means of waiving a requirement to contribute to strategic-level mitigation under Recommendation 2.

Recommendation 4: In the event that, following completion of Recommendation 2, the identified mitigation measures are found not to fully address the effects of the EDLP resulting in a residual adverse effect to integrity, the Local Plan will need to be amended to eliminate this residual adverse effect.

[36] Liley, D., Rush, E. Cork, C. & Chapman, C. (2025). Habitats Regulations Assessment of the East Devon Local Plan 202 to 2040 (Regulation 19 Draft Plan). At https://eastdevon.gov.uk/media/ya3hdlaq/csd-006-se-devon-local-plan-hra-reg-19-300125.pdf. Accessed October 2025



MITIGATION OF AIR QUALITY IMPACTS FOR THE EAST DEVON PEBBLEBED HEATHS

Technical report

Report for: East Devon District Council

Ricardo ref. ED21793 Issue: 4.1 6 October 2025

Customer:
East Devon District Council

Customer reference:
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1. INTRODUCTION

1.1 EAST DEVON PEBBLEBED HEATHS

The district of East Devon is located in the county of Devon, and is adjacent to Dorset, Somerset, Mid Devon, and the city of Exeter. There are approximately 150,800 people[1] living in the district area of ~ 815 km^2. East Devon District Council (EDDC) is preparing a new local plan that will cover the period from 2020 through to 2042, which envisages the provision of approximately 21,000 new homes, as well as increased employment and commercial floorspace over the plan period[2]. The East Devon Local Plan (EDLP) has been developed in line with the Government's objectively assessed requirement for housing growth levels.

East Devon is characterised by its exceptional natural features, with over half of the district designated as National Landscape and a World Heritage Site coastline. It also contains numerous nature conservations areas of national and international importance. Increases in road traffic associated with the additional development in the EDLP may have the potential to adversely impact these nature conservation areas through increases in air concentrations of pollutants, particularly oxides of nitrogen and ammonia, and the deposition of these pollutants within sensitive habitats.

The Habitats Regulations Assessment (HRA) work undertaken to date has screened out the potential for adverse impacts at many of the internationally designated sites across the district; however, it has highlighted specific concerns relating to potential impacts on the East Devon Pebblebed Heaths (EDPH) Special Area of Conservation (SAC) and Special Protection Area (SPA).

A significant characteristic of EDPH is the diversity of heathland-associated plant and animal communities that reflect the varied topography, geology, hydrology and water chemistry of the area. It is designated as a SAC primarily due to its Annex 1 habitats of northern Atlantic wet heaths with *Erica tetralix*, its European dry heaths, and its Annex 2 species of the Coenagrion mercurial (Southern Damselfly). EDPH hosts important breeding birds such as the *Caprimulgus europaeus* (European Nightjar) and *Sylvia undata* (Dartford Warbler), which afford the site its SPA status.

1.2 THIS REPORT

This report contains the results of an updated Air Quality HRA of the impacts of road traffic emissions on the EDPH site, and HRA Stage 1 assessment of air quality impacts against screening thresholds. It forms part of the robust evidence base supporting EDDC with the emerging EDLP 2020-2042.

Air quality impacts on the designated site were assessed based on predicted annual average airborne concentrations of NOx and NH_3, together with annual deposition rates of nutrient nitrogen and acid. A sub-regional air dispersion model (RapidAIR) was used to model predicted air quality impacts at locations within the site at a resolution of 3m x 3m. Devon County Council (DCC) provided Annual Average Daily Traffic (AADT) and vehicle speed data for four roads, with supplementary data gathered from Department for Transport (DfT) count points. Supplementary traffic data was scaled using TEMPRO factors provided by DCC. Missing speed data was filled using adjacent link speeds or a national average speed based on road classification.

This information was used in three scenarios to determine the air quality impacts associated with the local plan allocations:

1. 2022 Base Year: This scenario was designed to replicate 2022 traffic conditions within the study area in order to verify the performance of the air dispersion model.
2. 2042 Future Base: This scenario assumed background traffic growth in line with DfT's TEMPRO software (v8.0). Additionally, it included all known current development and infrastructure, as well as all committed development and infrastructure, up to 2042. Development associated with the EDLP was excluded from this scenario. This was a hypothetical scenario against which to test the impacts

[1] East Devon District Council: Census 2021, accessed 22/07/2025: https://eastdevon.gov.uk/council-and-democracy/knowing-east-devon/census-2021/

[2] East Devon Emerging Local Plan 2020-42: Draft (February 2025)

of the EDLP, as it assumes there will be no development within the district up to 2042 other than at sites which already have planning permission.

3. 2042 Future Year with Local Plan: This scenario is equivalent to the '2042 Future Base' scenario, with the addition of development proposed in the EDLP. A comparison of both scenarios made it possible to assess any impacts attributable to the EDLP in isolation.

The contributions attributable to the local plan were compared to the screening threshold of 1% of the Critical Load or Critical Level applicable for each pollutant at the designated site. Likely Significant Effects (LSEs) can be discounted where the model results and analysis indicate that the contribution from the local plan, alone and in-combination with other applicable plans and projects, is below the 1% screening threshold.

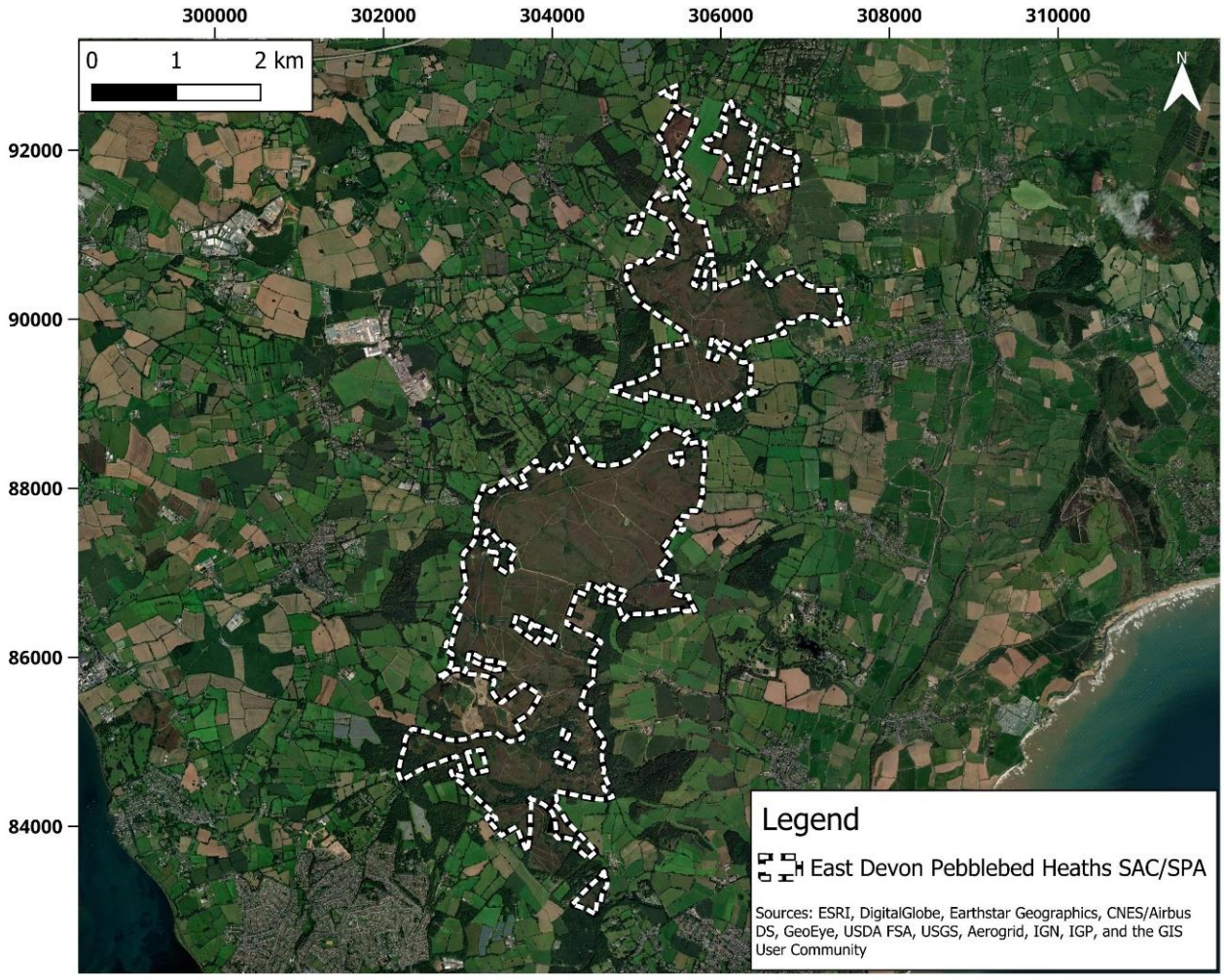
Where the screening analysis indicates that LSEs on the designated site cannot not be ruled out, it is recommended that further analysis be undertaken in the form of an HRA Stage 2 Appropriate Assessment. Where the Appropriate Assessment refines areas in which there could potentially be adverse effects related to air pollution, this will inform the development of a mitigation strategy.

2. HABITAT SITE INFORMATION

2.1 BACKGROUND INFORMATION AND QUALIFYING FEATURES

Figure 2-1 provides an overview of the location of the EDPH SAC and SPA.

Figure 2-1 Overview of EDPH SAC & SPA



2.1.1 East Devon Pebblebed Heaths SAC (UK0012602) and SPA (UK9010121)

The East Devon Pebblebed Heaths SAC is the largest block of lowland heath in Devon. The site includes dry and wet heath associated with various mire communities.

The site is designated for the following habitats listed in Annex I:

- European dry heaths
- North Atlantic wet heaths with *Erica tetralix* (wet heathland with cross-leaved heath)

The site is designated for the following species listed in Annex II:

- Southern damselfly *Coenagrion mercurial*

The site has also been granted SPA designation as it hosts at least 1% of the Great Britain population of two species listed in Annex I of the Birds Directive (79/409/EEC) including the European Nightjar *Caprimulgus europaeus* (Breeding) and Dartford warbler *Sylvia undata* (breeding). In particular, the site supports approximately 6.8% of the breeding Dartford Warbler population and 2.4% of the breeding Nightjar population in Great Britain[3].

Several pressures have been listed for the SAC and SPA in the Site Improvement Plan (SIP)[4]. These include:

- Inappropriate scrub control
- Under-grazing
- Changes in land management
- Public access and disturbance
- Air pollution – atmospheric nitrogen deposition
- Water pollution – nutrient enrichment
- Hydrological changes

2.1.2 East Devon Pebblebed Heaths SSSI (1004364)

The site is underpinned by the East Devon Pebblebed Heaths Site of Special Scientific Interest (SSSI) national designation. EDPH is the largest block of lowland heath in Devon and is considered a nationally important representative of the inland Atlantic-climate, lowland heathlands of Britain and north-west Europe. A significant feature of the site is the diversity of heathland associated communities, related to its large area and the range of substrate and topography. The wide range of birds and invertebrates is also an important characteristic supporting its SSSI status.

There are 16 units within the SSSI, all of which have been categorised as dwarf shrub heath lowland. Of the 16 units:

- Three are in ‘favourable’ condition: units 005, 007, 010;
- Three are in ‘unfavourable - no change’ condition: units 006, 014, 016;
- Eight are in ‘unfavourable - recovering’ condition: units 001, 002, 008, 009, 012, 015, 017, 018; and
- Two are in ‘unfavourable - declining’ condition: units 011, 013).

A “Restore” target has been put in place relating to the site supporting processes Conservation Objective. The target states “*Restore as necessary, the concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values given for this feature of the site on the Air Pollution Information System[3].”*

[3] Natural England (2019) Supplementary advice on conserving and restoring site features. Available at: https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK9010121.pdf

[4] Natural England (2014) Site Improvement Plan for the East Devon Pebblebed Heaths SAC and East Devon Heaths SPA. Available at: https://publications.naturalengland.org.uk/publication/6234004760035328

2.2 SCREENING THRESHOLDS

Table 2-1 summarizes all of the critical loads for nutrient nitrogen deposition (kgN/ha-year) and acid deposition (kEq/ha-year), as well as the critical levels for airborne ammonia (µg/m^3) and airborne NOx (µg/m^3), applicable to this designated site. The most stringent critical load or critical level (CL) for each pollutant is indicated in bold[5].

The data provided in the table below is derived from APIS and is based on direct effects to the qualifying feature itself. We note that, although the identified species themselves as not sensitive to airborne NH_3 and NOx, the habitats that support these species are sensitive and therefore mitigation will be required to meet the conservation objectives for these species.

Table 2-1 Minimum Critical Load and Critical Level (CL) values and associated sensitive features for East Devon Pebblebed Heaths SAC and SPA

Designation	Sensitive feature	Minimum nutrient nitrogen deposition CLs (kgN/ha-year)	Minimum acid deposition CLs (MinCLMaxN, kEq/ha-year)	Minimum airborne NH_3 CLs (µg/m^3)	Minimum airborne NOx CLs (µg/m^3)
SAC	European dry heaths	**5**	1.205	**1**	**30**
SAC	Northern Atlantic wet heaths with *Erica tetralix*	**5**	1.205	**1**	**30**
SAC	*Coenagrion mercuriale*	**5**	1.205	**1**	**30**
SPA	*Caprimulgus europaeus* (unmanaged broadleafed/coniferous woodland)	**5**	**0.894**	Not sensitive	Not sensitive
SPA	*Caprimulgus europaeus* (dwarf shrub heath)	**5**	1.205		
SPA	*Sylvia undata*	**5**	1.205	Not sensitive	Not sensitive

3. AIR QUALITY HABITATS REGULATIONS ASSESSMENT METHODOLOGY

The assessment of impacts on sites designated for nature conservation was carried out in a stepwise process, designed to comply with Natural England's requirements and good practice for evaluation of the impacts of air pollution on nature conservation sites. The requirements from Natural England were developed primarily for the assessment of designated sites with European (or equivalent international) designation, namely Ramsar sites, Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).

A detailed methodology for the air quality dispersion modelling is included in Appendix A.

3.1 COULD THE PROPOSED DEVELOPMENT GIVE RISE TO EMISSIONS WHICH ARE LIKELY TO REACH A DESIGNATED SITE

Established guidance from Natural England and National Highways indicates that protected sites falling within 200 metres of the edge of a road affected by a plan or project need to be considered further.

This assessment avoided the need for relying on the assumption of a 200-metre zone of influence by including dispersion modelling of emissions from all roads with available traffic flows across the whole designated site.

[5] Air Pollution Information System, accessed 22/07/2025: https://www.apis.ac.uk/app

The model results shown later in this report indicate that potentially significant effects could occur at distances greater than 200 metres from the road, so using a 200 metre zone is not a robust approach. The approach adopted in this study ensured a robust assessment without relying on a distance-based screening criterion and provided a more detailed and complete assessment for the site.

3.2 ARE THE QUALIFYING FEATURES OF THE DESIGNATED SITE SENSITIVE TO AIR POLLUTION IMPACTS

Consideration was given to whether the designated site contains qualifying features that are sensitive to the emissions associated with the planned development. For increased road traffic resulting from the proposed development, the associated emissions include nutrient nitrogen deposition, acid deposition, airborne oxides of nitrogen (NOx) and airborne ammonia (NH_3).

The UK Air Pollution Information System (APIS)[5] was used to gather information on the EDPH site's sensitive features and identify potential sensitivity to air pollution impacts. At this stage, the spatial distribution of qualifying features within the site was not considered.

3.3 COULD A LIKELY SIGNIFICANT EFFECT OCCUR

The next step was to use the dispersion modelling results to predict the air quality impacts associated with changes in traffic flow resulting from the EDLP. For each set of model results (nutrient nitrogen deposition, acid deposition, airborne NOx and airborne NH_3), the contribution attributable to the EDLP was calculated as follows:

(2042 contribution from EDLP) = (2042 Future Year with Local Plan) – (2042 Future Base)

The contribution attributable to the EDLP was then compared to a screening threshold, where the screening threshold for each pollutant / habitat combination was set to 1% of the applicable Critical Load or Critical Level. This approach is supported by online guidance published by Defra and the Environment Agency,[6] and the Institute of Air Quality Management (IAQM)[7]. This screening threshold applies to impacts where background sources of air pollution are already causing pollution levels to be close to or above the relevant assessment criteria.

The 1% criterion is intended to be a threshold below which there is no Likely Significant Effect (LSE) and any impacts can therefore be screened out. Impacts above 1% do not necessarily correspond to the onset of damage to a designated site but should be treated as potentially significant and undergo further detailed assessment.

In view of this guidance, a threshold of a contribution of 1% of the applicable Critical Load or Critical Level was used to screen out any areas where the EDLP is predicted to have no LSE on the EDPH designated site. More detailed evaluation, and potentially mitigation, should be carried out for any areas where the risk of a LSE cannot be screened out.

3.4 IN-COMBINATION ASSESSMENT

Guidance from Natural England[8], developed following the requirements of the Wealden Judgment, advises that the screening thresholds should be applied with consideration to impacts from individual proposed developments and with consideration to in-combination effects.

The NOx pollutant background maps[9] used in the air dispersion model account for existing industrial activity, including large combustion installations, airports and shipping activity. Known industrial sources are modelled explicitly in the baseline year of the background maps, and future-year background maps are derived by incorporating datasets from the UK Department for Business, Energy & Industrial Strategy (BEIS) regarding projected energy and economic activity data for various industrial sectors. The background maps therefore

[6] Department for Environment, Food and Rural Affairs and Environment Agency, "Air emissions risk assessment for your environmental permit", July 2025.

[7] IAQM, "A guide to the assessment of air quality impacts on designated nature conservation sites", May 2020.

[8] Natural England, "Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations", June 2018.

[9] https://uk-air.defra.gov.uk/data/laqm-background-home

account for future growth in industrial sector emissions, within the limits of current government growth projections.

3.4.1.1 Planned development in adjacent authorities

The district of East Devon shares its borders with Exeter, Teignbridge, Mid Devon, Somerset and Dorset. HRA studies from these neighbouring authorities were searched in order to extract relevant information concerning other sources of in-combination effects; the results of this exercise are summarised below.

Authority	Search Results
Exeter City Council	For the roads included the East Devon study area, the HRA undertaken for the Exeter Local Plan[10] (table 3) sets out that "traffic modelling indicates no increase in traffic as a result of growth in Exeter. No credible evidence of a real risk." It is therefore clear that increased traffic from the planned development is not expected to contribute to any significant effects on the EDPH, and **in-combination impacts can be ruled out.**
Teignbridge District Council	No traffic or air quality assessment is publicly available for the Teignbridge Local Plan, and therefore it is not possible to quantify any impact as part of this assessment. The Teignbridge Local Plan[11] includes policy statement EN7, which states that "Development that is likely to have a significant effect on a European Wildlife Site with respect to air quality, will not be permitted unless an Appropriate Assessment has ascertained that following mitigation there is no adverse effect on the integrity of the site". The Local Plan also included supporting policies Policy CC3: Electric Vehicle Infrastructure and Policy CC4: Sustainable Transport and Policy. This was recommended in the supporting HRA and Natural England Statement of Common Ground[12], which concluded that, as a result, no LSEs on the EDPHs site would be expected for the plan alone or in-combination. Therefore, **in-combination impacts can be ruled out.**
Mid Devon District Council	The Local Plan HRAs for all three authorities were reviewed and contained no mention of the EDPHs. Considering this, and due to considerable distance from the EDPH study area, increased traffic from planned development is not expected to contribute to any significant effects on the EDPH, and **in-combination impacts can be ruled out.**
Somerset Council	
Dorset Council	

3.4.1.2 National infrastructure projects

The National Infrastructure Planning website[13] was investigated to identify any potentially relevant major developments. This review did not highlight any relevant projects in the vicinity of the study area.

Other new industrial plans and projects seeking planning permission will need to carry out their own in-combination assessment of effects, where applicable, as part of the HRA process.

[10] Habitats Regulations Assessment of the Exeter Plan Publication Draft, December 2024, available at: https://exeter.gov.uk/planning-services/emerging-planning-policy/the-new-local-plan-the-exeter-plan/publication-draft-exeter-plan-winter-2024-25/

[11] Teignbridge Local Plan 2020-40, November 2023, available at: https://www.teignbridge.gov.uk/evidence

[12] Teignbridge Local Plan 2020-40: Statement of Common Ground, February 2024, available at: https://www.teignbridge.gov.uk/coresubmissiondocuments

[13] National Infrastructure Planning website, accessed 4/9/25: https://national-infrastructure-consenting.planninginspectorate.gov.uk/project-search

4. HRA STAGE 1: AIR QUALITY SCREENING RESULTS

4.1 ASSESSMENT OF AIR QUALITY IMPACTS AGAINST SCREENING THRESHOLDS

This section comprises the outcome of the screening assessment described in Section 3.2.

Table 4-1 compares the maximum modelled process contribution (PC) of the EDLP to the lowest applicable CL. Values in **bold** exceed the 1% screening threshold. This screening exercise represents a precautionary approach, as it assumes that the most sensitive qualifying features (with the lowest CLs) are present in the areas with the highest modelled contribution (typically adjacent to the busiest road).

Table 4-1 Screening results based on dispersion modelling of 2042 Future Year with Local Plan scenario

Pollutant	Deposition type	Minimum CL	Maximum modelled PC	PC as % of CL
Airborne NOx (µg/m^3)	n/a	30	1.29	**4 %**
Airborne NH_3 (µg/m^3)	n/a	1	0.23	**23 %**
Nutrient nitrogen deposition (kgN/ha-year)	Grassland	5	1.27	**25 %**
	Forest	5	1.95	**39 %**
Acid deposition (kEq/ha-year)	Grassland	0.894	0.09	**10 %**
		1.205		**7 %**
	Forest	0.894	0.14	**16 %**
		1.205		**12 %**

The screening results indicate that all four pollutants exceed the 1% screening threshold for the 2042 process contribution from the EDLP. Therefore, on the basis of available evidence and agreed thresholds, LSE from air quality impacts cannot be ruled out.

4.2 DETAILED ANALYSIS

Adopting a precautionary approach, all pollutants were identified as exceeding 1% of their respective critical loads and critical levels, considering the possible presence of both qualifying feature habitats within the areas of identified exceedances. As an initial consideration for the Stage 2 Appropriate Assessment, this section considers the modelled contributions within the context of existing and forecast background pollution levels for the designated site. An initial analysis of the distribution of habitat types across the site has also been undertaken, in order to understand the potential for LSE in relation to each pollutant, qualifying feature, and SSSI unit.

4.2.1 Airborne NOx

Current background levels of NOx do not exceed 30 µg/m^3 within the EDPH site, and it is forecast that future concentrations of NOx will decrease significantly from current levels. The NOx background maps are produced by Defra on a periodic basis and are considered the best available information for future background levels of airborne NOx. There is no basis for reasonable scientific doubt in the forecast NOx levels. Additionally, the background map for the year 2040 (the latest year for which a NOx background map is available) is considered likely to over-predict NOx concentrations in 2042, which is the year applicable for our “Future Year with Local Plan” scenario.

Table 4-2 presents the total modelled NOx concentration for the 2042 “Future Year with Local Plan” scenario. The “Future Year with Local Plan” concentrations were added to the 2040 NOx background maps (with minor road contribution removed). The total NOx concentrations were then point-sampled to determine the maximum predicted environmental contribution (PEC).

Table 4-2 Summary of analysis for the maximum modelled total airborne NOx concentration

Scenario	Minimum CL (µg/m^3)	Maximum 2040 Background NOx (µg/m^3)	Maximum modelled PEC (µg/m^3)	PEC as % of CL
2042 Future Year with Local Plan	30	3.2	9.7	32 %

The PEC for NOx is predicted to be less than 50% of the applicable CL of 30 µg/m^3 throughout the designated site. On the basis of available evidence and agreed thresholds, it can therefore be concluded that no significant adverse effects are anticipated on the designated site from increased airborne NOx concentrations associated with the EDLP. No further investigation is therefore required for airborne NOx concentrations.

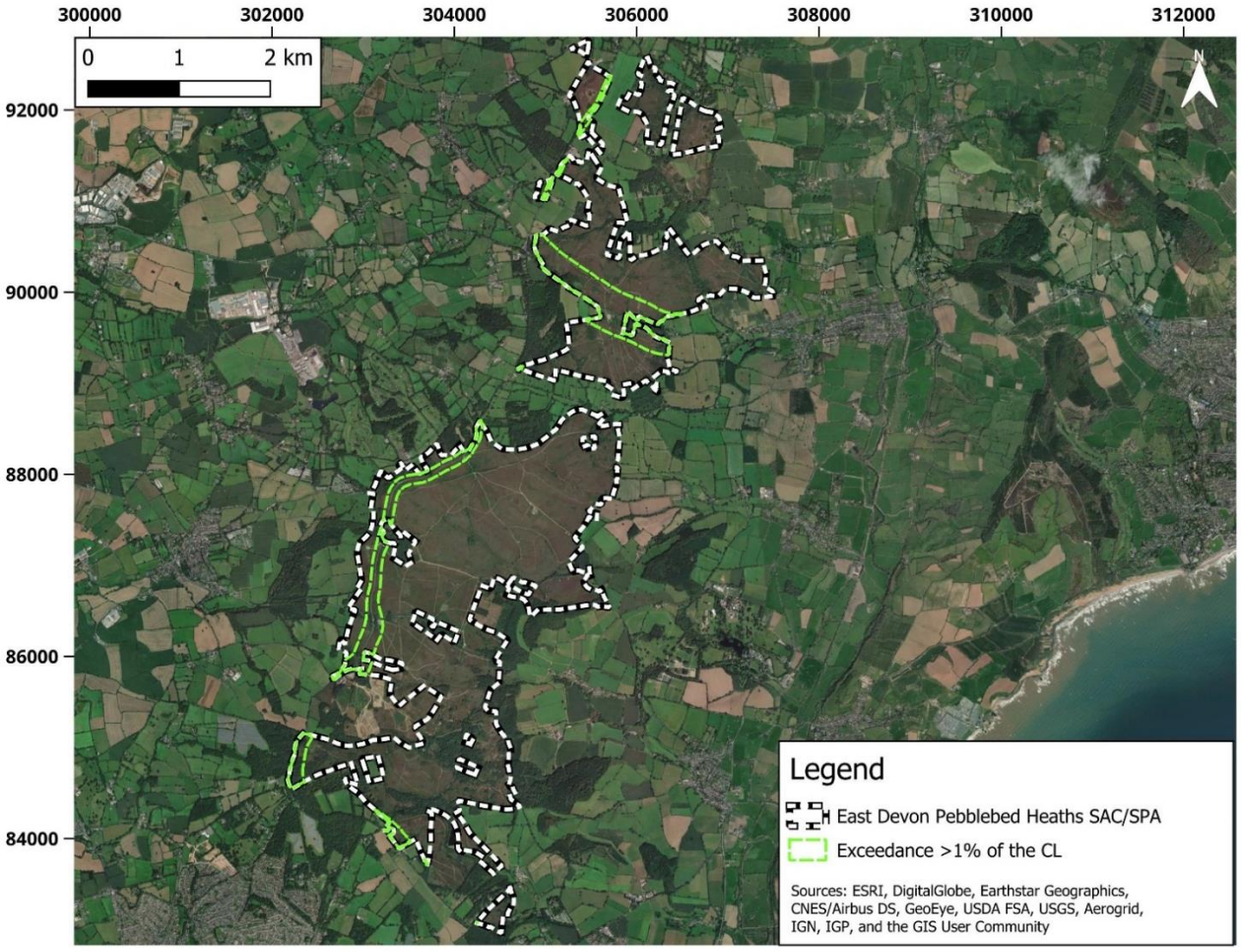
4.2.2 Airborne NH_3

Figure 4-1 illustrates the areas where the modelled NH_3 process contribution from the EDLP is predicted to exceed 1% of the CL (1 µg/m^3).

The maximum NH_3 background concentration from APIS for 2020-22 is 2.047 µg/m^3, which already exceeds the CL of 1 µg/m^3, and therefore the NH_3 PEC is also predicted to be greater than 100% of the CL.

On this basis, adverse effects on the site from NH_3 cannot be completely ruled out, and it is recommended that further analysis be undertaken in the form of an Appropriate Assessment to refine areas in which there could potentially be adverse effects based on modelled concentrations and presence of relevant habitats and species.

Figure 4-1 Overview of screening results for the NH_3 PC, assuming a CL of 1 µg/m^3



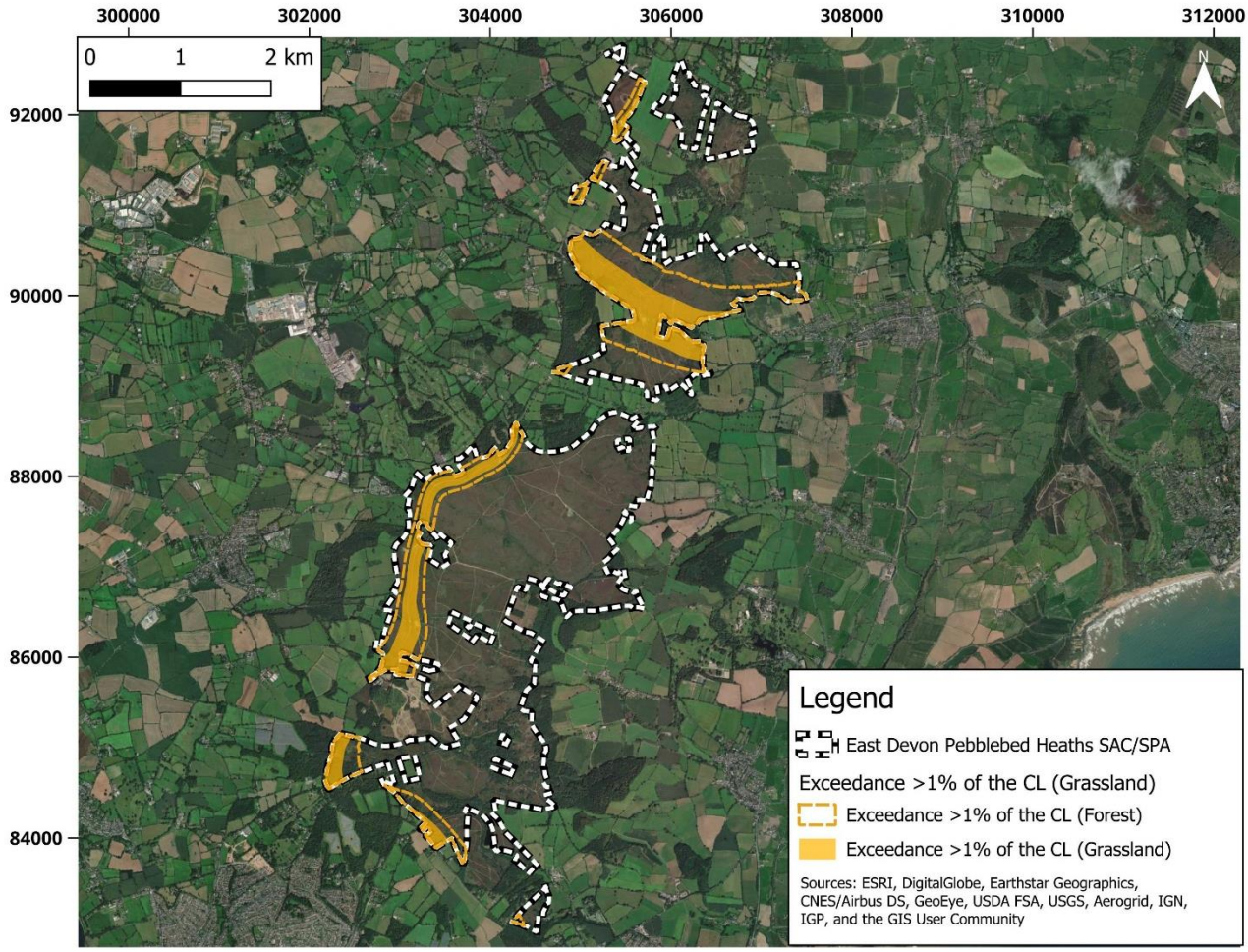
4.2.3 Nitrogen deposition

Figure 4-2 illustrates the areas where the modelled nitrogen deposition process contribution from the EDLP is predicted to exceed 1% of the CL (5 kgN/ha-year). The figure provides a comparison of deposition calculated using the deposition velocity factor for forest, and the factor for grassland.

The maximum background nitrogen deposition (2020-22) available from APIS is 15.8 kgN/ha-year for short vegetation and 28.9 kgN/ha-year for tall vegetation. Both of these background values are already well above the CL of 5 kgN/ha-year, and therefore the nitrogen deposition PEC is also predicted to be greater than 100% of the CL.

On this basis, adverse effects on the site from nitrogen deposition cannot be ruled out, and it is recommended that further analysis be undertaken in the form of an Appropriate Assessment to refine areas in which there could potentially be adverse effects based on modelled deposition rates and presence of relevant habitats and species.

Figure 4-2 Overview of screening results for nitrogen deposition PC, assuming a CL of 5 kgN/ha-year



4.2.4 Acid deposition

The most stringent CL for acid deposition on the EDPH designated site was 0.894 kEq/ha-year, for the species *Caprimulgus europaeus* (European nightjar). According to APIS, this CL is allocated for the "unmanaged broadleafed/coniferous woodland" habitat type. However, a value of 1.205 kEq/ha-year is also assigned to the *Caprimulgus europaeus* on APIS, under the habitat type "Dwarf shrub heath". Additionally, 1.205 kEq/ha-year is the acid deposition CL applicable for all other qualifying features under the site's SAC and SPA designation.

According to Natural England's Priority Habitats Inventory mapping[14], the EDPH site does include areas of deciduous woodland. However, breeding nightjar is more closely associated with lowland heath and forage in open grassland and moorland habitats[15]. There is evidence that the species will utilise recently felled or planted conifer plantations for breeding. Additionally, the Conservation Advice for the site states that "*They can be found throughout the site with their nesting habitat comprising predominantly low heath or grassland with small patches of dry, bare ground, sometimes around a young tree*"[16].

As a precautionary approach for the screening assessment, the exceedance areas for the modelled acid deposition process contribution from the EDLP were calculated against both CLs:

[14] Natural England, Priority Habitats Inventory, May 2025. Available at: https://naturalengland-defra.opendata.arcgis.com/datasets/Defra::priority-habitats-inventory-england/about

[15] British Trust of Ornithology. Nightjar *Caprimulgus europaeus*. Retrieved from Nightjar | BTO

[16] Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features – East Devon Heaths SPA. UK9010121_East Devon Heaths_SPA_Published 10 Jul 2024

- Figure 4-3 illustrates the areas where the modelled acid deposition process contribution from the EDLP is predicted to exceed 1% of the unmanaged broadleafed/coniferous woodland CL (0.894 kEq/ha-year), assuming forest (tall vegetation) deposition rates. This would be considered the most conservative approach; and
- Figure 4-4 illustrates the areas where the modelled acid deposition process contribution from the EDLP is predicted to exceed 1% of the Dwarf shrub heath CL (1.205 kEq/ha-year), assuming moorland (short vegetation) deposition rates. This would be considered a less conservative, though likely a more realistic, approach.

The maximum background acid deposition (2020-22) available from APIS is 1.148 kgN/ha-year for short vegetation and 2.115 kgN/ha-year for tall vegetation.

Taking the most conservative approach of adding the background for tall vegetation (2.115 kgN/ha-year) to the PC modelled assuming a forest deposition rate (0.139 kEq/ha-year), and comparing this to the more stringent CL for woodland (0.894 kEq/ha-year) results in a PEC which is 252% of the CL.

Taking the less conservative approach of adding the background for short vegetation (1.148 kgN/ha-year) to the PC modelled assuming a grassland deposition rate (0.090 kgN/ha-year) and comparing this to the CL for heath (1.205 kEq/ha-year) results in a PEC which marginally exceeds the CL at 103% in very limited areas.

On this basis, adverse effects on the site from acid deposition cannot be ruled out, and it is recommended that further analysis be undertaken in the form of an Appropriate Assessment to refine areas in which there could potentially be adverse effects based on modelled deposition rates and presence of relevant habitats and species. It may be possible to exclude. If it is possible to use deposition rates and minimum critical load for heathland, this would enable the risk of impacts due to acid deposition to be screened out across most or all of the habitat site.

Figure 4-3 Overview of screening results for acid deposition PC, assuming a forest deposition rate and a CL of 0.894 kEq/ha-year

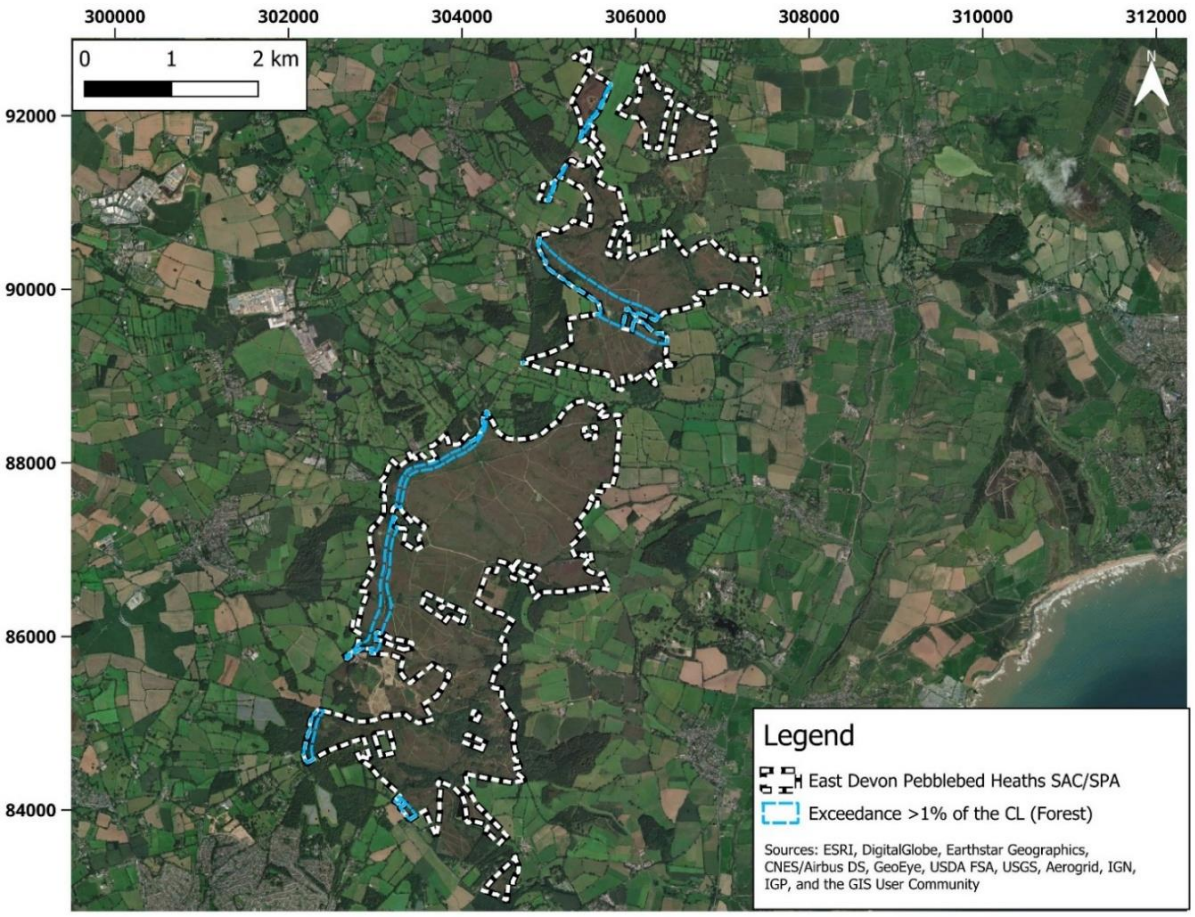
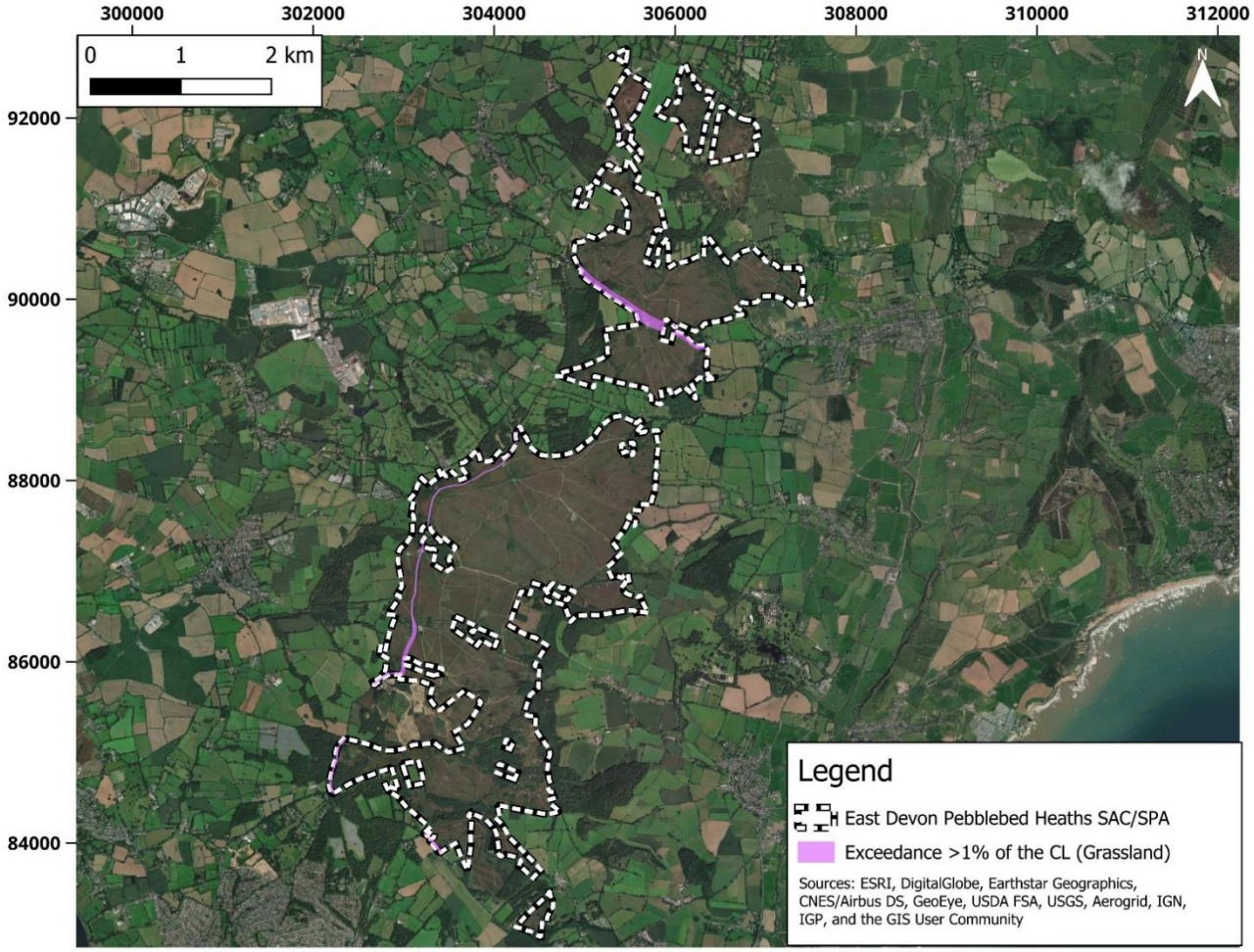


Figure 4-4 Overview of screening results for acid deposition PC, assuming a grassland deposition rate and a CL of 1.205 kEq/ha-year



4.2.5 Spatial analysis

The table below describes the features and SSSI units for which LSE can be ruled out. Supporting maps are available for each pollutant within Appendix B.

Table 4-3 Spatial screening for LSE on the East Devon Pebblebed Heaths SAC and SPA

Designation	Sensitive feature	Spatial analysis	Potential for LSE?
SAC	European dry heaths	This habitat is located throughout the site and is found in all SSSI Units. Several units are located outside the exceedance areas for all pollutants and can therefore be screened out: 002, 005, 012, 017, and 018.	**No** – SSSI units 002, 005, 012, 017, and 018. **Yes** – all other units
SAC	Northern Atlantic wet heaths with *Erica tetralix*	Lowland fens can be used as a proxy for this habitat type. According to Natural England's PHI mapping, it is solely located in SSSI units 011 and 017, entirely outside of the exceedance areas for all pollutants.	**No**
SAC	Southern damselfly *Coenagrion mercuriale*	The supporting habitat for this feature is wet heaths. Lowland fens can be used as a proxy for this habitat type. According to Natural England's PHI mapping, it is solely located in SSSI units 011 and 017, entirely outside of the exceedance areas for all pollutants.	**No**
SPA	European nightjar *Caprimulgus europaeus* (unmanaged broadleaved / coniferous woodland)	According to APIS, the feature itself is not sensitive to NH_3. However, there is potential for impacts on the supporting woodland habitat and therefore the supporting processes on which this feature relies.	**Yes**
SPA	European nightjar *Caprimulgus europaeus* (dwarf shrub heath)	According to APIS, the feature itself is not sensitive to NH_3. However, there is potential for impacts on the supporting heathland habitat and therefore the supporting processes on which this feature relies.	**No** – SSSI units 002, 005, 012, 017, and 018. **Yes** – all other units
SPA	Dartford warbler *Sylvia undata*	According to APIS, the feature itself is not sensitive to NH_3. However, there is potential for impacts on the supporting habitat and the supporting processes on which this feature relies.	**No** – SSSI units 002, 005, 012, 017, and 018. **Yes** – all other units

5. CONCLUSIONS AND RECOMMENDATIONS

This report has presented the updated dispersion modelling results of road traffic impacts from the EDLP 2020-42 on the EDPH SAC and SPA. Impacts from airborne NOx, airborne NH3, nitrogen deposition, and acid deposition were modelled across the entirety of the designated site. The results have been considered within the context of a HRA Stage 1 assessment against screening thresholds, and the below conclusions have been reached.

Review of background levels

- **Airborne NOx:** Although the maximum modelled PC exceeds the threshold of 1% of the applicable CL under the HRA Stage 1 screening assessment, preliminary considerations for the HRA Stage 2 Appropriate Assessment indicate that the maximum PEC does not exceed or approach the CL. It can therefore be concluded that no LSEs are anticipated (pre-mitigation) from the increased airborne NOx concentrations associated with the EDLP in isolation. No further attention was given to airborne NOx.
- **Airborne NH_3:** The maximum modelled PC exceeds the threshold of 1% of the applicable CL under the HRA Stage 1 screening assessment. Preliminary considerations for the HRA Stage 2 Appropriate Assessment indicate that the maximum background concentration already exceeds the CL, and therefore the PEC is also predicted to be greater than 100% of the CL. As a result, LSEs (pre-mitigation) from the increased airborne NH_3 concentrations associated with the EDLP in isolation cannot be ruled out.
- **Nitrogen deposition:** The maximum modelled PCs, for both forest and grassland deposition rates, exceed the threshold of 1% of the applicable CL under the HRA Stage 1 screening assessment. Preliminary considerations for the HRA Stage 2 Appropriate Assessment indicate that the maximum background values for both short and tall vegetation already exceed the CL, and therefore the PEC is also predicted to be greater than 100% of the CL. As a result, LSEs (pre-mitigation) from the increased nitrogen deposition associated with the EDLP in isolation cannot be ruled out.
- **Acid deposition:** Under the Stage 1 screening assessment, the maximum modelled PCs, for both forest and grassland deposition rates, exceed the threshold of 1% of the CL when compared to both potentially applicable CLs. Preliminary considerations for the HRA Stage 2 Appropriate Assessment indicate that, when the most conservative approach is taken, the PEC exceeds 100% of the more stringent CL for woodland. Taking the less conservative, but potentially more realistic approach, indicates that the PEC marginally exceeds 100% of the heathland CL in very limited areas of the site. On this basis, LSEs (pre-mitigation) from the increased acid deposition associated with the EDLP in isolation cannot be ruled out at this stage. Any measures taken to mitigate the potential impacts of airborne ammonia and nitrogen deposition would be expected to also effectively mitigate any impacts due to acid deposition.

Spatial analysis

LSE can be screened out for:

- Two of the site's five qualifying features (Northern Atlantic wet heaths with *Erica tetralix* and the Southern damselfly *Coenagrion mercuriale*) as they are located completely outside of the exceedance zones for all pollutants.
- LSE can be screened out for five of the site's sixteen SSSI units (002, 005, 012, 017, 018), as they are located completely outside of the exceedance zones for all pollutants.

In summary, for the EDLP in isolation and in-combination, any LSE from airborne NOx can be discounted for all qualifying features across the site. For the remaining pollutants, LSE can be completely discounted for some features and some areas of the site, however the potential for adverse impacts remains in some areas of the site, for European dry heaths, the European nightjar and the Dartford warbler.

A mitigation strategy ("*ED21793_East Devon Pebblebed Heaths_Mitigation Strategy_i1*") has been developed in parallel with and drawing on the outputs from the HRA Stage 1 screening undertaken in this technical report, focussing on the following features:

- European dry heaths
- European nightjar *Caprimulgus europaeus*
- Dartford warbler *Sylvia undata*

In the following areas of the site:

- North/South along the B3180, < 400 m from the road (SSSI units 1, 6, 7, 9, 10, 11, 14);
- East/West along the A3052 Exeter Road, < 600 m from the road (SSSI units 7,8);
- Bystock Nature Reserve & Withycombe Raleigh Common adjacent to B3179, < 300 m from the road (SSSI units 15, 16); and
- Dalditch Common, < 150 m from the road (SSSI unit 13).

The mitigation strategy report outlines the recommendations for next steps.

APPENDICES

APPENDIX A AIR QUALITY MODELLING METHODOLOGY

A.1 AIR QUALITY MODELLING SYSTEM

The RapidAIR Urban Air Quality Modelling Platform was used to predict air pollutant concentrations for this study. This is Ricardo Energy & Environment's proprietary modelling system developed for urban air pollution assessment.

RapidAIR has been developed to provide graphic and numerical outputs which are comparable with other models used widely in the United Kingdom. The model approach is based on loose-coupling of three elements:

- Road traffic emissions modelling conducted using fleet specific algorithms to prepare grams/kilometre/second (g km^{-1} s^{-1}) emission rates of NOx (via the Defra Emissions Factors Toolkit (EFT)[17]) and NH_3 (via RapidEMS, which incorporates emissions factors from the Calculator for Road Emissions of Ammonia (CREAM)[18]).
- Convolution of an emissions grid with dispersion kernels derived from the USEPA AERMOD[19] model, at resolutions ranging from 1 m to 20 m. AERMOD provides the algorithms which govern the dispersion of the emissions and is an accepted international model for road traffic studies.
- Running the kernel-based RapidAIR model and using GIS software to prepare dispersion fields of concentration for further analysis via a set of Python/arcpy decision-support tools coded by Ricardo.

RapidAIR includes an automated meteorological processor based on AERMET which obtains and processes meteorological data of a format suitable for use in AERMOD. Surface meteorological data is obtained from the NOAA online repository[20] and upper air data is downloaded from the NOAA Radiosonde database.[21]

The model produces high resolution concentration fields at the city scale (down to a 1 m scale) so is ideal for spatially detailed compliance modelling. The combination of an internationally recognised model code and careful parameterisation matching international best practice makes RapidAIR ideal for this study. A validation study has been conducted in London using the same datasets as the 2011 Defra air quality model inter-comparison study.[22] Using the LAEI (London Atmospheric Emissions Inventory) 2008 data and the measurements for the same time period the model performance is consistent (and across some metrics performs better) than other modelling solutions currently in use in the UK.[23] This validation study has been published in *Environmental Modelling and Software*, in partnership with the University of Strathclyde.[24]

A.2 MODEL DOMAIN

Dispersion modelling was carried out to forecast levels of air pollutants at a 3m x 3m grid resolution across the entire East Devon Pebblebed Heaths designated site. A grid height of 1.5m was modelled. Dispersion modelling was carried out for three scenarios which are summarised in Table A 1

The required data was then extracted from the grid results to provide a detailed evaluation of air quality impacts at locations within the designated site.

[17] Defra Emissions Factors Toolkit v13.1, available at https://laqm.defra.gov.uk/air-quality/air-quality-assessment/emissions-factors-toolkit/

[18] Air Quality Consultants, Calculator for Road Emissions of Ammonia (CREAM) v2, available at https://www.aqconsultants.co.uk/resources

[19] https://www3.epa.gov/ttn/scram/dispersion_prefrec.htm#aermod

[20] ftp://ftp.ncdc.noaa.gov/pub/data/noaa

[21] https://www.esrl.noaa.gov/roabs/

[22] https://uk-air.defra.gov.uk/research/air-quality-modelling?view=intercomparison

[23] The 2008 LAEI dataset was used in this context as a benchmarking study, to compare the performance of RapidAIR to other modelling systems. The 2008 LAEI dataset was not used as an input in the current modelling study.

[24] Masey, Nicola, Scott Hamilton, and Iain J. Beverland. "Development and evaluation of the RapidAIR® dispersion model, including the use of geospatial surrogates to represent street canyon effects." *Environmental Modelling & Software* (2018). DOI: https://doi.org/10.1016/j.envsoft.2018.05.014

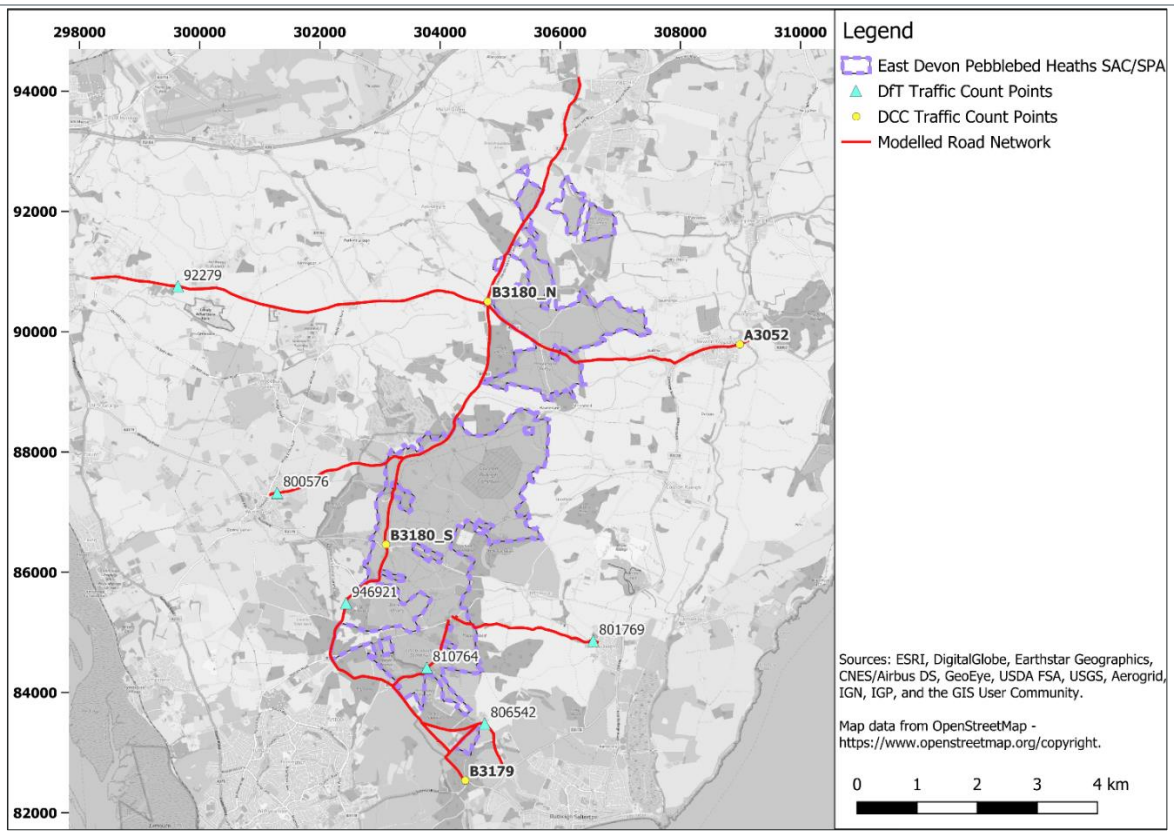
Table A 1 List of modelling scenarios carried out

Scenario	Description
2022 Base Year	This scenario was designed to replicate 2022 traffic conditions within the study area in order to verify the performance of the air dispersion model.
2042 Future Base	This scenario assumed background traffic growth in line with DfT's TEMPRO software (v8.0). Additionally, it included all known current development and infrastructure, as well as all committed development and infrastructure, up to 2042. Development associated with the EDLP was excluded from this scenario. This was a hypothetical scenario against which to test the impacts of the EDLP, as it assumes there will be no development within the district up to 2042 other than at sites which already have planning permission.
2042 Future Year with Local Plan	This scenario is equivalent to the '2042 Future Base' scenario, with the addition of development proposed in the EDLP. A comparison of both scenarios made it possible to assess any impacts attributable to the EDLP in isolation.

A.3 TRAFFIC ACTIVITY DATA

Annual average daily traffic (AADT) vehicle numbers and average vehicle speeds were provided by Devon County Council for four discrete count points on the following roads: A3052, B3179, B3180_N and B3180_S. AADT was provided for all three scenarios, with the exception of B3179, for which only the Local Plan contribution data was available. The 2022 baseline data for B3179 was supplemented with AADT from a representative DfT count point (see section A.4) and scaled to 2042 to represent the 2042 baseline using the TEMPRO 2022 to 2042 scaling factor provided by the Council. Figure A 1 shows the locations of the DCC and supplementary DfT traffic count point locations with respect to the modelled road network.

Figure A 1 Modelled road links and traffic count points



A.4 SUPPLEMENTARY TRAFFIC DATA FOR AIR QUALITY MODELLING

Supplementary AADT and fleet composition data (vehicle type flows) were taken from representative DfT count points. Where available, 2022 AADT and vehicle class flows were used, however, for some count points, the latest available data was for 2019. DfT's TEMPRO software (v8.0) was used to determine a localised AADT scaling factor for 2019 to 2022, and the resulting factor (0.9364) was applied to the 2019 AADT.

All 2022 AADT from the DfT count points was scaled to 2042 using the same TEMPRO 2022 to 2042 scaling factor provided by the Council, that was used for the DCC count points.

A.5 TRAFFIC SPEED DATA

Speed data was provided from the Council in road shapefile format, and a sense-check completed to ensure there were no unrealistic road speeds. In the case of some links with missing speed data, these were gap-filled by using the speed from the adjacent link. Additionally, there was a section of the A3052 to the east of the model domain which was missing speed data. This was a longer section of road where the speed limit changed to 30mph, so for this road it was not considered appropriate to gap-fill with the speed from the adjacent link. This road was surveyed in Google Street view, and it was considered appropriate to use the national average speed for rural classified local A roads (33.4mph)[25].

A.6 FLEET COMPOSITION

DfT count point data was used to determine fleet composition breakdown into cars, light goods vehicles (LGVs), heavy goods vehicles (HGVs) and buses. NAEI (National Atmospheric Emissions Inventory) fleet split information was then applied to further split cars and LGVs into electric, petrol and diesel categories, based on national average fleet composition information for rural roads for 2022, and for 2042 for the future year scenarios.

For 2042, DfT fleet compositions were scaled according to factors calculated from national rural fleet compositions in 2022 and 2042, as provided in the NAEI fleet projections for those years (base year 2022, published July 2022).[26] This ensured that the 2042 scenarios captured predicted increases in proportions of electric cars and electric LGVs in the fleet.

DfT vehicle flows were normalised according to the percentage light and heavy flow provided in the DCC traffic data for road links represented by the A3052, B3180_N and B3180_S count points.

A.7 EMISSION FACTORS

Vehicle emission factors were obtained for NOx from Defra's Emissions Factors Toolkit (EFT)[17] and for NH_3 via RapidEMS. RapidEMS incorporates emissions factors from the Calculator for Road Emissions of Ammonia (CREAM)[18] and links directly to Ricardo's RapidAIR dispersion modelling system.

The input for RapidEMS consists of a basic fleet split based on vehicle categories (diesel cars, petrol cars, LGVs, articulated HGVs, rigid HGVs, and buses) according to the traffic activity information specified in Section A.6. RapidEMS is used to provide a more detailed parameterization of vehicle fleets in 2042 including all vehicles up to and including Euro 6/VI.

A.8 METEOROLOGICAL DATA

RapidAIR includes an automated meteorological processor based on AERMET which obtains and processes meteorological data of a format suitable for use in AERMOD. Surface meteorological data is obtained from the

[25] Department for Transport, "Accredited official statistics – Travel time measures for local 'A' roads January to December 2023 report", https://www.gov.uk/government/statistics/travel-time-measures-for-the-strategic-road-network-and-local-a-roads-january-to-december-2023/travel-time-measures-for-local-a-roads-january-to-december-2023-report#urbanrural-split, accessed 03/07/2025.

[26] National Atmospheric Emissions Inventory, "Emission factors for transport", http://naei.beis.gov.uk/data/ef-transport , accessed 26/06/2025.

NOAA online repository[27] and upper air data is downloaded from the NOAA Radiosonde database[28]. Meteorological data for 2022 was used in order to enable the model validation for this study.

For this study, 2022 surface meteorological data was obtained from three stations (Exeter, Dunkeswell Aerodrome and Liscombe, in that priority order) and upper air meteorological data was obtained from two stations (Cornwall and East Sussex). RapidMET was used to carry out data filling where necessary according to the methodology provided by the USEPA in their "Meteorological Monitoring Guidance for Regulatory Modelling Applications" guidance document[29]. Data gaps from the primary meteorological station (Exeter and Cornwall) are first filled using data from the other nearby stations (Dunkeswell Aerodrome then Liscombe for the surface station and East Sussex for the upper air station).

A.9 REFERENCE YEAR MODELLING AND MODEL VERIFICATION

This section provides a summary of the model verification process and the derivation of linear adjustment factors to improve model performance.

Verification of the model involves comparison of the modelled results with any local monitoring data at relevant locations; this helps to identify how the model is performing and if any adjustments should be applied. The verification process involves checking and refining the model input data with the aim of reducing uncertainties and produce model outputs that are in better agreement with the monitoring results. This can be followed by adjustment of the modelled results if required to reproduce measured levels as accurately as possible. The relevant procedures are set out in Defra's LAQM.TG(22) guidance.[30] This recommends making the adjustment to the road contribution of the pollutant only and not the background concentration these are combined with.

A.9.1 Oxides of nitrogen (NOx) and nitrogen dioxide (NO_2) model verification and adjustment

The approach outlined in Chapter 4 of LAQM.TG(22) has been used in this case. To verify the model, the predicted annual mean Road NOx concentrations were compared with concentrations measured at the various monitoring sites during 2022.

Prior to conducting the model verification, a review of the monitoring site available from EDDC's 2023 Annual Status Report (ASR)[31] was conducted to define the monitoring sites relevant to include within the verification. Six NO_2 diffusion tube monitoring sites located on the modelled road network (adjacent to the A3052) with 2022 annual mean NO_2 concentrations available were used in the model verification.

The modelled vs measured concentrations at each of the monitoring locations were compared. Refinements were subsequently made to the model inputs to improve model performance where possible, and a linear **adjustment factor of 2.5195** was calculated for the road emissions component of the NOx model.

Total NOx was calculated as the sum of the adjusted NOx road contribution from RapidAIR and the Defra base year 2021 background maps for 2022 (with primary, trunk and motorway sources removed from the background map). Total NO_2 concentrations at specified receptors were obtained from background and adjusted road NOx concentrations using the latest version of the NOx to NO_2 calculator provided by Defra (v9.1). Where annual NO_2 concentration maps were required, total NO_2 was derived using the following equation:

$$(NO_2 \text{ in } \mu g/m^3) = -0.0016(NOx \text{ in } \mu g/m^3)^2 + 0.5204(NOx \text{ in } \mu g/m^3) + 1.3638$$

A plot comparing modelled and monitored total NO_2 concentrations during 2022 is presented in Figure A 2.

[27] ftp://ftp.ncdc.noaa.gov/pub/data/noaa

[28] https://www.esrl.noaa.gov/roabs/

[29] United States Environmental Protection Agency, "Meteorological Monitoring Guidance for Regulatory Modelling Applications" available via https://www3.epa.gov/scram001/guidance/met/mmgrma.pdf , accessed June 2019.

[30] Defra, LAQM.TG(22), May 2025. Available at: https://laqm.defra.gov.uk/air-quality/featured/uk-regions-exc-london-technical-guidance/

[31] East Devon District Council Annual Status Report 2023. Available at: https://eastdevon.gov.uk/environmental-health-and-wellbeing/land-air-and-water-pollution/air-quality/air-quality-in-east-devon/

To evaluate model performance and uncertainty, the Root Mean Square Error (RMSE) for the observed vs predicted NO_2 annual mean concentrations was calculated, as detailed in Technical Guidance LAQM.TG(22). This guidance indicates that an RMSE of up to 4 µg/m^3 is ideal, and an RMSE of up to 10 µg/m^3 is acceptable. The calculated RMSE is presented in Table A 2. In this case the RMSE was calculated at 4.1916 µg/m^3.

Figure A 2 Predicted annual average NO_2 concentrations against measured concentrations at monitoring locations. The 10% and 25% confidence intervals are also plotted.

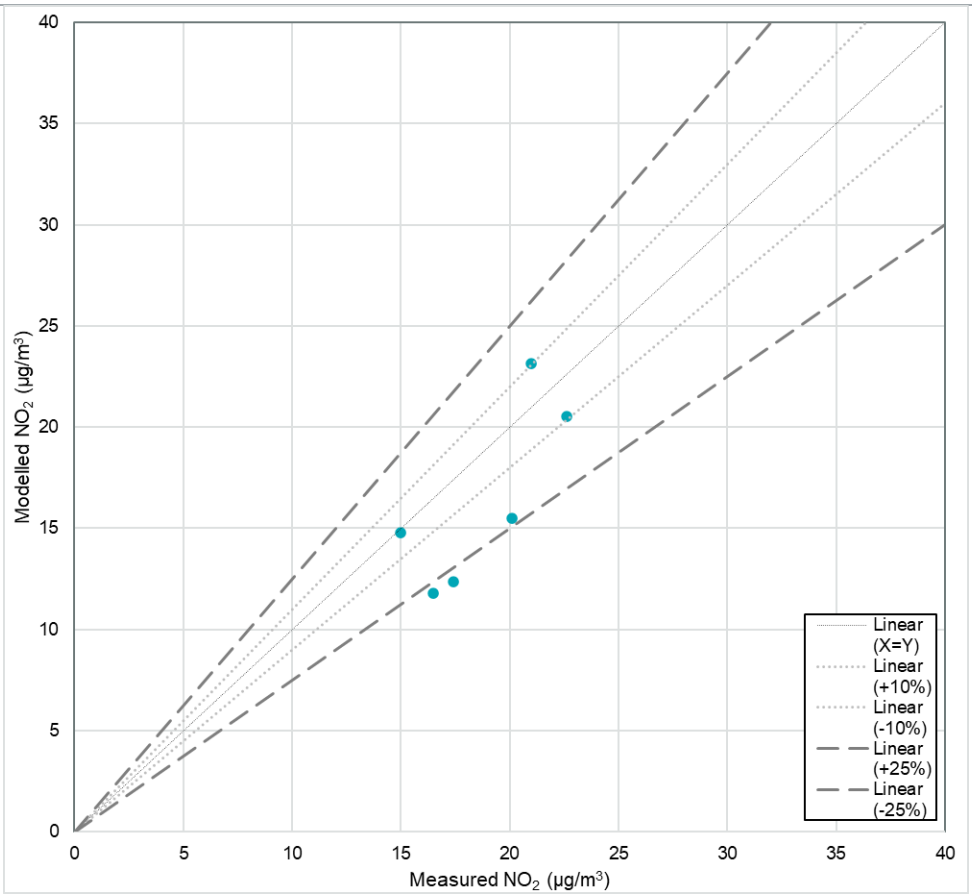


Table A 2 Modelled and measured NO_2 concentrations for the 2022 reference year and calculated RMSE value

Site ID	Measured NO_2 2022 (µg/m^3)	Total Modelled NO_2 (µg/m^3)	Difference (µg/m^3)
N72	15.0	13.9	-1.1
N84	16.5	11.1	-5.4
N64_GP	17.4	11.7	-5.7
N65	22.6	19.2	-3.4
N82	21.0	21.7	0.7
N83	20.1	14.6	-5.5
		RMSE	**4.1916**

A.9.2 Ammonia (NH_3) model verification and adjustment

The "Development of CREAM Emissions Model Version 2" documentation[32] states that "CREAM V2 has been calibrated against ambient measurements using predictions made with ADMS-Roads. In most cases, this negates the requirement to verify model outputs against local measurements (although in those cases where

[32] Air Quality Consultants, February 2025, Development of CREAM Emissions Model Version 2. Available at: https://www.aqconsultants.co.uk/resources

roadside NH_3 measurements are available, local verification may still be helpful". There are no monitoring locations for NH_3 located within the study area, and therefore no further adjustment to the modelled concentrations for NH_3 were made.

A.10 FUTURE SCENARIO MODELLING

A.10.1 Airborne pollutant concentrations

For the two future scenarios, RapidAIR was used to generate pollutant concentration maps across the entire designated site at a 3m x 3m resolution. These maps were generated using transport model traffic activity data from the appropriate future scenario, emission factors calculated using the EFT and RapidEMS, and 2022 meteorological data.

Pollutant concentration maps for road-only contributions (NOx, NO_2, and NH_3) were calculated using the adjustment factor described in Section A.9. Maps for total pollutant concentrations (NOx and NO_2) were calculated by adding the road-only concentration maps to the appropriate pollutant background map from the LAQM website. As the Defra base year 2021 background maps don't extend beyond 2040, 2040 background maps were used for the future modelling year of 2042 (with primary, trunk and motorway sources removed from the background map).

A.10.2 Pollutant deposition

Dry deposition rates of nutrient nitrogen and acid were calculated by multiplying the 1.5 m height level air concentration of the appropriate pollutants by the appropriate deposition velocity, followed by multiplication with a conversion factor.

Deposition velocities and conversion factors were obtained from Environment Agency guidance,[33] and are provided in the tables below.

Table A 3 Deposition velocities for NO_2 and NH_3

Pollutant	Vegetation type	Deposition velocity (m/s)
NO_2	Grassland (sites with short vegetation)	0.0015
	Woodland (sites with tall vegetation)	0.003
NH_3	Grassland (sites with short vegetation)	0.02
	Woodland (sites with tall vegetation)	0.03

Table A 4 Dry deposition conversion factors

Pollutant	Conversion factor for nitrogen deposition (from µg/m^2-s to kgN/ha-year)	Conversion factor for acid deposition (from µg/m^2-s to kEq/ha-year)
NO_2	95.9	6.84
NH_3	260	18.5

A.10.3 Model years and considerations

This study assesses air pollution concentrations across the study area for a future scenario in 2042. It is therefore important to consider the model results for future scenarios in the context of emerging trends in emissions.

Total emissions of NOx in the UK decreased by 79 % between 1990 and 2023. This was primarily caused by a decline in coal use and modernisation of the road transport fleet. Road transport contributed 30 % of NOx

[33] Environment Agency, "AQTAG06: Technical guidance on detailed modelling approach for an appropriate assessment for emissions to air," March 2014

emissions in 2023. Due to the replacement of older vehicles in the fleet with those that meet stricter emissions standards, and the more recent uptake of electric vehicles, annual emissions from road transport decreased by 70 % between 2005 and 2023[34]. I can therefore be considered appropriate to base future decisions on further anticipated reductions in baseline NOx concentrations with a high degree of confidence, as these are based on firm policy commitments, are technically achievable, and are already being observed in practice.

Total emissions of NH_3 decreased by 14% between 1990 and 2023. As the primary contributor, agriculture made up 87 % of NH_3 emissions in 2023, with a slight increase observed since 2010. Contributions from road transport have steadily decreased since 2000, with the introduction of new vehicle emission standards and uptake of electric vehicles as also mentioned above. Road transport contributed 2 % of NH3 emissions in 2023 compared with 7 % in 2002[35].

A.11 SOURCES OF MODEL UNCERTAINTY

There are a number of sources of model uncertainty inherent in this type of study, as discussed below:

- Uncertainties in the amount and distribution of development accounted for in the transport modelling. Household projections are revised from time to time and may vary from the values included in the transport model. Additionally, the transport model accounts for development growth and associated increases in background traffic within the core and buffer regions of the model. However, there will also be future development in the 'external' region which has not been included explicitly in the transport model.
- The amount and distribution of development described in the EDLP will be subject to refinement as individual local plans are developed in further detail.
- Uncertainties introduced by the need to extend the transport model data to cover the full area of potential concern.
    - Uncertainties in the traffic model outputs on modelled road links, with regards to number of vehicles, type of vehicles and vehicle speed. These include uncertainties in calculating the number of EVs in the fleet in both the 2022 and 2042 fleets, and using national NAEI projections for EVs rather than localised data.
    - Uncertainties in predicting baseline traffic activity data for 2022 using supplementary DfT traffic flow counts for 2019 which were scaled to 2022 using a TEMPRO scaling factor.
    - Uncertainties in predicting baseline traffic activity data for 2042, using a TEMPRO scaling factor to scale the 2022 data.
- Uncertainties in the real-world emissions from Euro 6/VI vehicles. Early real-world emission test results of Euro 6 vehicles indicate mixed results, ranging from vehicles which met the Euro 6 standards under real-world driving emissions to vehicles which displayed NOx emissions up to 12 times higher than the Euro 6 standard.[36,37] However, the increasing use of real-world emissions tests is likely to intensify pressure on vehicle manufacturers to comply with more stringent Euro standards. If real-world emissions do not decrease as anticipated, East Devon may wish to review the current study in the context of updated emission parameters at some point in the future.
- Uncertainties in the background maps used to develop model adjustment factors and predict total modelled concentrations, with regards to other sources of pollution, such as industrial sources, domestic heating, port activity and forest fires.
- Uncertainties resulting from the lack of monitoring data for ammonia (NH_3). We have adopted a conservative approach in our analysis by using the NOx model adjustment factors we derived. This is

[34] Defra, Trends in total annual emissions of nitrogen oxides in the UK, 1990 to 2023 (accessed August 2025). Available at: https://www.gov.uk/government/statistics/emissions-of-air-pollutants/emissions-of-air-pollutants-in-the-uk-nitrogen-oxides-nox#trends-in-total-annual-emissions-of-nitrogen-oxides-in-the-uk-1990-to-2023

[35] Defra, Trends in total annual emissions of ammonia in the UK, 1990 to 2023 (accessed August 2025). Available at: https://www.gov.uk/government/statistics/emissions-of-air-pollutants/emissions-of-air-pollutants-in-the-uk-ammonia-nh3#trends-in-total-annual-emissions-of-ammonia-in-the-uk-1990-to-2023

[36] The Real Urban Emissions Initiative, https://www.trueinitiative.org/.

[37] Emissions Analytics, EQUA Index, https://equaindex.com/equa-air-quality-index/.

expected to result in an over-prediction of the impacts associated with NH_3, including airborne NH_3 concentrations, nitrogen deposition and acid deposition. The incorporation of monitoring data for NH_3 would result in a more robust model.

- Uncertainties in the dispersion modelling process. These are accounted for so far as possible through the model verification process, but there inevitably remain some differences between modelled concentrations and the levels that would be measured in practice.

The use of a robust model verification process and adoption of a conservative approach is designed to take account of these uncertainties, ensuring that air quality impacts are more likely to be over-estimated than under-estimated.

APPENDIX B DETAILED MAPS OF EXCEEDANCE AREAS

Figure B 1 EDPH North: Detailed screening results for the NH_3 PC, assuming a CL of 1 µg/m^3



Figure B 2 EDPH South: Detailed screening results for the NH_3 PC, assuming a CL of 1 µg/m^3

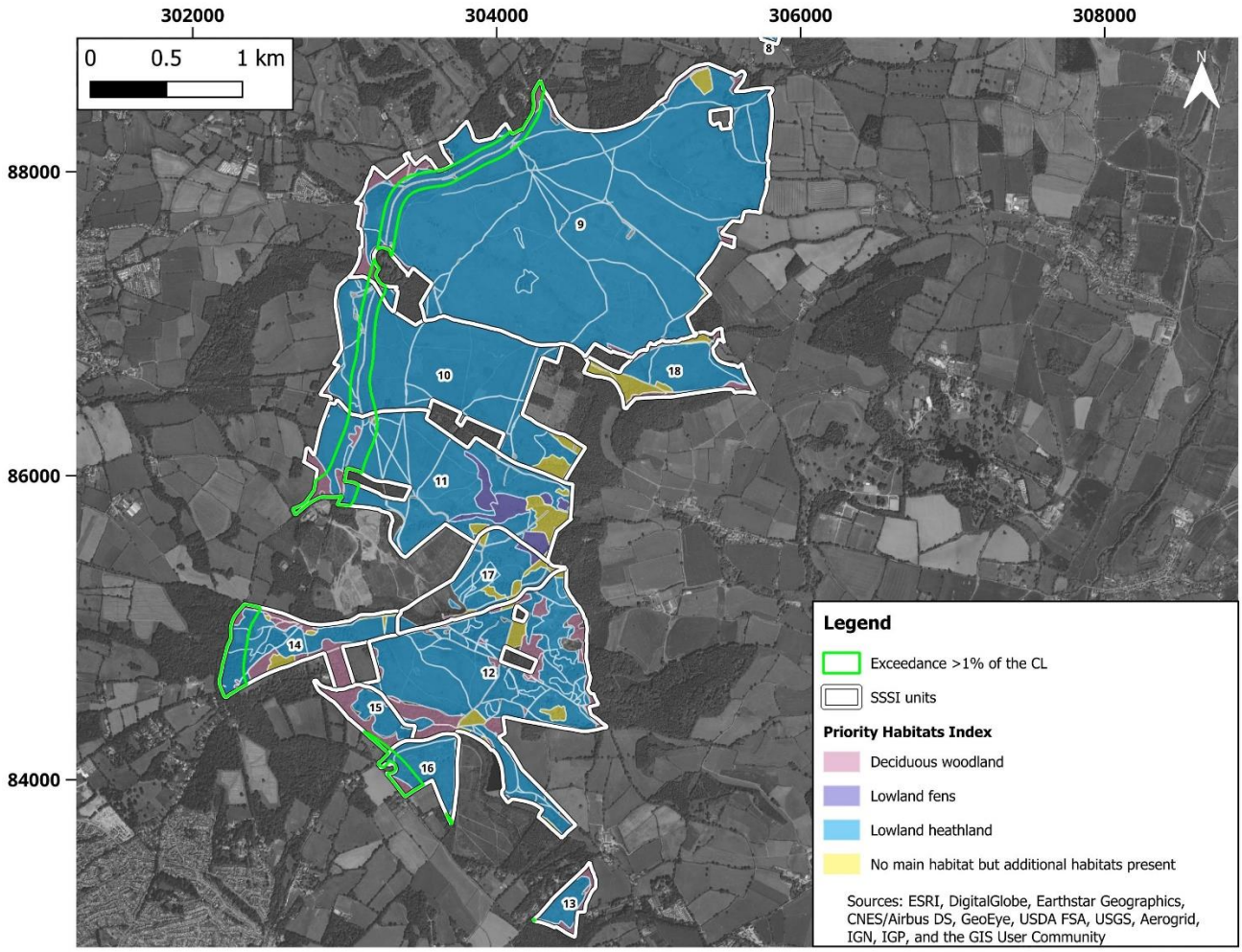


Figure B 3 EDPH North: Detailed screening results for nitrogen deposition PC, assuming a CL of 5 kgN/ha-year

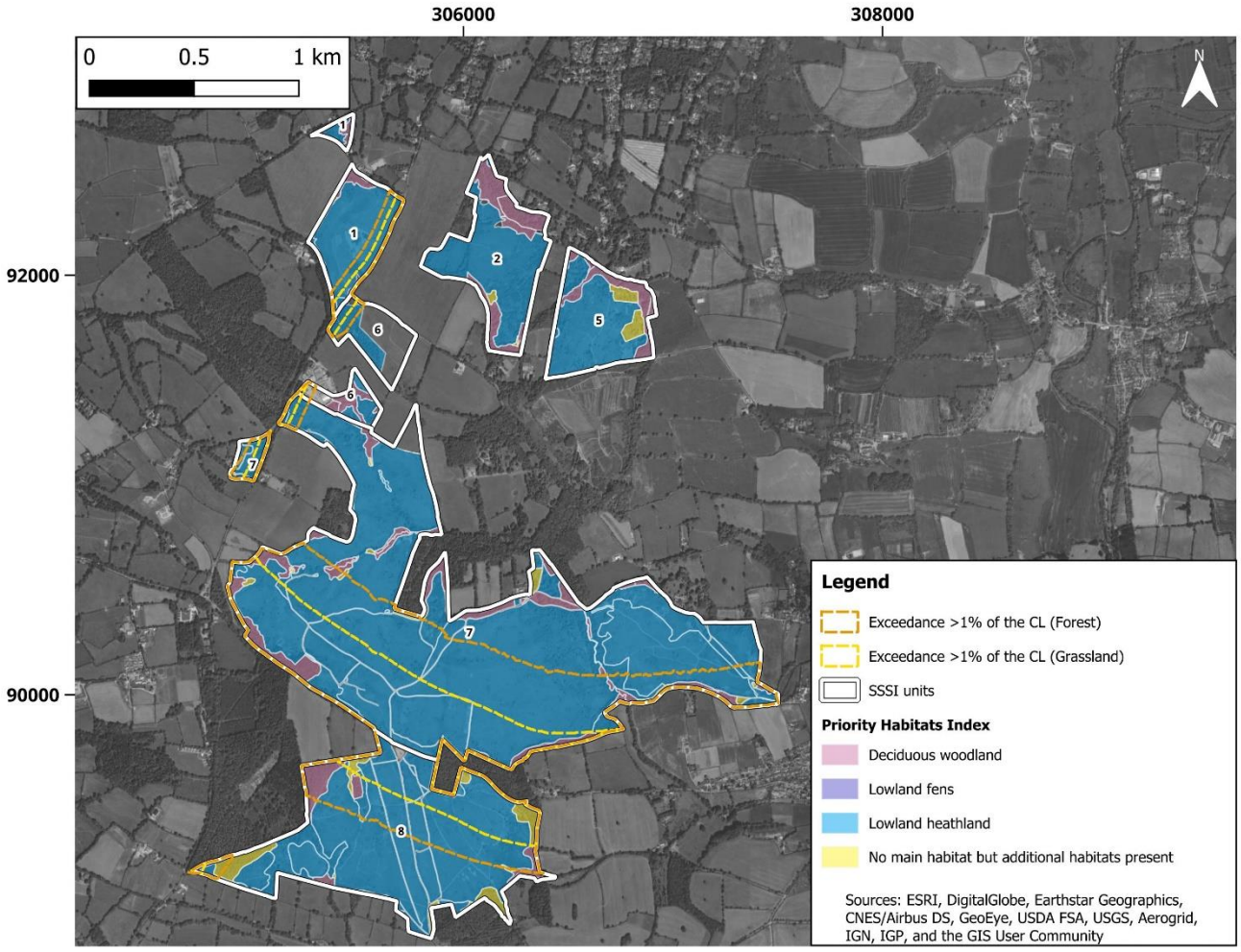


Figure B 4 EDPH South: Detailed screening results for nitrogen deposition PC, assuming a CL of 5 kgN/ha-year

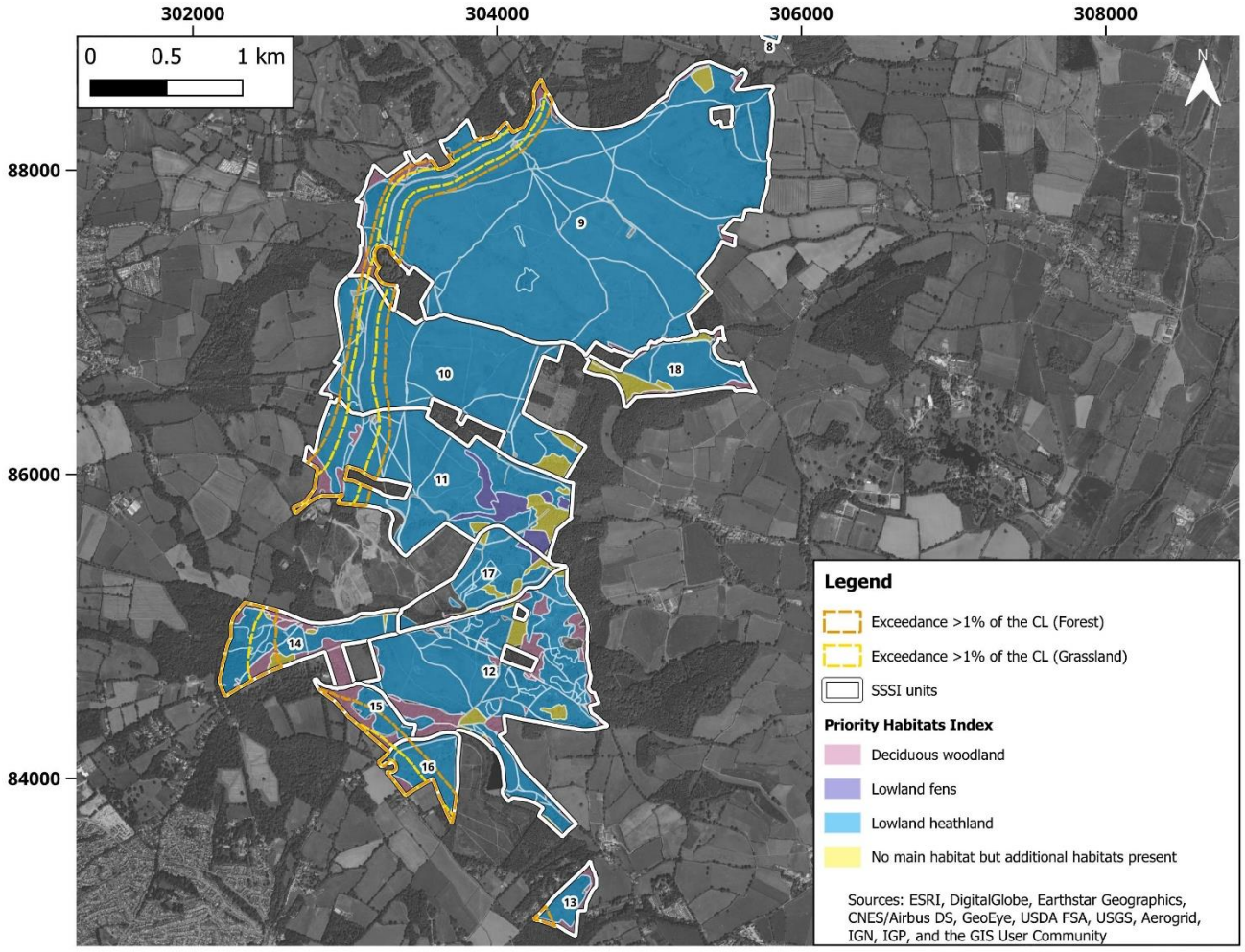
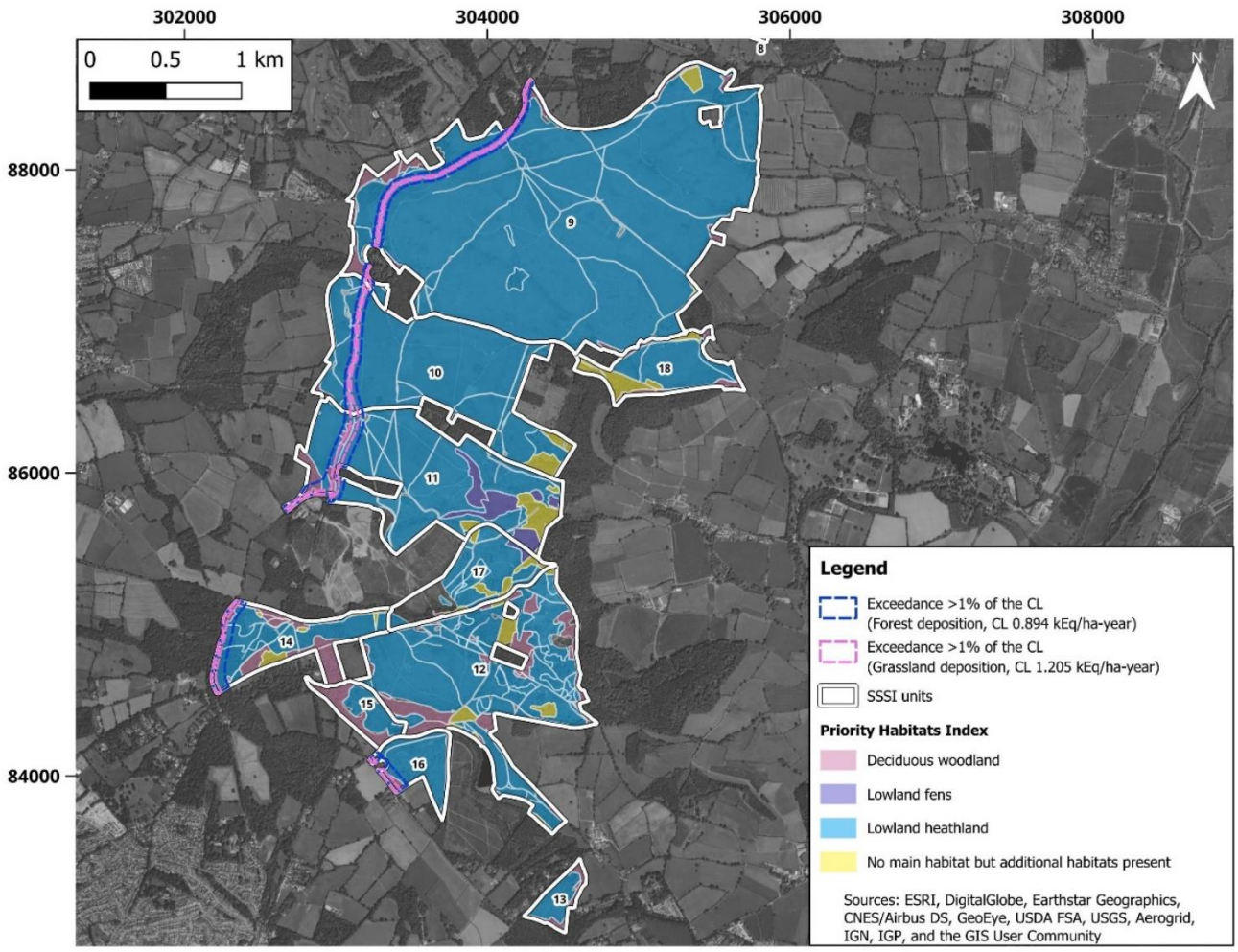


Figure B 5 EDPH North: Detailed screening results for acid deposition PC



Figure B 6 EDPH South: Detailed screening results for acid deposition PC





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REPORT

The East Devon Water Cycle Study

Revised, November 2025

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APPENDIX B WER water bodies within the EDDC region.

APPENDIX C Protected and priority species in East Devon.

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Acronym	Acronym description
AEP	Annual Exceedance Probability
AMP	Asset Management Plan
AMR	Annual Monitoring Report
AP	Abstraction Point
BAP	(UK) Biodiversity Action Plan
BGS	British Geological Survey
BOD	Biological Oxygen Demand
BRAVA	Baseline Risk and Vulnerability Assessment
CAF	Capacity Assessment Framework
CAMS	Catchment Abstraction Management Strategy
CDA	Critical Drainage Area
CFMP	Catchment Flood Management Plan
CROW	Countryside and Rights of Way Act
CSO	Combined Sewer Overflow
CWS	County Wildlife Sites
DEFRA	Department for Environment, Food and Rural Affairs
DG5	Director General Performance Measure 5
DPD	Development Plan Documents
DWF	Dry Weather Flow
DWMP	Drainage and Wastewater Management Plan
DYAA	Dry Year Annual Average
DYCP	Dry Year Critical Period
EDDC	East Devon District Council
EDM	Event Duration Monitoring

Acronym	Acronym description
EFI	Environmental Flow Indicators
EIA	Environmental Impact Assessment
EIP	Environmental Improvement Plan
FCERM	Flood and Coastal Erosion Risk Management
FRA	Flood Risk Assessment
FRMP	Flood Risk Management Plan
FRR	Flood Risk Regulations (2009)
FWMA	Flood and Water Management Act (2010)
ha	Hectare
HoF	Hands off Flow
HoL	Hands off Level
HELAA	Housing and Economic Land Availability Assessment
HRA	Habitat Regulations Assessment
IDB	Internal Drainage Board
LAR	local affordability ratio
l/p/d	Litres per person per day
l/h/d	Litres per household per day
LFRMS	Local Flood Risk Management Strategy
LHN	Local Housing Need
LLFA	Lead Local Flood Authority
LORP	Lower Otter Restoration Project
LPA	Local Planning Authority
m	Metre
NCERM	National Coastal Erosion Risk Map

Acronym	Acronym description
NNR / LNR	National Nature Reserve / Local Nature Reserve
NH_4	Ammonia
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
NVZ	Nitrate Vulnerable Zone
OAN	Objectively Assessed Need
ONS	Office for National Statistics
P	Phosphate
PCC	Per Capita Consumption
PE	Population Equivalent
PFRA	Preliminary Flood Risk Assessment
PO	Planning Objective
PWS	Public Water Supply
RAG	Red, Amber Green
RBCS	Risk-based Catchment Screening
RBMP	River Basin Management Plan
RMA	Risk Management Authority
SAC	Special Area of Conservation
SEPA	Scottish Environment Protection Agency
SFRA	Strategic Flood Risk Assessment
SHMA	Strategic Housing Market Assessment
SPA	Special Protection Area
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest

Acronym	Acronym description
STW	Sewage Treatment Works
SuDS	Sustainable Drainage Systems
SWMP	Surface Water Management Plan
SWW	South West Water
TAL	Technically Achievable Limit
TPU	Tactical Planning Unit
WCS	Water Cycle Study
WCWE	West Country Water and Environment Group
WCWRG	West Country Water Resources Group
WER	Water Environment Regulations
WFD	Water Framework Directive
WRC	Water Recycling Centre
WRMP	Water Resources Management Plan
WRLTMP	Water Recycling Long Term Management Plan
WRZ	Water Resource Zone
WwTW	Wastewater Treatment Works

Executive Summary

Overview

The East Devon Water Cycle Study (WCS) has been commissioned by East Devon District Council (EDDC) with the collaborative expertise of Haskoning. This report serves to inform the new East Devon Local Plan (2025), providing a policy framework for aligning upcoming development with sustainable water management principles to benefit the community and environment.

Purpose and objectives

The WCS has several objectives, namely, to understand:

- whether there is sufficient wastewater and water supply capacity through South West Water (SWW) for new developments,
- the requirements for water quality maintenance and improvement,
- the protection of natural capital,
- how wider planning policies like biodiversity enhancement can be informed.

East Devon is characterised by its largely agricultural landscape with limited urban development. It faces the challenge of accommodating relatively high population and housing growth without compromising its water resources and environmental integrity.

Key findings and strategies

The key findings of the WCS are:

- **Water resources and water management:** Future developments are likely to stress the water management units of Otterton, Fairmile, and Fenny Bridges. Specifically, surface water availability in these management units is likely to be impacted and result in a future water deficit in East Devon. SWW have developed a Water Resources Management Plan (WRMP), that sets out how the company plans to overcome the predicted deficit, pointing towards a need for strategic planning in water supply and quality management.
- **Wastewater management:** Three critical areas are identified as being at high risk from nutrient loading due to the increases in wastewater production from proposed housing developments: the River Exe Estuary, the River Axe, and the Otter Estuary. These areas are vulnerable due to direct effluent discharges or cumulative effects from multiple sources, exacerbating existing problems like phosphate pollution. Infrastructure enhancements and continued rigorous planning are recommended to handle the increased wastewater and sewage loads expected from new developments.
- **Biodiversity and conservation:** The WCS emphasises mitigating potential negative impacts on biodiversity, especially in designated conservation sites like the River Exe Estuary, the River Axe, and the Otter Estuary. The WCS recommends that any future Habitat Regulations Assessments (HRAs) specifically consider the vulnerability of the Exe Estuary and River Axe to high nutrient levels input from various sources, including sewage treatment works (STW) and agriculture. The WCS also advises on monitoring and further testing to assess potential increases in nutrient discharge and contaminants from wastewater treatment works (WwTWs) and surface runoff.
- **Policy recommendations:** To ensure sustainable growth and compliance with environmental standards, EDDC must embed water efficiency and water quality safeguards into the emerging Local Plan. This includes mandating the stricter Building Regulations standard of 110 litres per person per day and requiring developments to demonstrate measures for water recycling and enhancement of the water environment. In parallel, strategic coordination with South West Water is essential to address capacity constraints at major wastewater treatment works. Early investment planning and phased infrastructure upgrades will be critical to avoid delays in housing delivery and maintain regulatory compliance. This requires phased development to align with planned capacity

upgrades at key WwTWs, including Honiton, Feniton, Woodbury, Seaton South, and Fluxton which impacts a total proposed 2,031 dwellings. Countess Wear is also predicted to marginally exceed capacity if all the proposed dwellings are implemented which may impact the phasing of some of the proposed 8,796 dwellings that will be within its treatment network. The 133 dwellings planned within the Colyton WwTW network will require immediate phasing discussions. Projected growth is expected to exceed treatment capacity and, according to RQP modelling, breach the current Biochemical Oxygen Demand (BOD) permit set by the Environment Agency. Immediate intervention to enhance biological treatment processes and secure permit amendments is essential to enable delivery.

Summary

The East Devon WCS outlines the essential considerations for managing water resources, wastewater, and environmental conservation considering projected development across the district. Its evidence-based observations and recommendations aim to steer East Devon towards a future where growth and sustainability coexist equally, ensuring that water management practices enhance rather than compromise the natural and built environment.

1 Introduction

1.1 Background

Haskoning has been commissioned to support East Devon District Council (EDDC) by preparing a Water Cycle Study (WCS) to inform the new East Devon Local Plan 2020-2042. This WCS will allow the local authority to plan for sustainable growth that benefits communities and while avoiding impacts on the environment by ensuring:

- There is enough wastewater capacity for new developments – for example, capacity to collect, transport and treat wastewater (both foul and surface water).
- There is adequate water supply for new developments – where there are pressures, development plan documents may need to include a policy requiring the higher level of water efficiency for new housing.
- There is good water quality within the local catchment.
- Natural capital (such as forests, rivers, land, and minerals) is not degraded – for example, through soil erosion from surface water runoff.

Water cycle studies can also inform wider planning policies on issues such as Biodiversity Net Gain (BNG), mitigating and adapting to climate change, reducing flood risk and sustainable drainage, and improving health and recreation opportunities. Some of these issues will be explored as part of this WCS. Although East Devon is the subject of this water cycle review, there is a potential for the work to be extended to integrate with other local catchments.

This report was originally drafted in 2023. Following consultation with South West Water (SWW), an updated dataset was incorporated into the WCS in October 2025. This update also included additional information to support a re-assessment of EDDC's growth projections, based on revised housing allocations, updated water resources investments and updated wastewater treatment capacity data from SWW.

1.2 Overview of East Devon area

The East Devon district is largely agricultural with only 7% of the area classed as urban or developed, compared to a national average of 16%. Across the East Devon area many of the Major Rivers (such as the River Otter, the River Axe and River Clyst) fall within proximity to the sewage network (which extends to areas outside of the district) and are connected to WwTW's that are owned by SWW as shown in Figure 1.11. The draft Local Plan proposes to focus new development around the larger towns of East Devon and in a new town to the east of Exeter.

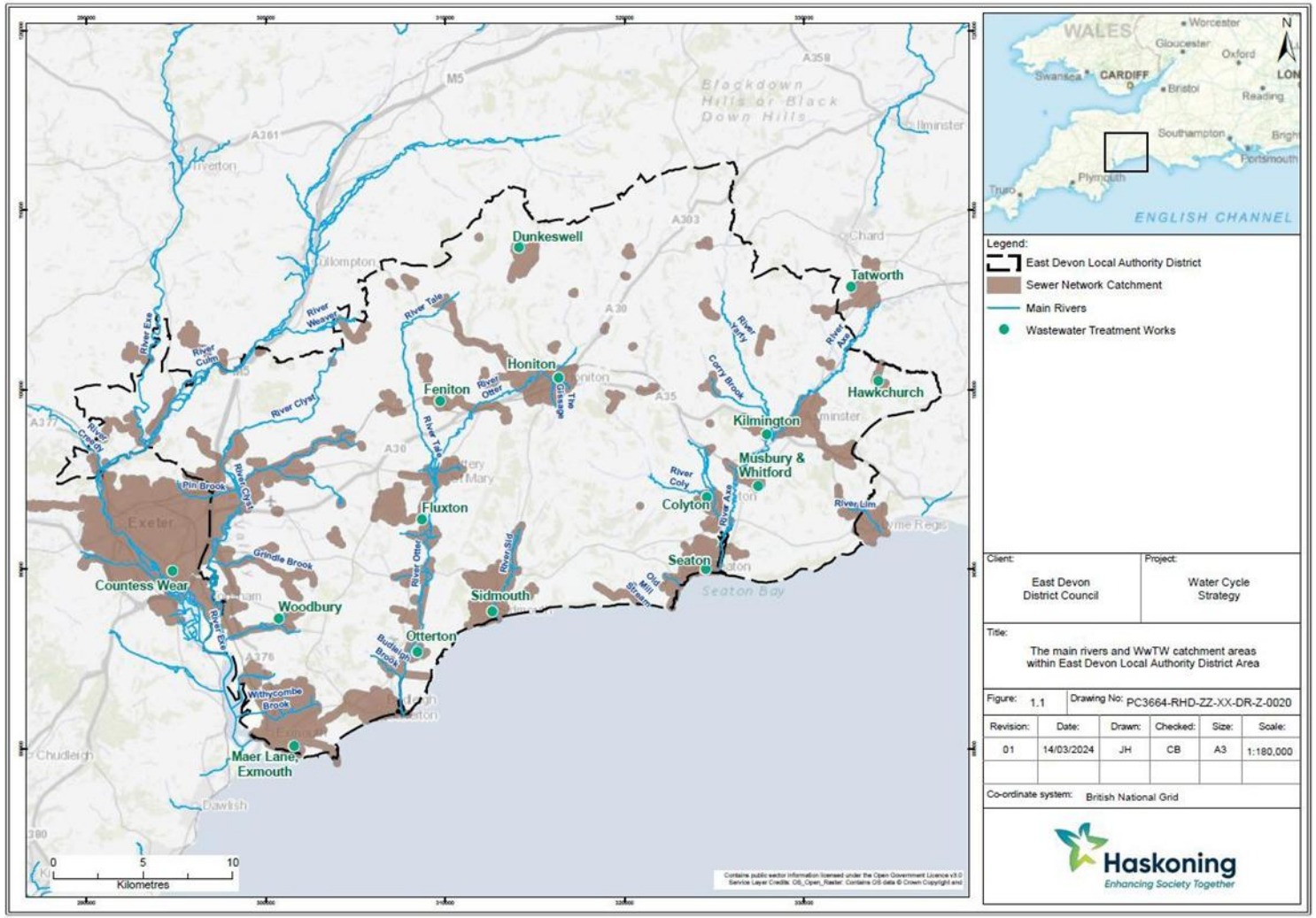


Figure 1.1: Map of East Devon Local Authority District Area, WwTW catchment areas and the rivers within the area

1.3 The Water Cycle Study

1.3.1 Objectives

A WCS is a voluntary study that helps organisations work together to plan for sustainable growth. It uses water and planning evidence to understand environmental and infrastructure capacity. It can identify joined up and cost-effective solutions that are resilient to climate change for the lifetime of strategic developments across a planning cycle. When prepared at an early stage of plan-making, water cycle studies provide evidence for plans and sustainability appraisals. This WCS was led by EDDC with the aim being to provide robust evidence for their Local Plan. Information has been gathered and used within this WCS from organisations including the Environment Agency, Natural England, and SWW.

Unlike a Strategic Flood Risk Assessment (SFRA), a WCS is not a requirement of the National Planning Policy Framework (NPPF). However, the NPPF states that strategic policies in development plan documents should make 'sufficient provision' for infrastructure for water supply and wastewater, and planning practice guidance states that a WCS can help in the preparation of a plan for sustainable growth.

Water cycle studies provide evidence for plans and sustainability appraisals and are ideally completed at an early stage of plan-making. Local authorities (or groups of local authorities) usually lead water cycle studies, as the chief aim is to provide evidence for robust local plans.

The WCS has been prepared to inform the site selection process in the Local Plan and aims to identify existing connections between planning and water related policies and needs in an integrated way. The main objective of the WCS is to identify any constraints on planned housing growth that may be imposed by the water cycle. The WCS then identifies how these can be resolved, i.e., by ensuring that appropriate Water Services Infrastructure (WSI) can be provided to support the proposed development. Furthermore, it provides a strategic approach to the management and use of water which ensures that the sustainability of the water environment in the area is not compromised. It is anticipated that this report will stimulate discussion between stakeholders involved, facilitating a better understanding of the water issues in East Devon. Information within this WCS will use information provided within the current draft Local Plan and adopted East Devon Local Plan. Consultation on the draft (emerging) Local Plan ran from May to June 2024 and the first Regulation 19 draft Local Plan consultation ran from February to March 2025. From herein the most recent draft Local Plan is referred to as the 'draft Local Plan Feb 2025.

This WCS also includes updated information on the housing supply from the EDDC 2025 plans and updated information from SWW on the planned investment and available capacity at their potable water and wastewater treatment works (WwTW) from 2025 data.

In the context of this WCS the water cycle considers natural and anthropogenic processes, their interactions and how systems collect, store and/or transport water in the environment.

1.3.2 Overarching drivers

There are two key overarching drivers shaping the direction of the WCS as a whole:

1. Delivering sustainable water management, to ensure that provision of WSI and mitigation is sustainable, contributes to the overall delivery of sustainable growth and development and that the Local Plan meets with the requirements of the NPPF with respect to water, wastewater and water quality.

2. Compliance with environmental legislation and standards, including the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (commonly referred to as the 'Water Environment Regulations' – WER) and The Conservation of Habitats and Species Regulations 2017 (commonly referred to as the Habitats Regulations'). This legislation sets out requirements to ensure that growth requiring additional abstraction of water for supply and the discharge of treated effluent does not prevent water bodies within East Devon (and more widely) from achieving the standards required of them as set out in the WER and specific standards for water dependent sites protected under the Habitats Regulations.

1.3.3 Sources of data

The data used in the WCS has been obtained from several sources. A review of publicly available documents for the study area has been undertaken and refreshed with up-to-date information obtained in consultation with key stakeholders, including:

- **EDDC**
- **SWW**
- **Environment Agency**
- **Natural England**

A detailed list of all data used in the WCS and corresponding sources is presented at the end of this report (**Section 8**).

1.3.4 Data quality and assumptions

As with all studies of this nature, the analysis relies heavily on data and information supplied by third parties. This WCS has collated data from multiple parties, using the best available information at the time of preparation. Data has been checked and reviewed for accuracy wherever possible, but it is generally assumed that all data provided is accurate and up to date.

Much of these data are not static and are regularly being updated and revised as new information is collected or trends in development change. This WCS reflects a point in time and may need to be reconsidered at a later point when data updates or review against changes to legislation or planning guidance may be required.

1.3.5 Report structure

The remainder of this report comprises the following sections:

- **Section 0** sets out a brief description of the proposed development in East Devon based on the consultation draft Local Plan Feb 2025 version of the emerging Local Plan.
- **Section 0** summarises the legislative drivers and frameworks that are referred to within this WCS.
- **Section 0** summarises water resources and supply.
- **Section 5** sets out the wastewater collection, treatment, and water quality in East Devon.
- **Section 6** discusses the potential impact on East Devon's biodiversity and areas of conservation.
- **Section 7** concludes the report, summarising the main findings as they pertain to new development in East Devon.
- **Section 0** provides a list of all sources used in the report.

Maps of the key datasets relating to all aspects of this WCS are presented at a district-wide scale and provided alongside this report.

- **Appendix A** details the data sources which have been used to develop the figures and tables in this WCS.
- **Appendix B** outlines the WER water bodies within the EDDC region.
- **Appendix C** lists the protected and priority species in East Devon.
- **Appendix D** lists a summary of past consultation with SWW.

2 Development in East Devon

This section presents a summary of the housing and employment growth forecast upon which the Local Plan and this WCS is being conceived.

2.1 Estimated growth

The East Devon area has experienced relatively high population growth in the past decade and is expected to experience a significant increase in housing growth over the period leading up to 2040. Based on a 2022 evaluation of the local housing needs (LHN) assessment, 18,920 new dwellings were proposed to meet the growing housing demand across the region, amounting to an average of 946 new dwellings per year over the next 20 years.

The numbers used in this WCS refer to site allocations that have been derived from the consultation draft Local Plan Feb 2025 and it should be noted that this number relates to 2024/2025 and is used as a 'base date' for this WCS and is anticipated to be updated annually. This is calculated based on the 2024 National Planning Policy Framework (NPPF), which sets out the Government's standard methodology for assessing LHN.

2.1.1 Calculating local housing need in East Devon

The WCS is based on the development levels set out in the consultation draft Local Plan February 2025. It should be noted the figures are subject to annual review and future drafts of the Local Plan will be informed by new figures. This WCS focusses on housing growth and does not include the assessment of employment land.

2.1.2 Five-year housing land supply

In accordance with the requirements of the NPPF, EDDC has identified the expected supply of specific deliverable sites to provide a minimum of five years' worth of housing need. This assessment is set out in full in the Council's 'Five Year Housing Land Supply' report. As of 31 March 2024, EDDC has assessed its housing land supply against the Local Housing Need requirement of 893 dwellings per year. This equates to a five-year requirement of 4,465 dwellings. The total number of homes considered deliverable within the five-year period from April 2024 to March 2029 is 3,706 dwellings. This includes sites with extant planning permission, strategic allocations within the Cranbrook expansion zones, and an allowance for future windfall development.

2.2 Site allocations for development

Based on the latest Office for National Statistics (ONS) affordability statistics and the Government's standard Methodology, the level of need is 950.4 dwellings per year (equating to 20,909 over a 22-year plan period from 2020 to 2042) in East Devon. The 2022 Housing and Economic Land Availability Assessment (HELAA) identified 614 sites (related to housing development) or parts of sites that theoretically could be developed. Noting that these sites may not necessarily be allocated in the Local Plan, or that a planning permission (in-principle) should be granted if an application were submitted that output of the HELAA indicates 57 sites or part of which are available for employment development (**Figure 2.1**). The locations of these proposed developments separated by catchment can be seen in **Figure 2.2** to **Figure 2.4**. The proposed dwellings numbers presented were based on new allocations data received prior to the publication of the EDDC Draft Local Plan Feb 2025. As such, there may be minor discrepancies in the data used to inform this WCS. The

WCS provides an assessment of the conditions at the time of data collection, and the findings are still considered applicable to inform the Draft Local Plan.

Table 2.1 highlights the number of dwellings from associated catchments within East Devon that have been used for this WCS assessment.

There are a predicted 39,888 net dwellings within the 20-year period plan, significantly above the Government's targets. The next sum of 5-year developments of dwellings within the associated SWW assets are shown in **Table 2.2**.

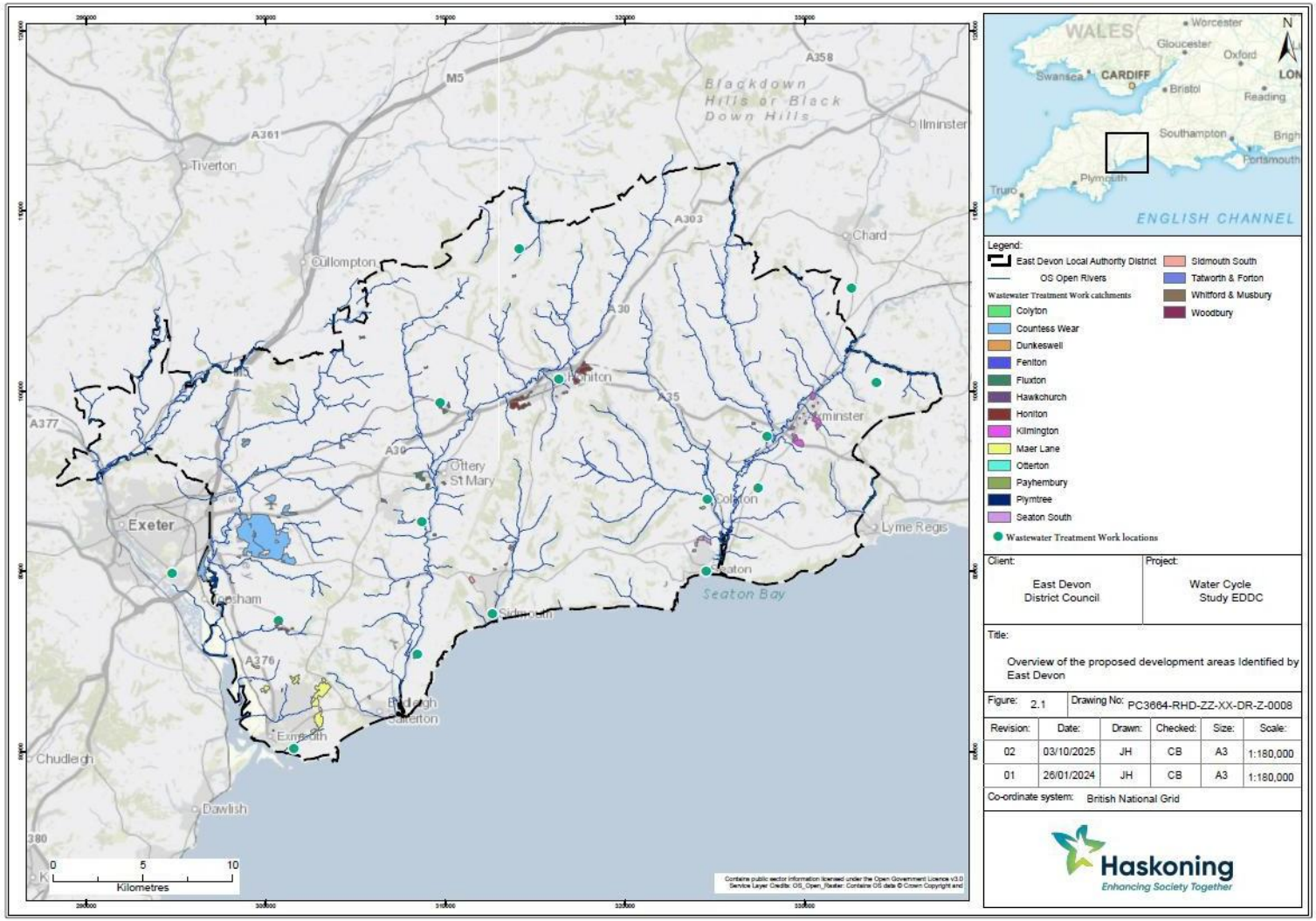


Figure 2.1: Overview of the proposed development areas Identified by East Devon (areas are separated and coloured by which WwTW will serve the proposed developments)

Table 2.1: Details of the dwellings used for the WCS assessment (Source: EDDC, 2025)

Settlement area	Dwellings used WCS assessment	Catchment (WwTW)
Axminster	1,076	Kilmington
Broadclyst	90	Countess Wear
Broadhembury	10	Honiton
Budleigh Salterton	35	Maer Lane
Chard Street	5	Kilmington
Chardstock	30	Tatworth
Clyst St Mary	72	Countess Wear
Colyton	61	Colyton
Dunkeswell	43	Dunkeswell
East Budleigh	22	Maer Lane
Exmouth	1,321	Maer Lane
Exton	53	Countess Wear
Feniton	102	Feniton
Hawkchurch	12	Hawkchurch
Honiton	838	Honiton
Kilmington	28	Kilmington
Lympstone	196	Maer Lane
Newton Poppleford	53	Otterton
Musbury	22	Whitford & Musbury
Otterton	10	Otterton
Ottery St Mary	352	Fluxton
Payhembury	15	Feniton
Plymtree	30	Feniton
Seaton	286	Seaton South
Sidbury	43	Sidmouth
Sidmouth	172	Sidmouth
Tipton St John	5	Fluxton
Topsham	596	Countess Wear
West Hill	64	Fluxton
Whimple	83	Countess Wear
Woodbury	216	Woodbury
Second New Community	8,000	Countess Wear
Total	**13,941**	**-**

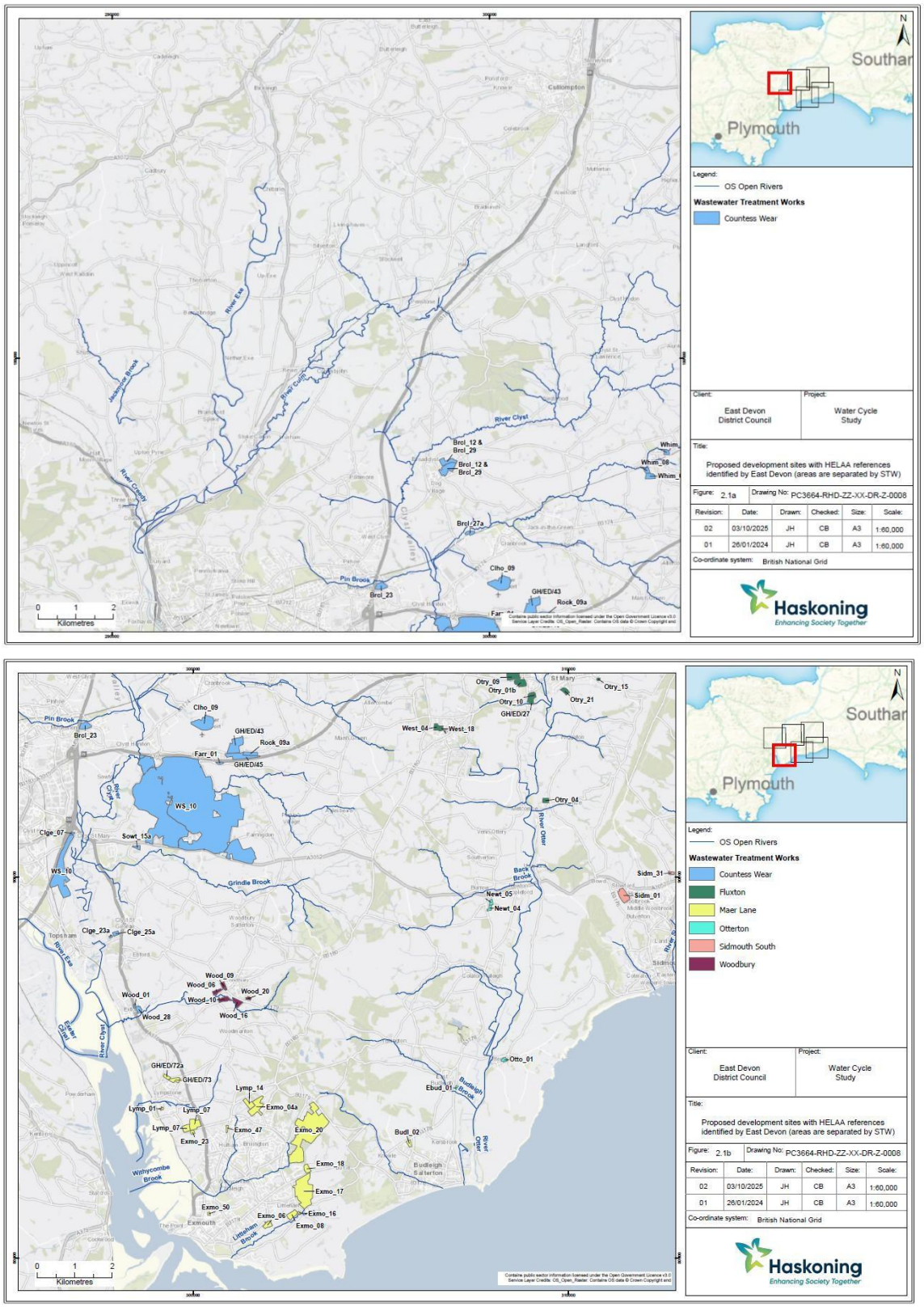


Figure 2.2: Proposed development sites with HELAA references identified by East Devon (areas are separated and coloured by which WwTW will serve the proposed developments)

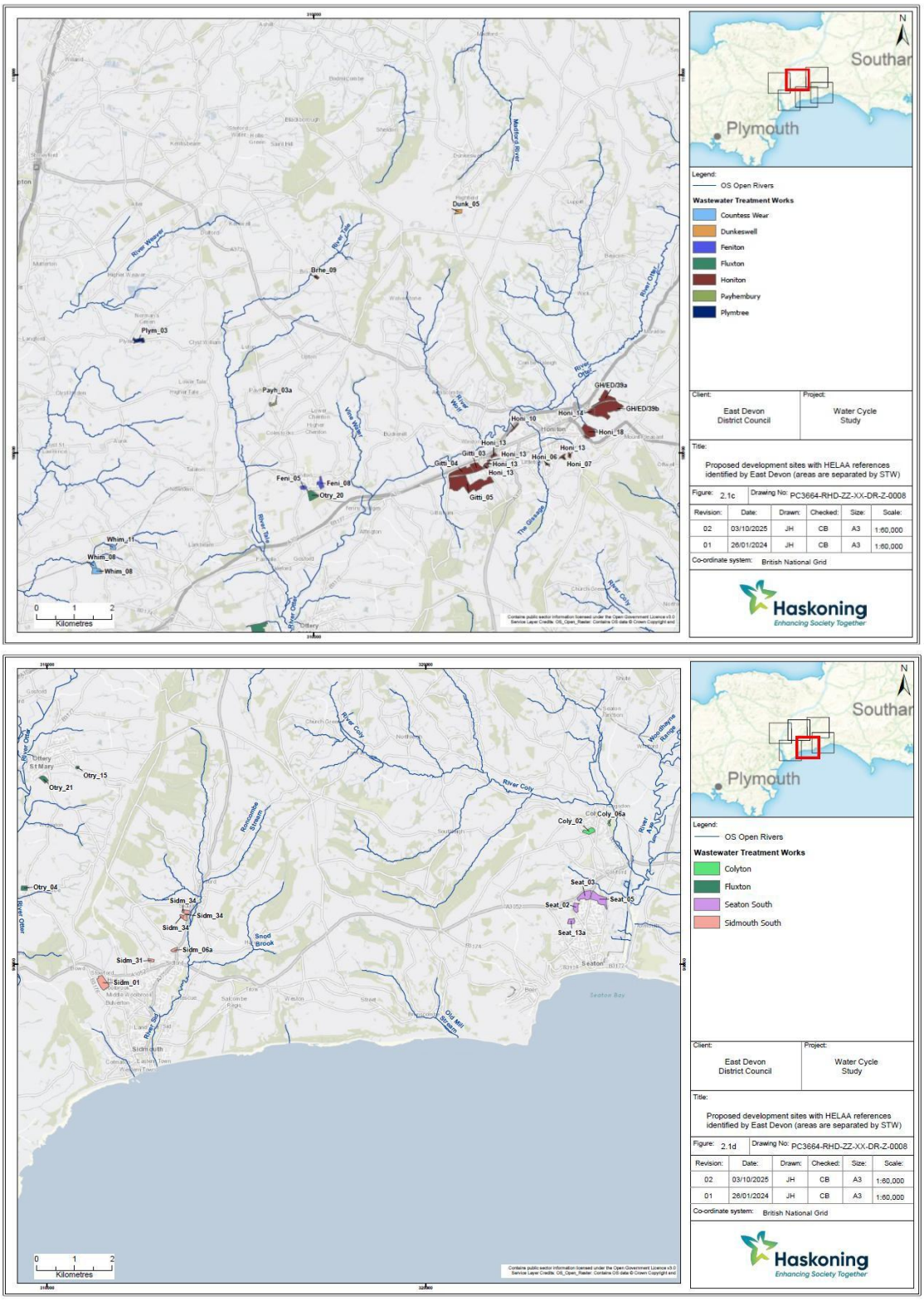


Figure 2.3: Proposed development sites with HELAA references identified by East Devon (areas are separated and coloured by which WwTW will serve the proposed developments)

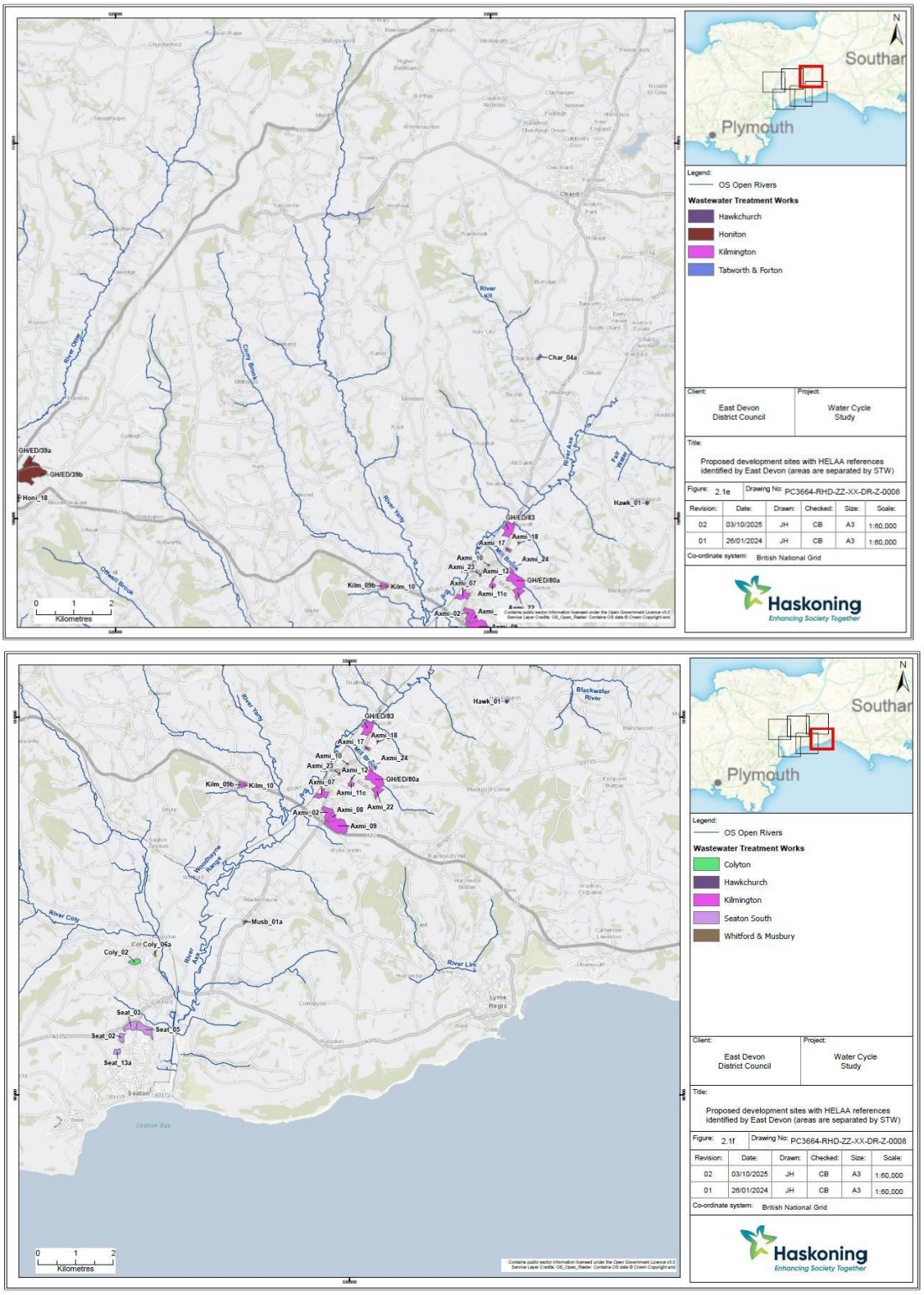


Figure 2.4: Proposed development sites with HELAA references identified by East Devon (areas are separated and coloured by which WwTW will serve the proposed developments)

Table 2.2: Proposed number of dwellings and associated STW (EDDC, 2025)

Asset Site Name/Description STW	Proposed allocations	Proposed New Community	Topsham	Total proposed dwellings
Colyton STW	61	-	-	61
Countess Wear (Exeter) STW	245	8000	596	8,841
Dunkeswell STW	43	-	-	43
Feniton STW	147	-	-	147
Fluxton (Ottery St Mary) STW	387	-	-	387
Hawkchurch STW	12	-	-	12
Honiton STW	848	-	-	848
Kilmington (Axminster) STW	1,109	-	-	1,109
Maer Lane (Exmouth) STW	1,586	-	-	1,586
Musbury & Whitford STW	22	-	-	22
Otterton STW	87	-	-	87
Seaton South East Devon STW	284	-	-	284
Sidmouth STW	215	-	-	215
Tatworth STW	30	-	-	30
Woodbury STW	269	-	-	269
Total	**5,345**	**8,000**	**596**	**13,941**

3 Legislative and Policy Framework

3.1 The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017

The EU Water Framework Directive 2000/60/EC (WFD) was transposed into English law through the Water Environment (WFD) (England and Wales) Regulations (2003/2015/2017) (WER). These remain in force following the UK's withdrawal from the European Union under the amendments presented in the Floods and Water (Amendment etc.) (EU Exit) Regulations of 2019.

The amended WER require a 'good ecological status' to be achieved in all surface freshwater bodies, i.e. having biological, chemical, and structural characteristics like those expected in nearly undisturbed conditions. Development proposals affecting the water environment may impact the biological, hydromorphological, physio-chemical and/or chemical quality elements. Impacts leading either to deterioration in the status of a water body or to the water body being unable to achieve its status objectives are unlikely to be permitted.

Under the WER, new developments must be assessed to identify if they will:

- Cause deterioration in water body status, or
- Lead to failures in achieving ecological objectives.

The South West River Basin Management Plan (RBMP) [[1]] details pressures facing the water environment and measures that need to be taken by all partners to meet the requirements of the directive in the region. Current levels of water abstraction are causing, or risk causing, environmental damage in various river catchments across East Devon. Measures have been identified in the RBMP to address this and have been allocated to the water companies for delivery through the Water Industry National Environment Programme (WINEP) for the period 2020 – 2025.

Most watercourses in East Devon are not in their natural state. Modifications such as channel straightening or dredging have taken place over centuries for reasons such as transport, urbanisation, land drainage, agriculture, and flood defence. In most cases, the watercourses in East Devon still serve these important purposes and hence channels cannot be returned to a more natural state. Such watercourses have been designated as heavily modified or artificial water bodies under the WER Regulations and are given the alternative objective of 'good ecological potential'.

Developers proposing large or industrial developments are strongly encouraged to liaise with the Environment Agency at an early stage in the planning process to gain further local information.

3.1.1 Assessment of developments

The duty to ensure that WER requirements are met by developers lies with the Environment Agency. Early engagement with the local planning authority (LPA), the Environment Agency and relevant water and sewerage companies can help to establish if water quality is likely to be a significant planning concern and, if it is, to clarify what assessment will be needed to support the application.

During the planning process a screening of the development is carried out by the LPA based on three issues, in this order of importance:

- Causing deterioration: Does the development have the potential to cause deterioration in the WER status of a water body? What is the expected impact of additional loads of treated sewage effluent?
- Preventing improvements: Does the development prevent future improvement to the water body and therefore prevent it from reaching good ecological status/potential?
- Protecting and enhancing: Are there opportunities for development to assist with protecting and improving the ecological status of water bodies and meeting WER objectives.

Where water quality has the potential to be a significant planning concern, an applicant should be able to explain how the proposed development would affect a relevant water body in an RBMP and how they propose to mitigate the impacts. Applicants should provide sufficient information for the LPA to be able to identify the likely impacts on water quality. The information supplied should be proportionate to the nature and scale of development proposed and the level of concern about water quality.

In those cases where it is likely that a proposal would have a significant adverse impact on water quality then a more detailed assessment will be required, alongside liaison with the water company. The water company will assess whether there is sufficient capacity within the existing infrastructure to accommodate foul flows from the site and within the sewerage catchment. If there is insufficient capacity to accommodate foul flows, then a detailed site wide Foul Water Drainage Strategy shall be submitted to and agreed in writing by the LPA. The strategy should include the phasing of such works and measures to prevent development proceeding ahead of capacity being available. Phasing recommendations based on treatment capacity and physio-chemical permits is discussed in this WCS within **Section 7.2**.

The assessment and drainage strategy should form part of the environmental statement if one is required because of a likely significant effect on water. Development which may require further assessment includes, but is not limited to:

- Development within 20 metres of a watercourse where changes are proposed to the channel or bank form or where the long-term management of the watercourse would be affected;
- Development requiring Environmental Impact Assessment (EIA) for reasons linked to the water environment;
- Where Water Recycling Centre (WRC)/ WwTW capacity is at or close to permitted dry weather flow (DWF) capacity;
- New water infrastructure; and
- Developments on contaminated land.

Deterioration can be mitigated and multiple benefits for people and the environment can be achievable through good design such as Sustainable Drainage Systems (SuDS), green infrastructure, and river restoration. For example, flood risk can be reduced, and biodiversity and amenity improved by designing development that includes permeable surfaces and other SuDS, removing artificial physical modifications and recreating natural features. Water quality can be improved by protecting and enhancing green infrastructure.

3.2 National Planning Policy Framework

A WCS is not a requirement of the NPPF. However, the NPPF states that strategic policies in development plan documents should make ‘sufficient provision’ for infrastructure for water supply and wastewater, and planning practice guidance states that a WCS can help in the preparation of a plan for sustainable growth.

3.2.1 Building Regulations and Optional Technical Standards

Between 2013 and 2014, the Government undertook a significant amendment to the existing Building Regulations, carrying out a Housing Standards Review followed by a Ministerial Statement on Building Regulations and related notes in March 2014. The initiative aimed to simplify government regulations and multiple local standards into one key set of ‘tiered’ standards in relation to Access, Security, Water, Energy and Space. Significantly, the Ministerial Statement proposed to introduce a new, tighter (Housing) Optional Technical Standard for water efficiency to be set at 110 litres/person/day (l/p/d) to replace the existing water consumption target of 125 l/p/d.

The NPPF enables LPAs to set out optional water efficiency requirements in a Local Plan, with the aim of improving efficiency standards for new development where it can be demonstrated there is a clear need. East Devon is within the SWW service area, which is classed as a **‘Not Serious’ water stress area** by the Environment Agency. For

the full methodology on the derivation of scores to determine the water stress classification, see Annex 1 of 'Areas of water stress: final classification' [2].

The second assessment focuses on water body stress. In East Devon, water bodies are classified as having '**low**' to '**medium**' stress. This means the pressure on the water environment—through activities such as abstraction, discharge, and storage management—is comparable to that observed across the wider service area outside of East Devon.

As of February 2021, the Environment Agency has been in the process of consultation to update the determination of water stressed areas in England. With a greater understanding of population growth, climate change and environmental requirements since the 2013 publication, the outcomes of the consultation and subsequent determination of water stressed areas may change the classification of the level of stress affecting East Devon's water bodies.

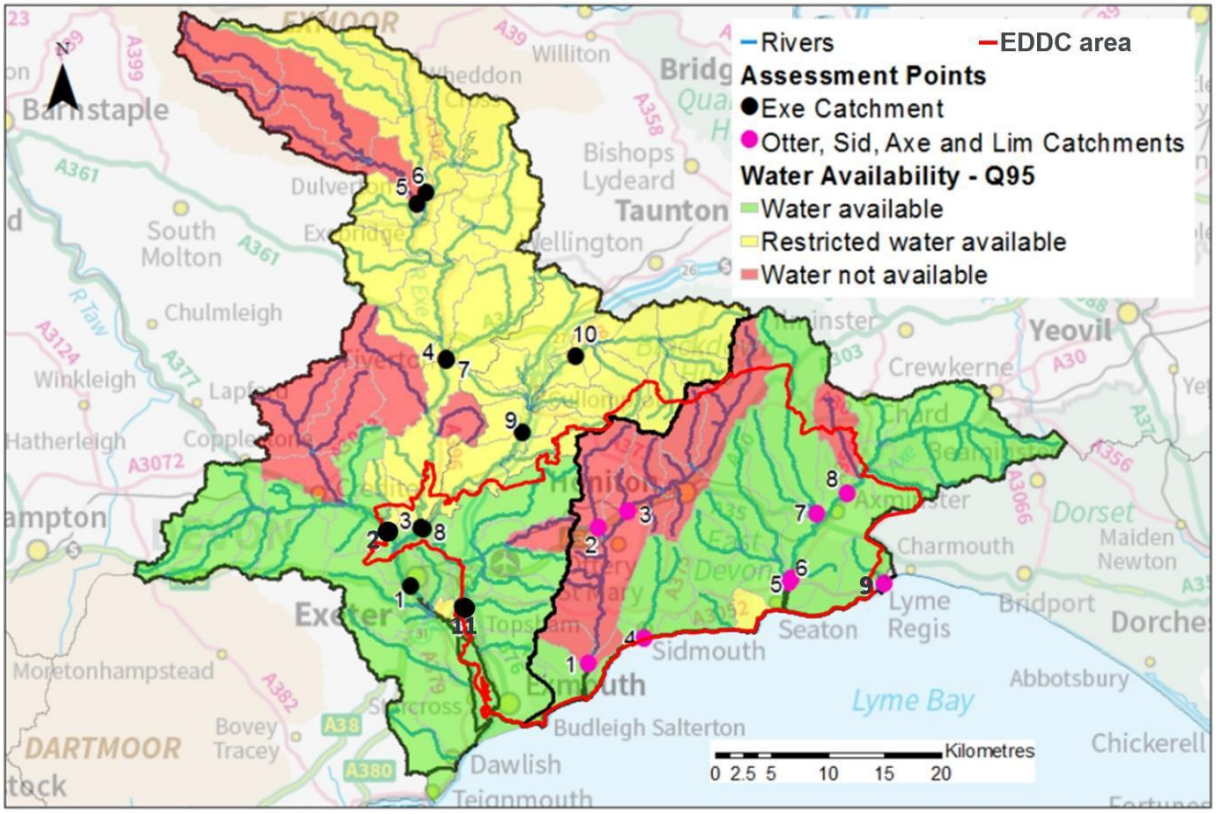
In addition, the Water Act 2003 (s.83) states that "in exercising its function and conducting its affairs, each public authority shall take into account, where relevant, the desirability of conserving water supplied or to be supplied to premises".

An investigation by the Environment Agency and the Energy Saving Trust found that as sustainable building standards are tightened in new homes, CO2 emissions from hot water use are likely to form a progressively larger component of overall household emissions and may eventually exceed emissions from heating the home. It also found that more efficient water use could contribute to lower CO2 emissions.

4 Water Resources and Supply

4.1 Introduction

The East Devon District is located within SWW's Supply Zone, of which they are responsible for the supply of potable water and treatment of waste/sewage for the entire catchment area. For this WCS, WwTW (sometimes referred to as WRC or STW) have been included in the assessment due to their growth relevancy to the proposed development sites. The entire East Devon district is encompassed by SWW's Wimbleball Water Resource Zone (WRZ) as seen as the black bordered area within **Figure 4.1** [3].



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Figure 4.1: Water source surface water availability at Q95 (low flow)

4.1.1 Catchment Abstraction Management Strategy (CAMS)

A Catchment Abstraction Management Strategy (CAMS) sets out how the Environment Agency will manage water abstraction in each catchment (e.g., the River Axe, Lim, Otter, and Sid catchments). CAMS documents describe where water is available for abstraction and the implications water resource availability has for new and existing water abstraction licences, and contributes to the objectives of the South West RBMP by:

- Providing a water resource assessment of rivers, lakes, reservoirs, estuaries, and groundwater;
- Identifying water bodies that fail the flow conditions expected to support good ecological status;
- Preventing deterioration of water body status due to new abstractions; and,
- Providing results which inform RBMPs.

4.1.2 East Devon Abstraction Licencing Strategy

The study area falls within the Otter, Sid, Axe, and Lim catchment and Exe catchment licensing strategy [3]. The characteristic flow regimes and drainage patterns give rise to several seasonal winterbournes which dry up for periods along some stretches. SWW abstracts significant volume of water for public water supply from groundwater sources in the upper and middle reaches. This strategy is set within the context of the water resources, pressures faced and the assigned designations. The aim is to ensure that RBMP objectives for water resources activities are met and deterioration within these combined catchments is avoided.

4.1.2.1 Surface water resource availability

The Environment Agency has assessment points along the relevant rivers to monitor flow at various times. Water resource availability is calculated by four different flow rates:

- Q95 - the flows which are exceeded on average for 95% of the time i.e., low flow.
- Q70 - the flows which are exceeded 70% of the time.
- Q50 – the flows which are exceeded 50% of the time i.e., median flows.
- Q30 – the flows which are exceeded 30% of the time i.e., higher flow.

Figure 4.1 shows water resource availability at Q95 for East Devon during dry weather periods. Environment Agency Assessment Points (APs) numbered 1 to 9 (and coloured pink) are in the Otter, Sid, Axe and Lim catchments within East Devon. The black points numbered 1 to 11 are from the Exe catchment (Exe APs 2, 3, 8, and 11 are within the East Devon catchment).

The categories of surface water resource availability status are shown in the **Table 4.1.** The classification is based on an assessment of a river system's ecological sensitivity to abstraction-related flow reduction [3]. The classification can later be used to assess the potential for additional water resource abstractions. The classification for each of the Water Resource Management Units (WRMU) in East Devon has been summarised for surface waterbodies in **Table 4.2**.

Table 4.1: Water resource availability status categories for surface water

Indicative resource availability status	License availability
Water available for licensing	There is more water than required to meet the needs of the environment. New licenses can be considered depending on local and downstream impacts.
Restricted water available for licensing	Full Licensed flows fall below the Environmental Flow Indicators (EFIs). If all licensed water is abstracted there will not be enough water left for the needs of the environment. No new consumptive licenses would be granted. It may also be appropriate to investigate the possibilities for reducing fully licensed risks. Water may be available if you can 'buy' (known as license trading) the entitlement to abstract water from an existing license holder, although it may be for reduced quantities.
No water available for licensing	Recently actual flows are below the EFI. This scenario highlights water bodies where flows are below the indicative flow requirement to help support Good Ecological Status (as required by the WER). No further consumptive licenses will be granted. Water may be available if you can buy (known as license trading) the amount equivalent to recently abstracted from an existing license holder. Any water rights trading proposal in these water bodies would need to demonstrate improvements in flow.

Table 4.2: Surface water resource availability classification for East Devon [3]

River – WRMU	Numbered location in Figure 4.1	Surface water (flow exceedance scenarios)			
		Q30 (Flow exceeded 30% of the time)	Q50 (Flow exceeded 50% of the time)	Q70 (Flow exceeded 70% of the time)	Q95 (Flow exceeded 95% of the time)
CAMS Area: Otter, Sid, Axe and Lim					
Otterton	1				
Fairmile	2				
Fenny Bridges	3				
Sidmouth	4				
Colyford	5				
Axe Bridge	6				
Kilmington	7				
Weycroft	8				
Lyme Regis	9				
CAMS area: Exe					
Trews Weir	1				
Cowley	2				
North Bridge	3				
Tiverton Exe	4				
Brushford	5				
Weir Bridge	6				
Tiverton Lowman	7				
Stoke Cannon	8				
Woodmill	9				
Uffculme	10				
Clyst St Mary	11				

Table 4.3: Description of East Devon surface water resources (Source; East Devon abstraction licensing strategy policy paper, Environment Agency, 2023)

River – WRMU	Description
Otterton	Downstream River Otter, downstream of Otterton Mill
Fairmile	River Tale, upstream of confluence with River Otter
Fenny Bridges	River Otter at Fenny Bridges
Sidmouth	Mouth of the River Sid
Colyford	River Coly, at its confluence with River Axe)
Axe Bridge	Downstream River Axe, upstream of Axe Estuary and confluence with River Coly
Kilmington	River Yarty, upstream of confluence with Corry Brook

River – WRMU	Description
Weycroft	River Axe, upstream of Axminster
Lyme Regis	Mouth of River Lim at Lyme Regis
Trews Weir	River Exe, at Exeter
Cowley	River Creedy, upstream of confluence with River Exe
North Bridge	River Exe, upstream of confluence with River Culm
Tiverton Exe	River Exe at Tiverton
Brushford	River Barle, upstream of confluence with River Exe
Weir Bridge	River Exe, upstream of confluence with River Haddeo
Tiverton Lowman	River Lowman at confluence with River Exe at Tiverton
Stoke Cannon	River Culm, at its confluence with River Exe
Woodmill	River Culm, to the south of Cullompton
Uffculme	River Culm, at Uffculme
Clyst St Mary	River Clyst, upstream of Exe Estuary at Topsham

4.1.2.2 Groundwater resource availability

Groundwater availability is a measure of how much groundwater is available for abstraction after the river flow requirements for ecology have been met. Groundwater availability inside the East Devon catchment area is determined by an assessment that considers:

- The recharges to that groundwater body.
- The groundwater contribution to rivers crossing that groundwater body.
- The flows needed to support ecology.

Figure 4.2 shows ground water resource availability at Q95 for East Devon during dry weather periods. The APs numbered 1 to 9 and coloured pink are in the Otter (south west of East Devon), Sid (south of East Devon), Axe and Lim catchment (east of East Devon). The black coloured points numbered 1 to 11 are from the Exe catchment (north west of East Devon). Exe assessment points 2, 3, 8 and 11 are within the East Devon catchment.

The resource availability for each groundwater body in the East Devon catchments is shown in **Table 4–5**, the colours have been classified using the criteria shown in **Table 4–4**.

Table 4.4: Groundwater resource availability status categories

Indicative resource availability status	License availability
Water available for licensing	Groundwater unit balance shows groundwater available for licensing. New licenses can be considered depending on impacts on other abstractors and on surface water.
Restricted water available for licensing	Groundwater unit balance shows more water is licensed than the amount available, but that recent actual abstractions are lower than the amount available **OR** that there are known local impacts likely to occur on dependent wetlands, groundwater levels or cause saline intrusions but with management options in place. In restricted groundwater units no new consumptive licenses will be granted. It may also be appropriate to investigate the possibilities for reducing fully licensed risks. Water may be available if you can 'buy' (known as license trading) the entitlement to abstract water from an existing license holder. In other units there may be restrictions in some areas, for example in relation to saline intrusion.
No water available for licensing	Groundwater unit balance shows more water has been abstracted based on recent amounts than the amount available. Further licenses will not be granted.

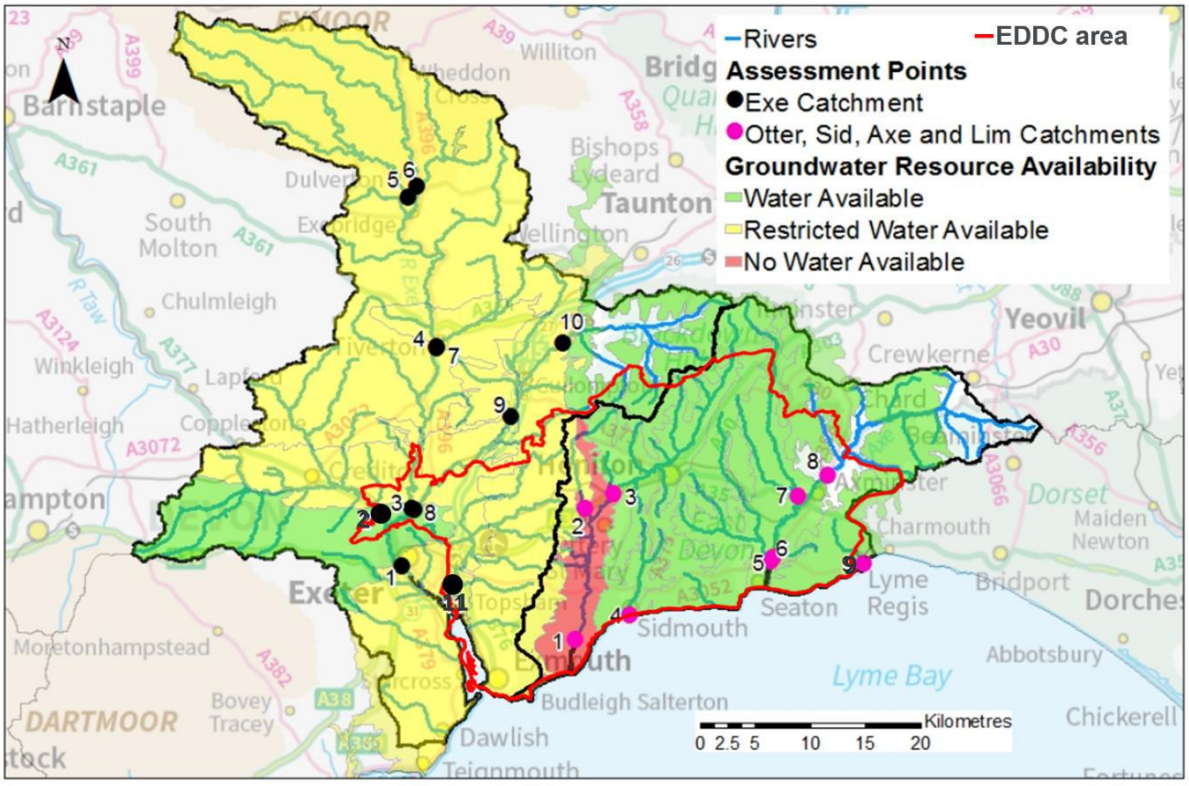


Figure 4.2: Groundwater availability at Q95 (low flow)

Table 4.5: Groundwater availability in East Devon [3]

River – WRMU	Numbered location in Figure 4.1	Groundwater availability
CAMS Area: Otter, Sid, Axe and Lim		
Otterton	1	
Fairmile	2	
Fenny Bridges	3	
Sidmouth	4	
Colyford	5	
Axe Bridge	6	
Kilmington	7	
Weycroft	8	Unproductive strata
Lyme Regis	9	
CAMS area: Exe		
Trews Weir	1	
Cowley	2	
North Bridge	3	
Tiverton Exe	4	
Brushford	5	
Weir Bridge	6	
Tiverton Lowman	7	
Stoke Cannon	8	
Woodmill	9	
Uffculme	10	
Clyst St Mary	11	

Otter Valley aquifer

The Otter Valley aquifer is the most important groundwater source in the East Devon catchments. The catchment is underlain by two key geological formations: the Otter Sandstone and the Budleigh Salterton Pebble Beds. These strata form the Otter Valley aquifer, which is hydrologically and hydrogeologically complex and yields significant quantities of groundwater. Because of this, it is heavily utilised by SWW for public water supply and plays a critical role in sustaining baseflow to the River Otter and its tributaries. Other geological formations in the East Devon area yield less groundwater but remain important for maintaining river flows and supporting smaller-scale abstractions, including private water supplies.

Due to current levels of abstraction, there is insufficient water in the River Otter to support wildlife during certain times of the year. Climate change projections, including changes in river flow and sea level rise, suggest increasing pressure on water resources, which is likely to exacerbate these ecological impacts.

To address these issues, the government-funded Lower Otter Restoration Project (LORP) was initiated in 2014 and completed in 2024 [4]. The project restored 55 hectares of salt marsh and mudflats, reconnecting the River Otter to its historical floodplain. This has enhanced the ecological value of the area for priority fish species such as seabass, mullet, and gobies, as well as wading birds including black-tailed godwit, oystercatcher, lapwing, and dunlin.

For the WCS, the Otter Valley groundwater model was used to assess groundwater availability within the Otter Valley Groundwater Management Unit. This approach ensures that the analysis reflects the characteristics of the aquifer system rather than the surface water features of the River Otter itself.

4.1.2.3 Status of groundwater bodies

A total of 15 groundwater bodies are wholly or partially present in the East Devon district, as defined in the RBMP [1] and set out on the Catchment Data Explorer. These groundwater bodies underlie 98% of the total catchment area and the quantitative status of each water body is summarised in **Table 4.6**.

A total of 208 licensed groundwater abstractions are currently authorised in the East Devon district. These licences authorise the abstraction of up to 27.4 million m^3 of groundwater per year. This is equivalent to approximately 10% the total licensed surface water abstraction, which, as noted in **Section 4.1.2.1**, relates to the catchments within East Devon.

Over the period of 2013 to 2018, approximately 16.9 million m^3 of groundwater was abstracted from the East Devon catchments per year. This is equivalent to 62% of the total licensed quantity of groundwater.

Table 4.6: Quantitative Status of Groundwater Bodies underlying East Devon District [5]

Water Body	Quantitative Status (overall)	Quantitative Dependent Surface Water Body Status	Groundwater Dependent Terrestrial Ecosystems	Saline Intrusion	Water Balance
Otter Valley (GB40801G801900)	Poor	Poor	Good	Good	Good
Blackdown Hills - Greensand (GB40801G802500)	Good	Good	Good	Good	Good
Central Devon and Exe - Aylesbeare Mudstone (GB40802G80180)	Good	Good	Good	Good	Good
East Devon - Greensand (GB40801G802400)	Good	Good	Good	Good	Good
Lyme Regis (GB40801G802600)	Good	Good	Good	Good	Good
Permian Aquifers in Central Devon(GB40801G801700)	Poor	Good	Good	Good	Good
River Yarty and Lower Axe - Mercia Mudstone (GB40802G803000)	Good	Good	Good	Good	Good
Sidmouth - Honiton,	Good	Good	Good	Good	Good

Water Body	Quantitative Status (overall)	Quantitative Dependent Surface Water Body Status	Groundwater Dependent Terrestrial Ecosystems	Saline Intrusion	Water Balance
Mercia Mudstone (GB40802G802800)					

4.1.2.4 Abstraction management

To maintain river flow the Environment Agency may restrict surface water abstraction by applying a hands- off flow (HoF) or hands off level (HoL) condition. When the river flow or river level measured at a specified point falls below the set value, abstraction must stop. A HoF or HoL is linked to an abstraction point (AP) using the most appropriate flow gauging station, and is dependent on the resource availability at that AP. New surface water licence applications are likely to receive new HoF restrictions depending on the AP. Currently at AP 1 – 3 of the Axe-Sid and Lim catchment, where there is no surface or groundwater availability at Q95, applications for new abstractions at low flow below Q70 will not be accepted.

4.1.3 Water Stress Classification for England and Wales

The Environment Agency and Natural Resources Wales have reviewed the current and future water usage and climate change scenarios, to provide an indicative water stress classification for areas in England and Wales. Water stress is defined as:

"…when the demand for water exceeds the available amount during a certain period or when poor quality restricts its use. Water stress causes deterioration of fresh water resources in terms of quantity (aquifer over-exploitation, dry rivers, etc.) and quality (eutrophication, organic matter pollution, saline intrusion, etc.)." [6].

High population density and high levels of demand increase the pressure on available supplies, as well as environmental factors such as local water resource availability.

Two assessments of water stress are undertaken. The first relates to the water companies' stress, in which the following criteria were used to determine the relative level of water stress for water company areas:

- Current per capita demand for water.
- Forecast growth in per capita demand for water.
- Forecast population growth.
- Current water resource availability.
- Forecast resource availability.

The Environment Agency states in the final classification (2021) on water stressed areas:

"Water stress applies both to the natural environment and to public water supplies. Both will be affected by climate change. Public water supplies are under pressure from reductions in abstraction to make them more environmentally sustainable. There is also a need to make public water supplies more resilient to droughts and meet additional demands associated with development and population growth" [2].

The water stress methodology provides an indication of relative water stress in individual water company areas by assessing the degree to which the resources in each water body within the area are exploited. There have been

two classifications on water stress for each supply area carried out by the Environment Agency. The first is water stress for 'metering' (consumer water meters) and the second is 'water body' stress [7].

Water companies are required to better manage the volume of water they supply, due to fresh water supplies coming under increasing pressure, especially in water stressed areas and due to higher demand in peak season, i.e., summer/drought. To manage this, water companies need to measure the volume of potable water supplied to each property with the aim to reduce the volume of water used and accurately inform on usage per person per day. Water meters installed in new property developments and retrofitted in older properties allow accurate data to be used.

The water bodies within East Devon are not classed as being under serious water stress [2]. This indicates that the level of stress placed on the water environment through abstraction, discharge and management of storage is not significantly high. However, population change, and development proposed in the Local Plan can still have an impact on the level of water stress for both the water company and the water bodies.

4.1.4 Water Resources Management Plan

Water companies are obliged to produce Water Resource management Plans (WRMPs) every 5 years, with the current plans by SWW drafted in 2024 [8]following OFWAT comments in the 2023 draft, setting out how the companies will maintain customer supplies over the period 2025 – 2050. The regulatory assessments show which companies have been identified as having sufficient supplies, within present legislation, to meet growth. They also show any strategic schemes that are needed to achieve this, along with reducing demands and leakage.

SWW's dWRMP of 2024 shows how the company plans to maintain the balance between water supplies and demand. It also provides robust justification for securing a tighter water efficiency standard and shows the water company's plans to meet the longer-term challenge of population increase, climate change and growing environmental need.

The dWRMP is the result of a comprehensive water resource planning exercise and consultation with stakeholders. Established cost-benefit and cost-effectiveness methods have been applied to assess supply- demand needs and the uncertainties regarding the future have been covered using target headroom allowances. The process allows identification of priority actions and to optimise economic and water resources.

4.1.4.1 South West Water's Priorities for 2050

In the dWRMP, SWW's pledge to put in place an overall strategic approach and vision for the next 25 years. This will form an essential basis on which to create sustainable plans for the future of the region with the challenge of meeting increasing demand and adapting to climate change whilst protecting the environment.

Long term governmental regulatory targets are outlined within the Environmental Improvement Plan [9] and the Environmental Targets (Water) (England) Regulations 2023 [10] These place a requirement on water companies to meet the following targets:

- Leakage reduction of 50% compared to the 2017/18 levels by 2050
- Reducing Per Capita Consumption (PCC) to 122 l/h/d by 2038 and 110 l/h/d by 2050 – this applies across all housing stock.
- Reduce non-household (i.e. commercial) use by 9% by 2038 and 15% by 2050.
- Reduction in Distribution Input (all water supplied) of 20% per head by 2038 from the 2019/20 baseline, with interim targets of 9% by 2027 and 14% by 2032.

4.1.4.2 West Country Water Resources Group (WCWRG) Regional Water Resource Plan

Sustainable goals were made in guidance with the West Country's Water Resources Group (WCWRG's) 2050 draft regional resources plan [11], which is the first ever regional water resources plan for the South West of England. As such, WCWRG Published their Water Resources West Final Regional Plan in June 2025. The WCWRG Regional WRMP will focus on these key aims:

- Meeting future resilience to water scarcity (increasing resilience to a 1 in 500-year drought).
- Securing future Public Water Supply (PWS) and non-PWS water needs.
- Ensure commitment to environmental improvements and environmental destination abstraction reduction.
- Develop scenarios that meet the adaptive target for a 50% reduction in leakage from the baseline and achieve water efficiency of 110 litres Per Capita Consumption by 2050.
- Ensure the regional plan meets the “must, could and should” aims of the Environment Agency's National Framework for Water Resources [12]. Key aims of the framework include ensuring resilient water supplies, tackling unsustainable abstraction, reducing demand, delivering new infrastructure, and enhancing nature-based solutions for a sustainable future.
- Produce a Regional Water Resource Plan that gives value for customers and provides additional benefits to customers and stakeholders.

4.2 Impact of development on water resources

4.2.1 Baseline supply-demand balance

Following the pandemic, water demand grew significantly in the South West. Previous predictions expected the growth to spread over the next 25 years, so this scenario has necessitated a rapid re-evaluation. It has been projected that the highest regional rate of growth in households will take place in the South West. Adequate water resources for households and non-household customers will have to be factored in for the additional 430,000 people that are expected to be living and working within the region by mid-2032.

The increase in population may require more land to be cultivated for crops, for livestock and irrigation needs. There are growing concerns and expectations of customers and the regulators that the landscape will be preserved and any future work carried out will not be detrimental, but beneficial to nature. This means more stringent targets will need to be met to minimise the effect of human development on the environment. There are targets imposed by the Government for its 25-year plan to 2050 which require the environment to be improved for future generations within a generation. This means water companies are to reduce leakage by half and PCC by a quarter [13]. Water companies are also required to have plans in place to reduce abstractions from rivers going forward to meet Government’s objectives. During periods of water stress and drought, this plan is to facilitate resilience and security of supply. Table 4–7 shows the current per PCC of the East Devon district based on the Wimbleball WRZ. The tables below correspond to the WRZ table summaries from the dWRMP [14] for the baseline supply-demand and the preferred final plan supply-demand scenario by SWW.

Table 4.7: PCC in the Wimbleball WRZ covering East Devon (Source: dWRMP SWW, 2023)

WRZ	PCC (2022/23)		
	Measured PCC (l/h/d)	Unmeasured PCC (l/h/d)	Weighted average (l/h/d)
Wimbleball	119.3	280.3	141.9

4.2.1.1 Baseline Dry Year Annual Average (DYAA)

Table 4.8 below correspond to the Wimbleball WRZ table summaries [14]. They show a forecast surplus of -8.93 Ml/d DYAA by the end of this Asset Management Plan (AMP) cycle and a continued deficit across the next five AMP cycles. Critical Period data has not yet been made available by SWW.

Table 4.8: Wimbleball WRZ baseline supply demand balance to 2050 for dry year annual average (DYAA) conditions (Deficits highlighted in red) (Source: dWRMP , SWW, 2023)

Category	2024-25 (end of AMP7)	2029-30 (end of AMP8)	2034-35 (end of AMP9)	2039-40 (end of AMP10)	2044-45 (end of AMP11)	2049-50 (end of AMP12)
Total DYAA Water available for use: Area sources* (Ml/d)	85.67	81.76	73.63	65.17	64.71	64.25
Net transfers into Area (Ml/d)	0	0	0	0	0	0
Total DYAA Water available for use: including transfers* (Ml/d)	85.64	81.73	73.6	65.14	64.68	64.22
Total DYAA Distribution Input (Ml/d)	90.87	91.95	92.8	94.85	97.10	99.30
Total DYAA Target Headroom (Ml/d)	0.52	0.54	0.58	0.59	0.64	3.06
DYAA supply-demand balance (Ml/d)	-8.93	-13.58	-22.3	-32.57	-35.34	-38.14

** Includes bulk imports, exports, and inter-zone transfers*

4.2.1.2 Preferred Final Plan DYAA

For Wimbleball WRZ the Final Plan Option put forward by SWW shows a forecast surplus of 1.72 megalitres per day (Ml/d) Dry Year Annual Average (DYAA) supply and demand balance by the end of this AMP cycle (**Table 4.9**). Wimbleball WRZs DYAA supply demand balance does not go into deficit across AMP cycles 8 – 12 in this Final Plan option.

Table 4.9: Wimbleball WRZ final supply demand balance to 2050 (DYAA conditions) (Source: dWRMP revised tables V5 SWW, 2023)

Category	2024-25 (end of AMP7)	2029-30 (end of AMP8)	2034-35 (end of AMP9)	2039-40 (end of AMP10)	2044-45 (end of AMP11)	2049-50 (end of AMP12)
Total DYAA Water available for Use* (Ml/d)	96.29	88.2	86.94	83.42	80.68	80.22
Total DYAA Distribution Input (Ml/d)	90.87	84.69	80.25	78.38	76.65	75.12
Total DYAA Target Headroom (Ml/d)	5.43	3.51	6.69	5.04	4.02	5.1
DYAA supply-demand balance (Ml/d)	1.72	0.15	3.59	2.18	1.11	2.04

** Includes bulk imports, exports, and inter-zone transfers*

4.2.2 Proposed strategy to address supply deficit

SWW's WRMP sets out a strategy for water resources which redresses the water supply deficit and allows sufficient additional capacity (referred to as 'headroom') for uncertainties in development and capacity. SWW's 2019 WRMP established a strategy aimed at enacting the appropriate measures at the ideal times.

SWW plan to adhere to it in their future operations. Nonetheless, it is acknowledged that any approach devised to address supply and demand discrepancies must also prioritise achieving specific outcomes that help manage potential risks in the future.

In the latest dWRMP, their strategy includes a significant investment in a thorough demand reduction program starting in AMP8 and extending into the future. This is to ensure that they meet the regulatory benchmarks related to leakage and PCC. They intend to resort to supply-side solutions only when the need for additional supply exceeds what can be achieved through demand management initiatives.

SWW long term strategies include:

- 50% Leakage Reduction by 2045 in both best value and least cost plans (5 years ahead of the mandatory 2050 target).
- Water Efficiency and Demand Management Activities to meet Environmental Improvement Plan (EIP) targets.
- Continuation of the rollout of smart metering.
- Use of Drought Permits and Restrictions to reduce reliance on drought options and water restrictions.
- Developing all options needed for an adaptive pathway, allowing adaptation at key monitoring points if necessary.

4.2.2.1 Supply side schemes

The dWRMP outlines the two main schemes that will be utilised to maintain the supply and demand within the Wimbleball WRZ.

Cheddar 2 Reservoir

The “Cheddar 2” transfer refers to a project currently in planning stages involving the creation of a new earth embankment reservoir adjacent to the existing Cheddar Reservoir in Somerset, outside of the East Devon District [15]. The project falls within wider plans from the West Country Water and Environment Group (WCWE) and is in partnership with Wessex Water and Bristol Water. Set to launch in July 2029, the project aims to enhance water supply to the Greater South West region and will have a useable capacity of 8,200 Ml. It is estimated to have a final cost of £1 billion with a projected completion date for operation of 2035. The reservoir will be fed by Cheddar Springs and the River Axe (Somerset) utilising Bristol Water’s existing licenses. It will increase water resource resilience and as a result of new strategic pipelines, it will provide up to 20 Ml/d of benefit to the Wimbleball WRZ in summer and ensures supplies are resilient to a 1 in 500-year drought.

Whitecross Distribution Scheme

The Whitecross distribution scheme allows more water to be transferred into the East Devon catchments from the River Exe. The scheme represents a new main allowing 5 Ml/D of additional water from Pynes Water treatment works (located on the River Exe) to offset any deficit in the future production capabilities of Dutton water treatment works (located on the River Otter). Dotton WwTW is subject to potential license changes in order to reduce the levels of abstraction in the River Otter catchment which will restore the catchment to a sustainable abstraction position (see **Section 4.1.2.2**). The scheme is expected to be operational by 2030.

4.2.3 Other potential water resources issues

Although this document predominantly considers potable water supply, other water resource issues within the study area should also be considered, such as agricultural use, navigation, amenity, and biodiversity.

Whilst it is recognised that agriculture, navigation, and tourism are not likely to significantly impact on the larger “growth” issues, the study area is likely to remain primarily agriculturally based for the foreseeable future, and will therefore, create employment and contribute to the economy. Navigation and tourism have employment and economic benefits on a smaller scale.

Regarding the future water demands there is potential to support agricultural water demands through innovative and sustainable water management approaches. These include:

- SuDS attenuation: SuDS are designed to manage surface water runoff in a way that mimics natural drainage processes. In agricultural settings, SuDS features such as swales, retention ponds, and infiltration basins can temporarily store excess rainwater. This stored water can then be reused for irrigation or livestock, reducing reliance on mains water or groundwater abstraction [16].
- Rainwater harvesting: This involves collecting and storing rainwater from roofs or other surfaces for later use. On farms, harvested rainwater can be used for crop irrigation, cleaning equipment, or watering livestock. It is a low-cost and low-energy solution that can significantly reduce demand on potable water supplies, especially during dry periods [17].
- Greywater supply: Greywater refers to lightly used water from sinks, showers, and washing machines (excluding toilet waste). With appropriate treatment, greywater can be reused for non- potable purposes such as irrigation. In agricultural contexts, this could involve diverting treated greywater from nearby developments or facilities to support local farming operations [18].

By integrating these approaches into new developments or retrofitting them into existing infrastructure, the region can reduce pressure on potable water sources and improve resilience to climate variability. These measures also align with broader sustainability goals and can contribute to improved water security for both agricultural and ecological needs.

Increasing population and a changing climate will have an impact on water resources in the future. Water resources are limited across the district and need to be managed and used effectively to meet the needs of people and the natural environment. Water efficiency measures play a key role in reducing demand on water resources and accommodating growth in business, housing, and population requirements without the need to increase overall consumption. Drivers for water efficiency include delivery of the objectives of the WER; reducing pressure on wastewater treatment capacity; adapting to the impacts of climate change; and reducing domestic energy use.

4.2.4 Impact of climate change on water resources

Work carried out by the UK Climate Impacts Programme predicts that winter rainfall will increase and summer rainfall will decrease in the future [19] . In addition, increasing temperatures will reduce the length of the winter recharge season and increase demand on the water supply. Although this research is high-level and does not appear to be specific to any location within East Devon, it is relevant because of the water abstractions within the district which are recharged by rainfall. South West Water's dWRMP takes account of climate changes and the preferred Final Plan DYAA (**Section 4.2.1.2**) includes the impacts from climate change.

4.2.5 Per Capita Consumption

The Building Regulations 2010 [20] are a set of legal requirements for construction and alteration of buildings in England and Wales. There are Approved documents with guidance on how to meet the requirements in the Building Regulations. Approved document G of the Building Regulations 2010 places a mandatory requirement for total water consumption in all new homes in England and Wales to be limited to 125 litres per person per day. The approved document G also provides details of an additional 'optional requirement' that places a lower consumption limit of 110 l/h/d. The optional requirement can be implemented through local policy where there is a clear evidence need. Details of the maximum water consumption that must not be exceeded for different types of fittings (e.g. toilets, taps, showers etc.) are provided in the section G2 of the approved document G.

The Environmental Improvement Plan (2023) [21] is the Department for Environment, Food & Rural Affairs (Defra) first revision to the 25 Year Environment Plan (2018). The plan sets out the actions on water efficiency in new developments to be delivered over a 10-year period. Action 7 states the following:

"Review the Building Regulations 2010, and the water efficiency, water reuse and drainage standards (regulation 36 and Part G2, H1, H2, H3 of Schedule 1), considering the competence and skills to enable this transition. We will encourage the use of a fittings-based approach linked to the water efficiency label. We will consider a new standard

for new homes in England of 105 l/h/d and 100 l/h/d where there is a clear local need, such as in areas of serious water stress."

In a written ministerial statement from 19th December 2023 [22], the Secretary of State for Levelling Up, Housing and Communities stated that:

"in areas of serious water stress, where water scarcity is inhibiting the adoption of Local Plans or the granting of planning permission for homes, I encourage local planning authorities to work with the Environment Agency and delivery partners to agree standards tighter than the 110 litres per day that is set out in current guidance".

As such, there are likely to be some future changes to the water efficiency guidance following recognition of the need to achieve an efficiency beyond the current Building Regulations, particularly in areas of serious water stress.

South West Water's dWRMP sets out the government target to achieve a PCC of 110 l/h/d across all housing stock by 2050. As such, South West Water have outlined the role of new dwellings in reducing the overall average consumption.

To minimise the impact on the water environment, the Council should consider a PCC policy to achieve the Optional Technical Housing Standard of 110 l/h/d. The evidence presented in **Section 0** provides the evidence for adopting the stricter standard of 110 l/h/d in East Devon to address water stress.

4.3 Summary

East Devon lies within SWW's Wimbleball Water Resource Zone, responsible for potable supply and wastewater treatment. The CAMS and Abstraction Licensing Strategy guide sustainable water use across Otter, Sid, Axe, Lim, and Exe catchments, balancing ecological needs with abstraction.

Surface water availability is assessed using Q95 (low flow) and other flow indicators. At Q95, many catchments—including Otter, Sid, Axe, and Lim—have little or no water available for new abstractions. In the Axe-Sid and Lim catchments (APs 1–3), where availability is critically low, applications for new abstractions below Q70 are refused. Future licences will include stricter conditions, particularly during low- flow periods. Climate change and population growth are expected to further increase pressure on these limited resources.

Groundwater is vital for the water resources in East Devon, especially the Otter Valley aquifer, which is heavily used for public supply and river baseflow by SWW. Current abstraction pressures and climate change increase ecological risk, that have prompted prior restoration projects like the Lower Otter Restoration Project (LORP, 2014–2024).

SWW's DWMP (2024) and the WCWRG Regional Plan aim to secure long-term resilience, reduce leakage by 50%, achieve 110 litres per capita consumption by 2050, and adapt to drought and environmental challenges. Within SWW's plan they also aim to secure future water supply by developing new infrastructure such as the Cheddar 2 reservoir and optimise groundwater use, protect the environment by reducing unsustainable abstraction and implementing nature-based solutions like floodplain restoration, and adapt to climate change by ensuring long-term sustainability while meeting population growth and environmental obligations.

5 Wastewater Collection, Treatment and Water Quality

5.1 Wastewater infrastructure

5.1.1 Legislative drivers

5.1.1.1 Water Industry Act 1991

Water Supply and wastewater services in England and Wales were privatised in 1989. Following this, the Water Industry Act 1991 (HM Government, 1991) set out the Main powers and duties of water and sewerage companies, replacing the powers set out in the Water Act 1989. The Act covers the following:

- Responsibilities for ensuring water quality
- The provision of sewerage services – including the management of public sewers and the treatment of sewage
- Regulating discharges from public sewers
- Ensuring proper management of wastewater

Under Section 37 of the Water Industry Act 1991, water companies have a duty to "maintain, improve, and extend" their water supply networks to account for future water needs. Additionally, water companies are required to undertake long-term resource planning. Where water companies have capacity concerns, they should work with developers and Local Authorities to ensure upgrades are delivered in line with the needs of the new developments. Planning conditions are a mechanism which can be used to ensure infrastructure need are met. The Act also establishes Ofwat as the economic regulator of the water industry.

5.1.1.2 Urban Waste Water Treatment Regulations 1994

The Urban Waste Water Treatment Regulations (England and Wales) 1994 (UWWTR) aim to protect the environment from the adverse effects of untreated urban wastewater. The main requirements of the regulations are:

- The establishment of systems to collect wastewater from urban 'agglomerations' (towns and cities)
- The secondary treatment of collected wastewater
- The identification of sensitive areas (for example, areas susceptible to eutrophication)
- More stringent treatment of wastewater discharged to sensitive areas

The regulations implement the European Union Urban Waste Water Treatment Directive (91/271/EEC).

5.1.1.3 Environment Act 2021

The Environment Act 2021 introduces new measures to address wastewater and sewage discharges. The measures are broken down into three key areas:

- **Enhanced monitoring of wastewater discharges** – water companies are required to continuously monitor the quality of watercourses upstream and downstream of their wastewater assets (e.g. wastewater treatment works and storm overflows). This will allow water companies to assess the impact of their discharges on the receiving watercourse. The statutory duty does not apply to coasts and lakes but does apply to transitional waters (e.g. estuaries).
- **Addressing the impact of storm overflows** – the Act places new duties on water companies to reduce the environmental and public health harm caused by storm overflows. Water companies are mandated to report the details of storm overflow discharges, including the location, frequency and duration.
- **Reducing wastewater pollution** - The Act introduced a target to reduce phosphorus from treated wastewater by 80% by 2038, with an interim target of 50% to be achieved by January 2028, against a

2020 baseline. This aims to deal with nutrient pollution caused by the water industry, which is a major contributor for poor water quality and ecological failures in freshwater environments.

5.1.1.4 Drainage and Wastewater Management Plans

The legislation drivers for Drainage and Wastewater Management Plans (DWMPs) were first included in the Water Industry Act 1991 and were subsequently made a statutory requirement in the Environment Act 2021. DWMPs are used for long-term strategic planning that assess the current and future risk to drainage and wastewater systems. The aim of the plans is to ensure resilience and capacity of the drainage and wastewater networks. They also inform future investment decisions during the price review process (Figure 5.1).

5.1.1.5 Water Industry National Environment Programme

The Water Industry National Environment Programme (WINEP) for AMP8 and Price Review 2024 outlines a set of environmental actions that water companies in England must undertake between 2025 and 2030. The previous AMP7 ran from 2020 to 2025. WINEP sets out actionable projects and initiatives informed by the Water Industry Strategic Environmental Requirements (WISER) in 2022 [23]. The legislation informing the requirements include the Environment Act 2021 [24] and the WER 2017 [25].

SWW published its business plan for 2025 – 2030 in October 2023. The purpose of the business plan is to identify improvements and investments. Ofwat published its draft decisions in July 2024 [26], and the final determinations were provided for SWW in April 2025 [27].

5.1.2 Sewerage and wastewater treatment catchment

SWW's DWMP establishes a strategy for upgrading the region's drainage and wastewater treatment systems, marking a pathway for future infrastructure investments. The foundational step in developing the DWMP is the risk-based catchment screening (RBCS) that assesses each sewer catchment against a set of 17 indicators set out in guidance by Water UK in 2018 [28]. The guidance categorises and measures the level of current and/or potential risk or vulnerability in the sewer catchment to future changes from developments or climate change. This assessment is used to determine if a sewer catchment progresses onwards to the Baseline Risk and Vulnerability Assessment (BRAVA) stage of the DWMP. It is from these 17 indicators that the specific planning objectives for each catchment is derived. How these indicators and policies are used to make a pathway for future investment is summarised in **Figure 5.1**. Although each indicator is of high importance to informing further assessment, three indicators are ranked as higher priority (known as Tier 2) indicators:

- Indicator 1: Catchment characterisation
- Indicator 3: Continuous or intermittent discharges impact upon other sensitive receiving waters (Part A)
- Indicator 4: Continuous or intermittent discharges impact upon other sensitive receiving waters (Part B)

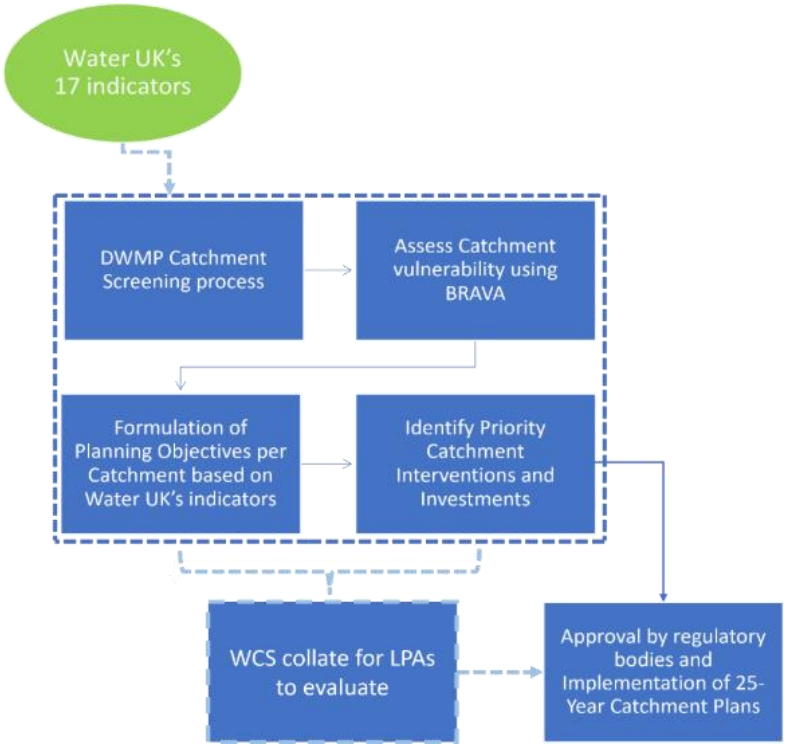


Figure 5.1: DWMP process to the implementation of 25-year catchment plans. Processes within the dark dashed square indicate actions water companies will have had to undertake. Light blue dashes indicate processes, inputs and outputs from outside of water companies

The management plans are split into catchment areas. For East Devon, the information regarding the region's drainage and wastewater treatment is split between the Axe, Sid and Lim DWMP and the Otter DWMP. The planning objectives (POs), and options to fulfil them, are evaluated by SWW for each sewage and wastewater treatment catchment. Through the BRAVA process, SWW's understanding of the risks facing the catchments, and at what scale and complexity, has been improved. This included an assessment into how external changes in the future may impact upon SWWs catchment vulnerabilities and how they may be impacted by risks such as Climate Change and Urban Creep. The outputs from this process were compared against six POs. The Tactical Planning Units (TPUs), which refers to specific WwTW and its corresponding catchment areas were split into the relevant catchment areas for East Devon. This included the STWs of Colyton, Feniton, Fluxton, Honiton, Kilmington, Hawkchurch, Seaton South and Woodbury. The indicator vulnerability to future changes (**Table 5.4**) and POs (**Table 5.3)** for these catchments are summarised below.

Table 5.1: RBCS Indicators of risk in sewer catchments (Source: Water UK, 2018)

Indicator No.	Indicator	Description	Criteria for the indicator to flag as a concern and needing further investigation in the BRAVA stage
1	Catchment Characterisation	This provides a mechanism to understand the vulnerability of the sewer catchment to sewer flooding because of an extreme wet weather event (defined as a 1-in-50-year storm event).	Catchment vulnerability score = 4 or 5 (i.e. the most vulnerable or sensitive to a one in 50-year storm)

Indicator No.	Indicator	Description	Criteria for the indicator to flag as a concern and needing further investigation in the BRAVA stage
2	Intermittent discharges impact upon bathing or shellfish waters	This is a mechanism to understand the significance of any impact of water company operations on bathing or shellfish waters.	Exceeding the permitted number of spills in each bathing water season, or per annum for shellfish waters.
3	Continuous or intermittent discharges impact upon other sensitive receiving waters (Part A)	This mechanism is to understand the significance of any impact of water company operations on sensitive receiving waters not addressed by other indicators.	'Remedy' on Natural England's Designated Sites system (associated with freshwater pollution discharges or freshwater drainage).
4	Continuous or intermittent discharges impact upon other sensitive receiving waters (Part B)	A mechanism to understand the significance of any impact of water company operations on sensitive receiving waters not addressed by other indicators.	'Threat' on Natural England's Designated Sites system (associated with water pollution).
5	Storm Overflow Assessment Framework	This considers the current / potential future activity to identify and address high spilling storm overflows.	If spill frequency investigation triggers are likely to be crossed within next five years.
6	Capacity Assessment Framework (CAF)	The measure provides an indication of capacity constraints in the sewer network. There are accepted issues around the confidence in outputs from the Initial CAF model which does not include for surface water inputs.	When categorised as 4 or 5 (due to performance, in full or part, within the catchment) will progress to the next stage of the process.
7	Internal sewer flooding	This is a common performance commitment by water companies to reduce flooding inside customer properties. It is a historical measure that records the number of internal flooding incidents per year, and it is indicative of capacity constraints within the sewer network.	The number of incidents is more than one in total over the last three years (and other specific criteria depending upon size of sewer catchment).
8	External sewer flooding	This is a common performance commitment by water companies to reduce flooding within the external curtilage of customer properties. It is a historical measure that records the number of external flooding incidents per year and is indicative of sewer capacity constraints.	The number of incidents is more than 10 in total over the last three years (and other specific criteria depending upon size of sewer catchment).
9	Pollution incidents (categories 1, 2 and 3)	This is a historical measure that identifies incidents of unexpected release of contaminants that have resulted in environmental damage. Categorised in	For any of the previous three years data, a category 1 or 2 pollution incident has occurred.

Indicator No.	Indicator	Description	Criteria for the indicator to flag as a concern and needing further investigation in the BRAVA stage
		accordance with the 2017 definition in the Environmental Performance Assessment (EPA).	
10	WwTW quality compliance	This is a historical measure relating to the performance of the WwTWs.	In any of the previous three years, the WwTW discharge has been confirmed as failing and was included as such in the calculation of overall permit compliance.
11	WwTW DWF compliance	This is a historical measure of compliance with DWF permits at WwTWs.	Has the Q90 of the measured yearly flows exceeded the DWF permit condition on two consecutive years in the last five years? Or is the works at risk of exceeding its flow permit conditions?
12	Storm overflows	A measure that focuses on using available data to examine permit risks that have not been captured by other indicators (e.g. pass forward flow conditions).	Is there evidence to Indicate that over the last three years any overflow is not operating in accordance with permit conditions?
13	Risks from interdependencies between Risk Management Authority (RMA) drainage systems	A mechanism to understand risk posed by interdependencies / interactions between other RMA drainage systems in the catchment.	Where it is considered that significant risks arise from interaction with other RMA drainage systems / receiving waterbodies.
14	Planned residential new development	A measure to understand the risks from forecast residential population growth in the sewer catchment.	Planned residential development is greater than thresholds set out in the guidance.
15	WINEP	The WINEP sets out the actions that water companies need to complete to meet their environmental obligations. Where there are specific WINEP drivers it is considered necessary that a long-term approach to managing the issues is developed.	Known WINEP drivers impacting the specific Level 3 catchment.
16	Sewer collapses	This is a historical measure that identifies risks to the integrity of the sewer system.	Sewer collapses are more than two per year in any of the preceding three years
17	Sewer blockages	This is a historical measure that records obstructions in a sewer (that require clearing) which causes a reportable problem (not caused by hydraulic overload), such as flooding or discharge to a watercourse, unusable sanitation, surcharged sewers or odour.	If the number of blockages (normalised by sewer length) in any of the preceding three years is greater than the company average.

Table 5.2: RBCS indicator categories and associated risk and vulnerability criteria (Source: South West Water- River Based Catchment study Axe-Lim, Otter and Sid)

RBCS indicator categories	Risk and Vulnerability criteria
	No indicators are flagged. This implies that there is no current evidence to suggest that the sewer catchment is likely to be vulnerable to changes in the future.
	If two or more indicators are flagged of this colour (excluding sewer collapses and blockages) then a BRAVA is required to identify whether and to what extent changes in future inputs impact on planning objectives.
	If one or more indicators are flagged in this colour (again, excluding sewer collapses and blockages) then a BRAVA is required.

Table 5.3: Planning Objectives for SWW's DWMP (Source; dWRMP South West Water 2023)

ID	Planning Objectives	How Objective is Measured	Regulatory Driver
PO1	Internal Flooding	Risk of sewer flooding in a 1 in 50-year storm – this is a severe storm that is likely to occur once in every 50 years or, put another way, has a 2% chance of happening in any 12-month period	Flood and Water Management Act, 2010
PO2	Pollution Risk	Storm overflow performance – this is non-compliance of a storm overflow with the permit issued by the Environment Agency which specifies the amount, frequency and concentration allowed to be discharged into the receiving water	Environment Act, 2021
PO3	Sewer Collapse	Risk of WwTW quality compliance failure – this is non-compliance of a WwTWs with its permit	Water Industry Act, 1991
PO4	Risk of Sewer Flooding in 1 in 50 Years	Internal sewer flooding risk – which is internal flooding of a domestic or business premises by wastewater	Resilience metric (obligation under the Flood and Water Management Act 2010)
PO5	Storm Overflow Performance	Pollution risk - pollution from any wastewater source on land or in water	Environment Act, 2021
PO6	Risk of WwTW Compliance Failure	Sewer collapses risk.	The Urban Wastewater Treatment Regulations, 1994

Table 5.4: Indicator to vulnerability assessment. As highlighted in Table 5–2; Green indicates no current vulnerabilities however, for each WwTW if two or more indicators are flagged yellow, which suggests there is a moderate risk of failure for that indicator, and/or there is a single red RAG score for any indicator, for where there is a high risk, means that a BRAVA assessment is necessary to assess the implications of these vulnerabilities on planning objectives for that WwTW. (Source; dWRMP SWW, 2023)

Indicator	TPUs at relevant WwTW to East Devon														
	Axe-Sid-Lim River Catchments WwTW							Otter River Catchments WwTW				Exe River Catchments WwTW			
	Colyton	Kilmington	Sidmouth	Seaton South	Hawk-church	Tatworth	Musbury &Whitford	Feniton	Fluxton	Honiton	Otterton	Countess Wear	Dunkeswell	Maer Lane	Woodbury
1															
2															
3															
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16															

Indicator	TPUs at relevant WwTW to East Devon														
	Axe-Sid-Lim River Catchments WwTW							Otter River Catchments WwTW				Exe River Catchments WwTW			
	Colyton	Kilmington	Sidmouth	Seaton South	Hawk-church	Tatworth	Musbury &Whitford	Feniton	Fluxton	Honiton	Otterton	Countess Wear	Dunkeswell	Maer Lane	Woodbury
17															

5.1.2.1 Axe-Sid-Lim River Catchments

Based on the indicator vulnerability assessment it is shown that the seven association STWs are vulnerable to nine of the 17 indicators; 1, 2, 5, 8, 9, 12, 14, 16 and 17 **Table 5.1**. Some Indicators are paired with one of the six relevant PO set out by SWW (**Table 5.3**), that can include options that can be undertaken to address an indicator at specific locations within the catchment:

- Indicator 1 (catchment characterisation) aligns with PO1 in addressing the risks of severe flooding from rare extreme weather events.
- Indicator 5 (storm overflow) ties into PO5's aim on improving storm overflow performance and reduce
- the amount of pollution from wastewater resources.
- Indicator 8 (external sewer flooding) is linked within PO4's aims of reducing risk of sewer flooding over the next 50 years and PO6 Risk of WwTW compliance failure that looks to reduce the sewer collapse risk.
- Indicator 9 (pollution incidents) ties into PO5's aim to minimize environmental pollution from the water company's operations.
- Indicator 12 (storm overflows) also supports PO5 by ensuring compliance with regulations to prevent pollution.
- Indicator 16 (sewer collapses) is linked to PO6 Risk of WwTW compliance failure that looks to reduce the sewer collapse risk.

5.1.2.2 River Otter Catchment

Based on the indicator vulnerability assessment it is shown that the seven association STWs are vulnerable to 10 of the 17 indicators; 1, 5, 6, 7, 8, 9, 12, 14, 16 and 17 (**Table 5.1**). Some Indicators are paired with one of the six relevant PO set out by SWW (**Table 5.3**), that can include options that can be undertaken to address an indicator at specific locations within the catchment:

- Indicator 1 (catchment characterisation) aligns with PO1 in addressing the risks of severe flooding from rare extreme weather events.
- Indicator 5 (storm overflow) ties into PO5's aim on improving storm overflow performance and reduce
- the amount of pollution from wastewater resources.
- Indicator 7 (internal sewer flooding) correlates with PO4, using historical flooding data to inform flood risk prevention strategies within properties.
- Indicator 8 (external sewer flooding) is linked within PO4's aims of reducing risk of sewer flooding over the next 50 years and PO6 Risk of WwTW compliance failure that looks to reduce the sewer collapse risk.
- Indicator 9 (pollution incidents) ties into PO5's aim to minimize environmental pollution from the water company's operations.
- Indicator 12 (storm overflows) also supports PO5 by ensuring compliance with regulations to prevent pollution.
- Indicator 16 (sewer collapses) is linked to PO6 Risk of WwTW compliance failure that looks to reduce the sewer collapse risk.

5.1.3 Investments Into Axe, Sid, Lim, and River Otter Catchments

For SWW investment context, The Environment Agency advised various partners to update the National Coastal Erosion Risk Map (NCERM) by the end of 2023. SWW will align with the ongoing revision of the 20 Shoreline Management Plans, as well as other projects by the Environment Agency and DEFRA aimed at refining flood and coastal erosion risk maps, models, and assessments. This comprehensive effort will generate vital data and evidence to guide future coastal adaptation strategies and planning for investment decisions by relevant coastal RMAs.

SWW's current investment strategy involves continuing to assess risks during AMP8 (2025 – 2030), following the release of the revised NCERM. AMP8 water usage reduction investments will include upgrading a third of water treatment infrastructure under SWW jurisdiction, as well as increasing connectivity between key reservoirs, increasing resilience.

Through future investment, SWW plan to reduce leakage across its network by 10% during AMP8 and tackle storm overflow; with a particular focus on improving beach quality in the region. Although some components have been fast tracked in 2022 when DEFRA introduced an accelerated delivery plan to incorporate planned aspects of AMP8 into the earlier AMP7 (2020 – 2025), including smart metering and free customer supply-pipe leakage repairs.

5.1.4 Wastewater treatment capacity

SWW has an adaptive strategy to manage growth uncertainty. The capacity risk assessment process for WwTW is undertaken on an annual basis, to ensure investment is continually prioritised. Once potential developments and expected build rates per site are established and adopted in the Local Plan, a detailed assessment of the long-term required infrastructure upgrades regarding WwTWs can be undertaken.

The permitted and measured DWF for each WwTW are provided in **Table 5.5**, these include WwTW outside of East Devon which are responsible for discharges within East Devon. The Q80 is the average value exceeded by 80 percent of all daily measured flows. Should a site be non-compliant, investigations are undertaken to identify the cause and remedial actions where appropriate.

The sewer capacity is influenced by flow rates, root ingress, misconnections, infiltration, silt and the build-up of fats, oils, and greases. Capacity assessment levels are calculated off the percentage permitted DWF in use after factoring in the headroom against the actual DWF.

The current existing flows, without proposed growth, are shown in **Table 5.5**. Using the 3-year average Q80 flow as the Actual DWF provided by SWW, four of the 15 WwTW that are expected to have development growth are currently exceeding, including Feniton, Fluxton, Honiton and Woodbury. Four are currently within 10% of exceeding their capacity. This includes Colyton, Countess Wear, Maer Lane, Seaton South and Otterton. Of the 15 WwTW only Hawkchurch and Musbury & Whitford have over 40% of the permitted DWF available for use, while there is also considerable capacity (over 20%) at Tatworth and Kilmington.

*Table 5.5: East Devon WwTW locations and existing flow data. *Hawkchurch DWF is based on prior 2023 flow data from SWW (Source: DWMP Flow Capacity SWW, 2025)*

WwTW	Receiving watercourse	3-year average DWF Q80 (m3/d)	Permitted DWF	WwTW	Receiving watercourse	3-year average DWF Q80 (m^3/d)
Colyton	River Axe	762	783	21	97	Less than 10%
Countess Wear	River Exe	36,239	40,486	4247	90	Less than 10%
Dunkeswell	River Otter	272	314	42	87	Less than 20%
Feniton	Vine Water (Flows to River	415	400	-15	104	Exceeding

WwTW	Receiving watercourse	3-year average DWF Q80 (m3/d)	Permitted DWF	WwTW	Receiving watercourse	3-year average DWF Q80 (m^3/d)
	Otter)					
Fluxton	Fluxton Stream (Flows to River Otter)	1,858	1,620	-238	115	Exceeding
Hawkchurch	Fair Water (Flows to Blackwater River)	n/a* Assumed 35	65	30	54	Over 40%
Honiton	River Otter	4,539	3,115	-1424	146	Exceeding
Kilmington	River Axe	1,691	2,226	535	76	Over 20%
Seaton	River Axe	2,452	2,493	41	98	Less than 10%
Maer Lane	Tidal Exe	10,805	11,825	1020	91	Less than 10%
Musbury & Whitford	River Axe	142	285	143	50	Over 40%
Sidmouth	River Sid	5,143	6,331	1188	81	Less than 20%
Tatworth	Forton Brook	632	937	305	67	Over 20%
Otterton	River Otter	1,524	1,643	119	93	Less than 10%
Woodbury	Polly Brook	427	408	-19	105	Exceeding

5.1.5 Existing water quality

Water quality can be affected by new development due to point source and/or diffuse pollution:

- Point source pollution enters a water body at a specific location and is generally readily identified. Potential point sources of pollution include discharges of effluent from STWs and combined sewer outfalls, discharges from industrial sites, and leachate from landfill sites.
- Diffuse pollution cannot be attributed to a precise point or incident but is the cumulative effect of activities over a large area, including agriculture, construction, road runoff and domestic misconnections to the surface drainage network. It is often difficult to identify specific sources of such pollution and therefore take immediate action to prevent it.

5.1.5.1 Water Environment Regulations: water body status

For the purposes of the WER, the overall classification of a water body is based on both Ecological status and Chemical status (see Appendix B for further details of assessment criteria):

- **Ecological status** is an assessment of the quality of water ecosystem, and shows the influence of pressures (e.g., pollution and habitat degradation) on a range of biological, physio-chemical, and hydromorphological quality elements. The overall ecological status classification for a water body is determined by the element with the worst status out of all the biological and supporting quality elements.

- **Chemical status** is an assessment of the chemical concentrations in the water body. Good Chemical status means that no concentrations of priority substances exceed the relevant environmental quality standards set out in the WER. The environmental quality standards aim to protect the most sensitive species from direct toxicity, including predators and humans via secondary poisoning.

Table 5.6 below provides a summary overview of the WER status for all river water bodies passing through East Devon, according to the Environment Agency's Catchment Data Explorer (DEFRA, 2025). Objectives to be achieved and detailed information for each water body has been reviewed and can be found in Appendix B.

Table 5.6: WER status and objectives of water bodies in East Devon District (Source: Environment Agency Catchment Data Explorer, 2025)

Water Body	Operational Catchment	Current Ecological Status (2022)	Current Chemical Status* (2022)	Overall Water Body Status Objective (by year 2027)
Aylesbeare Stream	Clyst and Culm	Poor	Fail	Good
Bolham River	Clyst and Culm	Poor	Fail	Good
Ford Stream (EXE)	Clyst and Culm	Poor	Fail	Good
Grindle Brook	Clyst and Culm	Poor	Fail	Good
Ken Stream	Clyst and Culm	Moderate	Fail	Good
Lower Clyst	Clyst and Culm	Moderate	Fail	Good
Lower Culm	Clyst and Culm	Moderate	Fail	Good
Madford River	Clyst and Culm	Moderate	Fail	Good
Middle Culm	Clyst and Culm	Moderate	Fail	Good
Polly Brook	Clyst and Culm	Poor	Fail	Good
Sheldon Stream	Clyst and Culm	Moderate	Fail	Good
Upper Clyst	Clyst and Culm	Moderate	Fail	Good
Upper Cranny Brook	Clyst and Culm	Moderate	Fail	Good
Weaver	Clyst and Culm	Bad	Fail	Good
Alphin Brook	Creedy and West Exe	Good	Fail	Good
Jackmoor Brook	Creedy and West Exe	Moderate	Fail	Good
Lower Creedy	Creedy and West Exe	Bad	Fail	Good
Exe (Creedy to Estuary)	Exe Main	Moderate	Fail	Good
Exe (Culm to Creedy)	Exe Main	Moderate	Fail	Good
Exe (Barle to Culm)	Exe Main	Moderate	Fail	Good
Blackwater river	Lim and Axe	Moderate	Fail	Good

Water Body	Operational Catchment	Current Ecological Status (2022)	Current Chemical Status* (2022)	Overall Water Body Status Objective (by year 2027)
Branscombe stream	Lim and Axe	Moderate	Fail	Good
Corry Brook	Lim and Axe	Moderate	Fail	Good
Forton Brook	Lim and Axe	Bad	Fail	Good
Kit Brook	Lim and Axe	Moderate	Fail	Good
Lim	Lim and Axe	Moderate	Fail	Good
Lower Axe	Lim and Axe	Moderate	Fail	Good
Lower Coly	Lim and Axe	Poor	Fail	Good
Offwell Brook	Lim and Axe	Moderate	Fail	Good
Umborne Brook	Lim and Axe	Moderate	Fail	Good
Upper Coly	Lim and Axe	Moderate	Fail	Good
Yarty	Lim and Axe	Moderate	Fail	Good
Love	Sid and Otter	Moderate	Fail	Good
Lower River Otter	Sid and Otter	Poor	Fail	Good
Middle River Otter	Sid and Otter	Poor	Fail	Good
Sid	Sid and Otter	Moderate	Fail	Good
Tale	Sid and Otter	Moderate	Fail	Good
Upper River Otter	Sid and Otter	Moderate	Fail	Good
Wolf (Otter)	Sid and Otter	Poor	Fail	Good

** For the 2019 assessment of chemical status for surface water bodies the Environment Agency have changed some methods and increased their evidence base. Due to these changes, all water bodies in the UK now fail chemical status, and this assessment is not comparable to previous years assessments. The four groups of global pollutants (PBTs) that cause the significant change in chemical classification are: polybrominated diphenyl ethers (PBDEs - a group of brominated flame retardants); Mercury; certain polycyclic aromatic hydrocarbons (PAHs) and perfluorooctane sulfonate (PFOS) a group of per-and polyfluoroalkyl substances (PFAS) which is being assessed for the first time* [29].

Common pressures on water body status in the area include:

- A high proportion of nitrogen and phosphorus, predominantly from diffuse agricultural pollution (e.g., maize farming). These macronutrients drive eutrophication—the accelerated growth of algae and aquatic plants—which increases biological oxygen demand and reduces dissolved oxygen concentrations. This process alters water quality and affects river habitat characteristics
- The presence of sediment in runoff can be detrimental to water bodies. Soil erosion, also potentially exacerbated by agricultural practices, can result in increased sedimentation in rivers and streams, affecting water quality and habitat for aquatic organisms.
- A high proportion of fine sediments, from urban and agricultural surface water runoff. Excessive fine sediment, in suspension or deposited on the channel bed, can have damaging physiological, behavioural and habitat impacts on all life stages of fish, invertebrates and plants, as well as transfer and storage of contaminants and decreasing oxygen levels.
- The 'East Devon abstraction licensing strategy' document discusses the management of new and existing abstraction and impoundments, which implies that water abstraction is a concern.

Excessive abstraction can lower water levels, potentially affecting aquatic habitats and the availability of water for ecosystems.

Table 5.7 shows the current and objective chemical status for each water body receiving from the WwTW listed in **Table 5.5**. Ammonia (NH_4) and dissolved oxygen levels are classified as high status, meaning NH_4 concentrations are low and dissolved oxygen is sufficiently high to ensure oxygen availability does not constrain aquatic communities. Moderate phosphate concentrations contributed to the current failure of an overall good ecological classification for all relevant receiving water bodies. Poor livestock management is partly responsible for the moderate phosphate concentrations in the Lower Axe, Blackwater River, Lower River Otter and the Middle River Otter. Continuous sewage discharge is one of the main contributors of a reduction in phosphate standards in the Lower Axe, Lower River Otter and the Middle River Otter. Trade and industry discharges is one of the main discharges that likely reduces the phosphate standards in the Lim and Axe catchment. Whereas poor soil and nutrient management contributed into Blackwater River will also be a main contributor in phosphates in that catchment. Groundwater abstraction was also responsible in the Lower River Otter.

Table 5.7: Current Chemical WER status for WwTW water bodies scoped in for River Quality Planning (RQP) modelling

Water Body	WwTW(s)	Operational Catchments	Ammonia		Phosphate			Dissolved Oxygen	
			Current status	Objective status	Current status	Objective status	Current reasons for not achieving good status	Current status	Objective status
Lower Axe	Colyton, Kilmington	Lim and Axe	High	Good (2015)	Moderate	Good (2027)	Diffuse source: Poor Livestock Management Point Source: Sewage discharge (continuous)	High	Good (2015)
Blackwater River	Hawkchurch		High	Good (2015)	Moderate	Good (2027)	Poor Livestock Management Poor Soil Management Poor Nutrient Management Point Source: Sewage discharge (continuous)	High	Good (2015)
Lower River Otter	Fluxton, Feniton	Sid and Otter	High	Good (2015)	Moderate	Good (2027)	Diffuse source: Poor Livestock Management Point Source: Sewage discharge (continuous) Flow: groundwater abstraction	High	Good (2015)
Middle River Otter	Honiton		High	Good (2015)	Moderate	Good (2027)	Diffuse source: Poor Livestock Management Point Source: Sewage discharge (continuous)	High	Good (2015)
Polly Brook	Woodbury	Clyst and Culm	-	Good (2015)	-	Good (2027)	Not recorded. Poor livestock management is recorded for Macrophytes and Phytobenthos Combined	-	Good (2015)

5.1.6 Discharge consents

The capacity of the receiving watercourse to dilute WwTW discharges is important for determining future impacts of development. WwTW discharge consents refer to physio-chemical elements, e.g., phosphorus, BOD, or NH4. Information on discharge consent quality requirements for the three identified key parameters to ensure 'no deterioration' occurs in the current WER status has been provided by the Environment Agency for the WRCs in East Devon and is presented in **Table 5.8** below. Not all WwTWs will have permitted consent limit for physio-chemical elements and may only have a singular limit for each chemical.

Table 5.8: Discharge consent quality requirements for East Devon District WRCs (Source: Environment Agency Water Quality Permits and Flow Capacity DWMP SWW, 2025)

WwTW	Phosphorus (mg/l)		Biological Oxygen Demand (BOD) (mg/l)		Ammonia (mg/l N)		Consented DWF Flow (m^3/d)
	Limit	Upper Tier Limit	Limit	Upper Tier Limit	Limit	Upper Tier Limit	
Colyton	N/A	N/A	27	62	N/A	N/A	783
Countess Wear	N/A	N/A	15	20	10	10	40,486
Dunkeswell	N/A	N/A	10	20	3	N/A	314
Feniton	N/A	N/A	18	N/A	9	N/A	400
Fluxton	0.6	N/A	30	80	10	46	1,620
Hawkchurch	N/A	N/A	30	N/A	15	N/A	65
Honiton	0.8	N/A	15	50	5	20	3,115
Kilmington	1	N/A	25	60	N/A	N/A	2,229
Seaton South	N/A	N/A	20	N/A	N/A	N/A	2,493
Sidmouth	N/A	N/A	N/A	N/A	N/A	N/A	6,331
Tatworth	N/A	N/A	20	56	5	20	937
Maer Lane	N/A	N/A	40	N/A	N/A	N/A	11,825
Musbury & Whitford	N/A	N/A	30	N/A	10	N/A	285
Otterton	N/A	N/A	40	80	N/A	N/A	1,643
Woodbury	N/A	N/A	10	50	5.5	21	408

5.1.7 Planned investment at Exmouth Maer Lane

Based on the results of a BRAVA analysis (**Table 5.4**), SWW characterised challenges that the Exmouth Maer Lane catchment may potentially experience and concluded that it requires further investment to increase its future resilience (South West Water, 2023).

Internal sewer flooding / collapse and DWF compliance failures were not identified as risks. Of more immediate concern was future sewer flood risk, both in one in 10-year and one in 50-year scenarios. Exmouth Maer Lane was characterised as being at an immediate high risk of future sewer flooding with 12.6% of its properties at risk of sewer flooding. Overflows in Maer Lane were recognized as an immediate

moderate risk, at sub-standard (medium) level or lower. Out of six external flooding hotspots, two can be attributed to hydraulic overload. 70% of its 20 overflows were also noted as being below a satisfactory level. It only has one identified pollution hotspot (near Sandy Bay SPS).

Based on its population size and system configurations, it was classed as a “Complex” TPU. Although its DWF results from 2018 – 2020 indicate that it has spare DWF capacity available, WwTW performance monitoring indicates that its overall storage capacity (11,825 m^3) may need to be increased within the catchment to fulfil medium to long-term strategies. This falls under the intervention Option ID “WWT3” – increasing treatment capacity and / or additional process streams (increasing plant capacity). The DWMP proposed a storage increase of 3,824 m^3 (accounting for 5.6% of the total proposed storage increase for the Exe catchment). Another proposed intervention includes the introduction of 9.6 ha of surface water separation measures which would include the construction/modification of separate surface water systems (Option ID SWM4). The final proposed intervention involved increasing the capacity of existing foul / combined networks through constructing new stormwater storage systems (Option ID CFS2).

5.1.8 Previous updates to Exmouth Maer Lane

Projections in the 2010 WCS concluded that there was no consented capacity for growth at Exmouth Maer Lane above its current DWF of 9,186 m^3/day, owing to growth projections1 for 2011, 2016, 2021 and 2026 all exceeding this by 1111 m^3/day, 1296 m^3/day, 1480 m^3/day and 1665 m^3/day respectively. These calculations included flows from Budleigh Salterton which were pumped to the site. The WCS also stated that the EA was in discussions to potentially increase the DWF consented level to accommodate the projected growth to 2026 (10,851 m^3/day).

Since then, two major changes have transformed the position from “no capacity” to “less than 10% spare capacity.” The first change was an increase in the DWF permit. The consented DWF has been raised to 11,825 m^3/day, providing an additional 2,639 m^3/day above the original 2010 limit. This increase alone represents a significant uplift in permitted capacity and is a key factor in reducing the risk of non-compliance.

The second change involved infrastructure upgrades carried out between 2023 and 2025. At Maer Road Pumping Station, the installation of permanent secondary power and electrical upgrades improved resilience and reliability. Over 300 metres of relined sewer pipeline entering the wastewater treatment works reduced hydraulic restrictions and improved conveyance. These works increased the effective throughput and reduced storm overflow events, creating additional operational headroom, although the exact uplift in m^3/day will be quantified in the final design reporting.

Together, these measures mean the site now operates with less than 10% spare capacity relative to its new consented DWF of 11,825 m^3/day, rather than having zero headroom as in 2010. Further resilience will come from the planned doubling of treatment capacity by March 2028 under SWW’s AMP7 WINEP scheme, which the Environment Agency has stated that SWW’s AMP7 WINEP scheme will not be registered as fulfilled until this expansion is complete [30].

5.1.9 Previous updates to Countess Wear

The 2010 WCS projections indicated that there was capacity within Countess Wear WwTW for new development of up to 21,500 houses by 2026 without breaching the 2010 consented DWF of 40,486 m^3/day. Forecasts indicated the calculated DWFs for 2011, 2016, 2021 and 2026 were below the threshold by 9094 m^3/day, 7108 m^3/day, 5121 m^3/day and 3135 m^3/day respectively.

Though the forecasted DWFs were not in breach of the 2010 consented DWF, the Environment Agency raised concerns regarding the nutrient loads in the Exe estuary, into which Countess Wear discharges [31].

The estuary is home to both a Ramsar site and a Special Protection Area (SPA) and was already marked as having elevated nutrient loads from WwTWs as well as diffuse agricultural pollution. Therefore, though capacity may have existed in the catchment for a further 21,500 houses, the accompanying increase in nutrient load was flagged as a potential constraint to this development. The Environment Agency ultimately concluded that development was permitted providing that monitoring and early warning systems were in place to detect the first signs of any nutrient stress to avoid ecosystem deterioration.

As part of SWW's recent DWMP, future capacity issues were identified at Countess Wear. A new treatment plant is required to deal with future development, which will be located east of the Exe. The exact location of the new plant is yet to be decided, and the project is forecast to be completed in the next decade. Partnership flood schemes have also been discussed alongside the upgrades to Countess Wear WwTW to aid network resilience [32].

5.1.10 Exmouth CSO performance between 2018 and 2024

5.1.10.1 Critical areas

Given Exmouth Maer Lane has seen significant upgrades highlighting significant hydraulic stress and operational challenges (see **Section 5.1.8**) and the proposed future growth around Exmouth, this WCS also covers the CSOs at Exmouth as a 'critical area'. At the same time, it is the focus of major planned investment by SWW, including capacity upgrades at Maer Lane WwTW and network improvements to enhance resilience. These interventions are critical due to the catchment's complex system configuration and high risk of sewer flooding, making it essential to understand current pressures and future constraints. This understanding is particularly important for development phasing, as infrastructure upgrades and permit changes may need to be completed before certain growth can proceed without increasing flood risk or breaching environmental compliance.

To provide this context, Event Duration Monitoring (EDM) data was analysed to assess CSO performance across the Exmouth catchment between 2018 and 2024 from the Rivers Trust detailed CSO performance [33] (**Table 5.9**). Certain inferences can be drawn from this data:

- An increased number of spills indicate mechanical breakdown. If the number of spill events rises significantly but the duration of each event remains relatively short, this often points to intermittent failures in mechanical components such as pumps, screens, or valves. These breakdowns can cause repeated triggering of overflow events even when the hydraulic capacity is not exceeded [34].

- An increased spill duration could indicate hydraulic overload/increased flow. When spill events last longer, it usually indicates that the system cannot cope with incoming flows, meaning the hydraulic capacity is exceeded. This is often linked to heavy rainfall, infiltration, or increased base flow from population growth [34].

CSO performance across the Exmouth catchment was worst in 2023 and 2024. Spills of the highest duration occurred in 2023, totalling 3827.52 hours over 12 months (exceeding the spill durations of 2018/19, 2021, 2022 and 2024 by 2990.52, 1254.91, 2423.46 and 413.26 hours respectively).

Whilst most CSOs saw a decrease in the number of spills in 2024 compared to the previous year, the overall number of spills was the worst that year (primarily owing to CSO performance at Lime Kiln). Previous years exhibited better CSO performance; fewer spills occurred, and spills were shorter in duration on average. However, performance in 2021 was noticeably worse than 2022 in both performance measures.

Spills were most common and of highest duration on average at seven primary CSOs across this time period, namely Hartopp Road CSO, Imperial Road Tank CSO, Lime Kiln Tank CSO, Maer Lane STW, both Maer Road CSOs and Phear Park CSO. Maer Road SPST PSCSO Exmouth was also noted as beginning its function on the cessation of activity at Maer Road SPS CSO. The largest average number of spills (**Figure 5.3**) occurred in Phear Park PSEO/CSO, Maer Road SPST PSCSO, and Lime Kiln Tank CSO, the latter location displaying the most frequent average number of spills. This aligned with data from **Table 5.9**. indicating a general trend of increasing spill numbers between 2018 and 2024 at these stations [33].

Given the higher average spill duration at Maer Lane STW (**Table 5.9**), there should be further clarification from SWW of the future headroom capacity for the proposed development should be undertaken prior to development. The future capacity issues identified at Countess Wear also indicate that development plans within this catchment should account for the potential commissioning of a new treatment plant in the coming years, east of the Exe. Although the exact location of the new plant is yet to be decided, development plans should ideally be adaptable to this scenario.

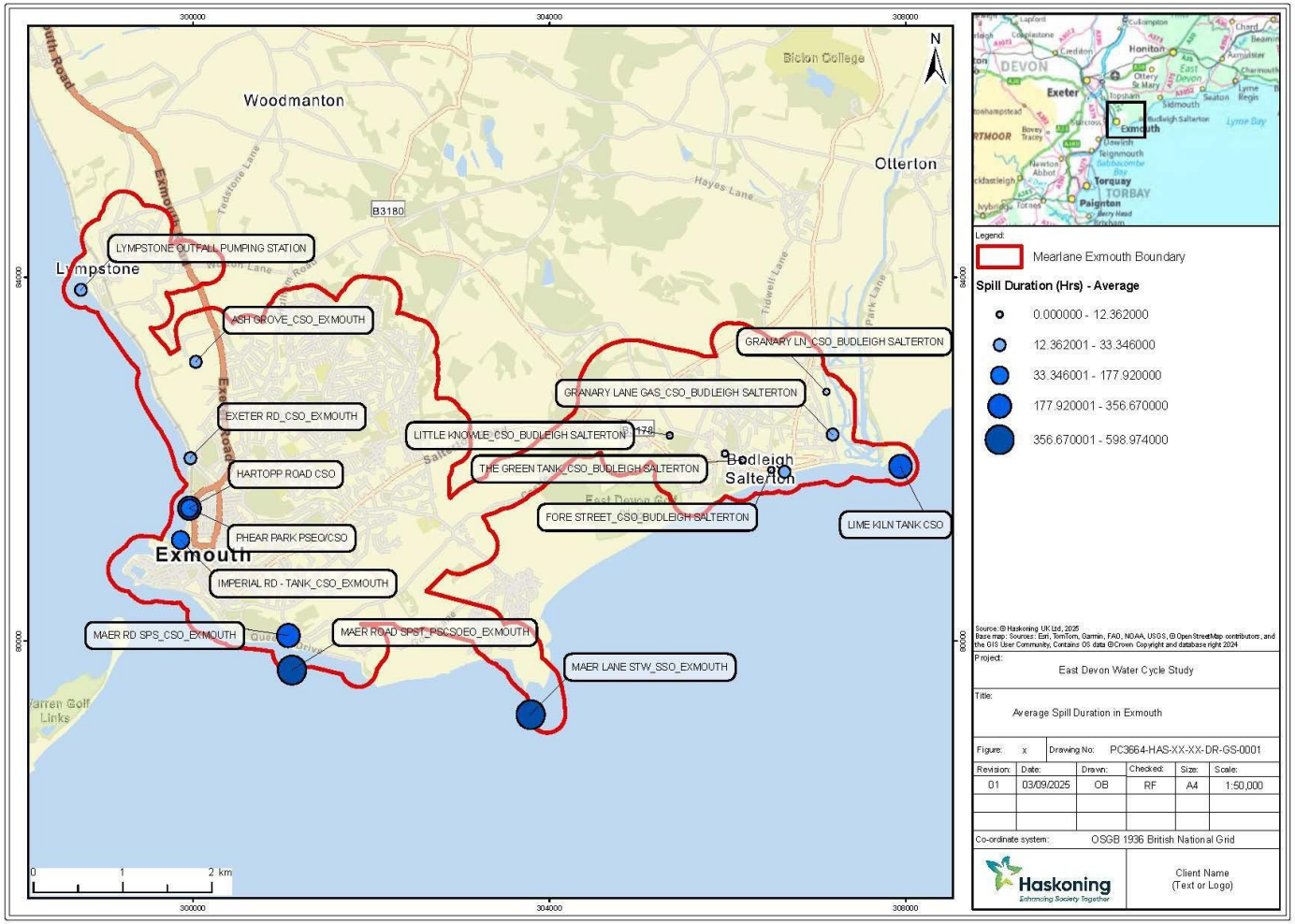


Figure 5.2: Map of average spill duration in Exmouth, the larger the circle the higher the average spill duration (hours) across the past 5 years of CSO monitoring data.

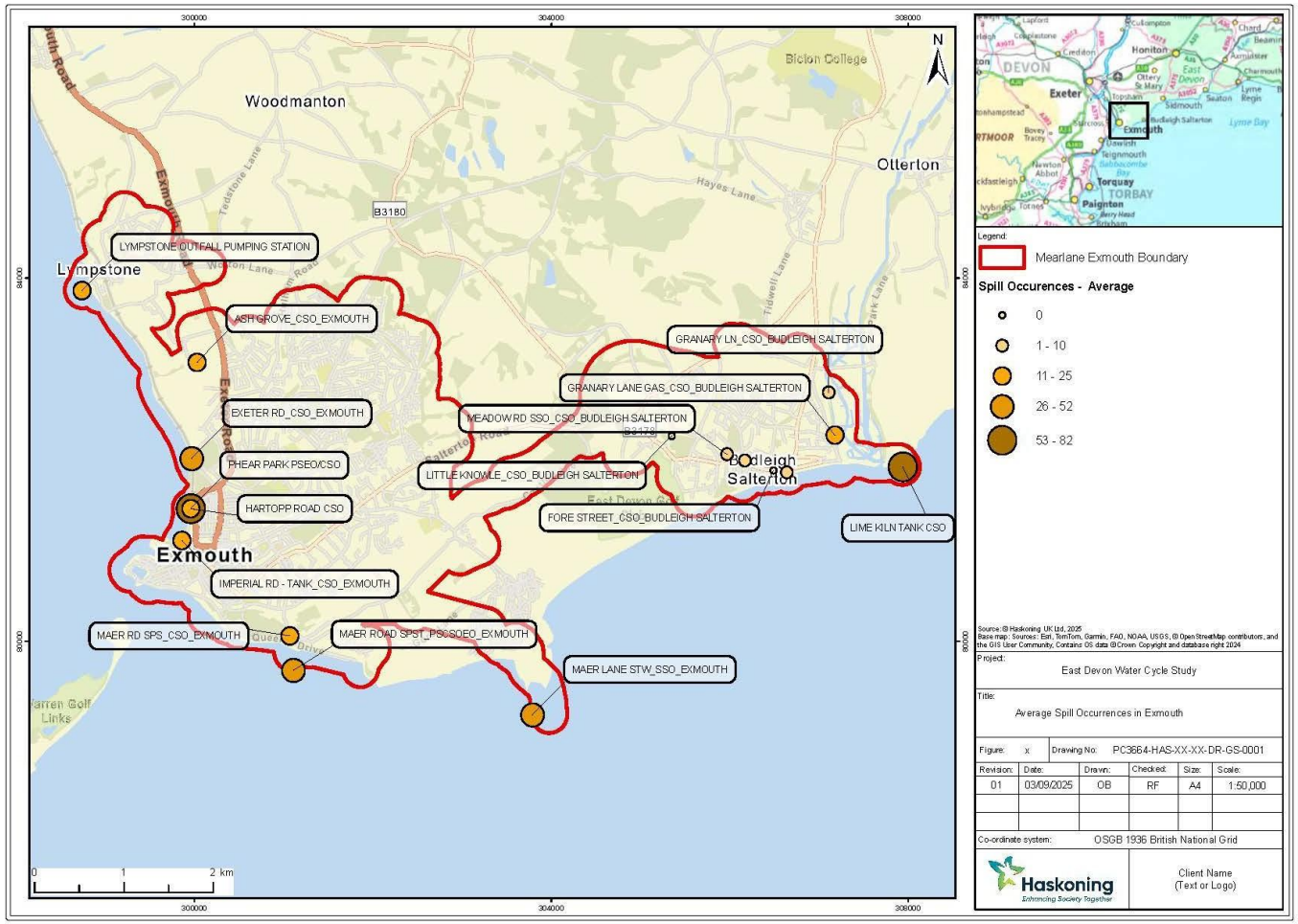


Figure 5.3: Map of average spill occurrences in Exmouth, the larger the circle the higher the number of spill events that occurred across the past 5 years of CSO monitoring data.

Table 5.9: Spil count and durations per Exmouth CSO between 2018 and 2024, ordered according to ascending average duration (Source: Storm Overflows EDM, England and Wales; The Rivers Trust, 2025)

Location of CSO	Year										Average		Future Data Trend
	2018/19*		2021		2022		2023		2024				
	Number of spills	Duration (hrs)	Number of spills	Duration (hrs)	Number of spills	Duration (hrs)	Number of spills	Duration (hrs)	Number of spills	Duration (hrs)	Number of spills	Durations (hrs)	
Fore Street CSO Budleigh Salterton	0	0	0	0	0	0	0	0	0	0	0	0	No data
Little Knowle CSO Budleigh Salterton	0	0	0	0	0	0	0	0	0	0	0	0	No data
Granary Lane CSO Budleigh Salterton	4	1	▲6	▲1.04	▼4	▼0.66	▲9	▲1.86	▼6	▼1.39	5.8	1.19	No obvious trend
Meadow Road SSO CSO Budleigh Salterton	16	9	▼14	▲15.39	▼0	▼0	▲8	▲6.95	▼7	▲8.75	9	8.02	Decreasing
The Green Tank CSO Budleigh Salterton	3	3	▲9	▲11.82	▼3	▼3.97	▲10	▲21.09	10	▲21.93	7	12.36	Increasing
Granary Lane Gas CSO Budleigh Salterton	18	12	▼16	▲20.24	▼11	▼6.5	▲32	▲25.93	▼20	▼9.75	19.4	14.88	Decreasing

Location of CSO	Year										Average		Future Data Trend
	2018/19*		2021		2022		2023		2024				
	Number of spills	Duration (hrs)	Number of spills	Duration (hrs)	Number of spills	Duration (hrs)	Number of spills	Duration (hrs)	Number of spills	Duration (hrs)	Number of spills	Durations (hrs)	
Lympstone Outfall PS	0	0	▲13	▲14.23	▲20	▼8.96	▲44	▲31.95	▼31	▼27.88	21.6	16.60	Increasing
Marine Parade CSO Budleigh Salterton	5	13	▲11	▲31.18	▼7	▼11.8	▲10	▲24.76	▼9	▼22	8.4	20.55	No obvious trend
Exeter Road CSO Exmouth	69	56	▼12	▼13.47	▲30	▲16.43	▲35	▲23.73	▼25	▲25.83	34.2	27.09	No obvious trend
Ash Grove CSO Exmouth	18	24	▲22	▲26.86	▼18	▼16.93	▲34	▲41.37	▼28	▲57.57	24	33.35	No obvious trend
Imperial Road Tank CSO Exmouth	11	64	▲15	▲102.4	▼12	▼86.35	▲22	▲151.30	▼19	▼123.94	15.8	105.60	No obvious trend
Phear Park PSEO/CSO	0	0	▲18	▲27.44	▼1	▼5.74	▲31	▲231.01	▲51	▲625.41	20.2	177.92	Increasing
Lime Kiln Tank CSO	0	0	▲48	▲432.95	▼31	▼269.69	▲118	▲465.79	▲212	▼212.06	81.8	276.10	Increasing
Hartopp Road CSO	0	0	▲50	▲118.9	▼43	▼88.23	▲87	▲718.06	▼82	▼659.53	52.4	316.94	No obvious trend
Maer Road SPS CSO Exmouth	49	655	▲74	▲1128.35	▼0	▼0	0	0	0	0	24.6	356.67	No obvious trend
Maer Road SPST PSCSO Exmouth	0	0	0	0	▲39	▲470.49	▲74	▲883.16	▲76	▼870.56	37.8	444.84	Increasing
Maer Lane	0	0	▲49	▲628.34	▼32	▼418.31	▲83	▲1200.56	▼65	▼747.66	45.8	598.97	No obvious

Location of CSO	Year										Average		Future Data Trend
	2018/19*		2021		2022		2023		2024				
	Number of spills	Duration (hrs)	Number of spills	Duration (hrs)	Number of spills	Duration (hrs)	Number of spills	Duration (hrs)	Number of spills	Duration (hrs)	Number of spills	Durations (hrs)	
STW SSO Exmouth													trend
TOTAL	**193**	**837**	**357**	**2572.61**	**251**	**1404.06**	**597**	**3827.52**	**641**	**3414.26**			

**Please note that data was limited for this year of CSO performance statistics (fewer CSO stations were recorded), decreasing the confidence level for averaged values from that period.*

5.2 Impact of development on wastewater and water quality

5.2.1 Sewerage network

New development leads to an increase in demand for sewerage services and hence increased treated discharge flows from WwTWs. Effluent is collected and directed to the closest WwTW. Increased discharges from WwTWs may have an adverse impact on flood risk that needs to be taken into consideration.

5.2.2 Wastewater treatment capacity

New development sites will reduce the wastewater network capacity. Therefore, where wastewater networks are at capacity, mitigation measures are required so that sewer flooding risk is not increased and sewage network infrastructure upgrades are likely to be required which may have phasing implications. Given these implications, an additional assessment of WwTW capacity in terms of the new development proposed in the emerging Local Plan has been made to inform this report, the findings of this assessment are provided in Table 5–10. To calculate the future capacity the projected DWF was calculated using the current Q80 flow at each WwTW. This projection reflects the anticipated increase in flow (m³/day) resulting from population growth linked to proposed developments and is used to assess how much additional capacity will be required at each site.

When WwTWs are operating at or above 90% of their permitted capacity they are scoped into further investigation that models the potential impact this could have on the environment and permitted pollutant levels. For example, those discharging into riverine systems will be scoped into River Quality Planning (RQP) modelling, which is specifically designed to simulate pollutant mixing and compliance in freshwater environments using a Monte Carlo simulation. Sites discharging into coastal waters, or where this is limited data, will undergo load standstill modelling as RQP is not suitable for coastal systems due to their complex tidal dynamics, stratification, and multidirectional flows. Load standstill modelling is a simplified approach that evaluates whether projected population growth at each site could lead to a deterioration in water quality. This is determined by comparing the expected increase in pollutant loads from the percentage increase in population against current permit limits.

Table 5.10: Capacity within permitted DWF headroom to accept future flows, deficit or WwTWs within 10% of the permitted capacity are highlighted in red (Sources, dWRMP SWW, 2024 and Flow capacity DWMP SWW, 2025)

WwTW	Total Proposed Dwellings (excluding commercial)	Current PE	Projected DWF (m^3/day)	Permitted DWF (m^3/day)	Existing Capacity (m^3/day)	Future Capacity (m^3/day)
Colyton	133	2,914	762	783	21	-62
Countess Wear	8,769	160,948	36,239	40,486	4247	-587
Dunkeswell	43	1,430	272	314	42	22.
Feniton	147	2,000	415	400	-15	-88
Fluxton (Ottery St Mary)	387	7,311	1,858	1,620	-238	-474
Hawkchurch	12	256	38.4	65	30	26.6

WwTW	Total Proposed Dwellings (excluding commercial)	Current PE	Projected DWF (m^3/day)	Permitted DWF (m^3/day)	Existing Capacity (m^3/day)	Future Capacity (m^3/day)
Honiton	848	12,870	4,539	3,115	-1424	-2264
Kilmington	1,109	8,910	1,691	2,228.6	535	22
Seaton South	284	9,627	2,452	2,493	41	-133
Woodbury	269	1,676	427	408	-19	-151
Maer Lane	1,586	44,109	10,805	11,825	1020	81
Musbury & Whitford	22	634	142	285	143	135
Otterton	87	3,766	1,524	1,643	119	70
Sidmouth	215	14,380	5,143	6,331	1188	1016
Tatworth	30	2,342	632	937	305	286

Several studies, including this WCS, will inform the Council in the decision of the location and scale of housing and employment allocations in the Local Plan. The joint approach with all relevant stakeholders needs to ensure an adequate available wastewater treatment capacity over the assessed period. Further detailed analysis and consultation with SWW is recommended to improve the assessment of the cumulative impact of development on both water treatment capacity and water quality and to identify potential mitigation measures.

5.2.3 Water body status

The receiving water body for each WRC is presented in **Table 5.11**. Each water body has its own corresponding ecological, chemical and mitigation assessment status (Appendix B) which is critical to factor in before any developments or plans are made that may add to the water stress. Full details on these water bodies are presented in Appendix B.

Table 5.11: Associated WER water body for each WRC (Source: Environment Agency Catchment data and ONS)

WwTW	Water body
Colyton	Lower Axe (GB108045008870)
Countess Wear	Exe (GB510804505600)
Dunkeswell	Lower River Otter (GB108045009170)
Feniton	Lower River Otter (GB108045009170)
Fluxton	Lower River Otter (GB108045009170)
Hawkchurch	Blackwater River (GB108045008850)
Honiton	Middle River Otter (GB108045009180)
Kilmington	Lower Axe (GB108045008870)

WwTW	Water body
Seaton South	Axe (GB510804505400)
Woodbury	Polly Brook (GB108045008980)
Maer Lane (Exmouth)	Exe (GB510804505600)
Musbury & Whitford	Lower Axe (GB108045008870)
Otterton	Lower River Otter (GB108045009170)
Sidmouth	Sid (GB108045009160)
Tatworth	Forton Brook (GB108045014820)

5.3 River Quality Planning (RQP)

The RQP modelling methodology is a systematic process used to assess the water quality impact of discharge from WwTWs on receiving watercourses, ensuring compliance with the WER and the Habitats Regulations (2017).

The modelling considers the current and future DWF, Biochemical Oxygen Demand (BOD), and concentrations of pollutants such as NH_4 and phosphorus (P), as well as the projected increase in pollutant load due to proposed developments. RQP modelling is essential for long-term planning, predicting the environmental consequences of proposed developments, and guiding the implementation of Technically Achievable Limit (TAL) to minimise ecological disruption.

5.3.1 Method

5.3.1.1 Overview of approach

The RQP tool produced by the Environment Agency provides the best practice approach for this assessment. The tool uses a Monte Carlo Mass Balance approach to calculate the permit limit values needed for each pollutant to achieve a specified river quality standard.

The following data is required to run the RQP software:

- Upstream river flow data (Source: National River Flow Archive):
  - Mean average flow.
  - 95% exceedance flow (i.e. low flow).
- Upstream river concentration data (Source: Environment Agency WIMS):
  - Mean average concentration for each pollutant.
  - Standard deviation.
  - Number of samples.
- WwTW flow data (Source: SWW):
  - Mean average discharge flow.
  - Standard deviation.
- WwTW concentrations data (Source: Environment Agency WIMS):
  - Mean discharge quality.
  - Standard deviation.
  - Number of samples.

Within the RQP modelling for the relevant WwTW there were certain chemicals that did not have recorded amounts for P, BOD or NH_4. For these circumstances, 60% of the consented amount was used as the measurement and a third of that total was used as the standard deviation as per the recommendation by

Scottish Environment Protection Agency (SEPA) guidance [35] (note that this is the most detailed guidance on the use of RQP modelling and is not specific to Scotland). The model's predictions were validated by comparing them with the water body classification system set out in the Water Framework Directive (Standards and Classification) Directions (England and Wales) 2015 and the objectives for each water body set out in the South West RBMP [1]. Compliance or non-compliance with the WER targets is ascertained through this comparison.

The following downstream target scenarios were modelled:

- Maintain current mixing point quality: Maintain current mixing point quality for the pollutant, after growth. This is a precautionary approach which ensures no deterioration from the current conditions.
- Limit deterioration to 10%: Limiting deterioration at the mixing point to 10% for the pollutant, after growth. This is required to minimise deterioration within WER status class.
- Limiting status deterioration: Ensuring no deterioration from the current WER status for the pollutant. This is to ensure the WER policy requirement that 'development must not cause a deterioration in WER status' is met.
- Meet future target status: WER target status for the pollutant (where the physio-chemical status is not currently being achieved). This ensures the WER policy requirement 'development must not prevent a water body from achieving its Future Target Status' is met.

The following criteria were used to scope in treatment works for the RQP modelling:

- The WwTW will exceed the permitted flow headroom capacity after growth.
- The WwTW would be operating with less than 10% of the permitted DWF limit after growth.
- The WwTW discharges into the River Axe SAC (regardless of residual headroom capacity after growth).

Treatment works with greater than 10% headroom after growth and those that discharge into a transitional (estuarine) water body were scoped out of RQP modelling and selected for Load Standstill calculations. Treatment works which would not receive any growth were scoped out of all modelling.

5.3.1.2 Technically Achievable Limit

For the purposes of this modelling, the TAL for each of the pollutants is summarised in **Table 5.12** TAL is the lowest possible effluent concentration that can be achieved for each pollutant, using conventional existing treatment technology.

Table 5.12: TAL of each pollutant (Source SEPA, 2016).

Pollutant	Statistic	Concentration (mg/l)
BOD	95%ile	5
NH4	95%ile	1
P	Mean	0.25

5.3.2 RQP modelling assumptions

RQP modelling was undertaken for all treatment works which will have less than 10% headroom post growth, as well as all the treatment works which discharge effluent into the River Axe SAC. Load standstill calculations have been undertaken on the remaining wastewater treatment works that will have a greater than 10% headroom capacity post growth and are located outside of the River Axe SAC. Load standstill calculations have also been undertaken on treatment works which discharge to a tidal water body. Due to insufficient data

at Woodbury, RQP modelling was not possible and load standstill calculations were conducted. **Table 5.13** outlines which WwTWs were selected for RQP modelling.

Table 5.13: WwTWs selected for RQP modelling.

WwTW	Capacity headroom post growth	Scoped in for RQP?
Colyton	Exceeding	Yes
Countess Wear	Exceeding	No – tidal discharge therefore Load Standstill modelling
Dunkeswell	<10%	Yes
Feniton	Exceeding	Yes
Fluxton	Exceeding	Yes
Hawkchurch	>20%	No growth expected
Honiton	Exceeding	Yes
Kilmington	>20%	Yes – because it also discharges into Axe SAC
Seaton South	Exceeding	No – tidal discharge therefore Load Standstill modelling
Woodbury	Exceeding	No – insufficient data for RQP
Maer Lane	<10%	Yes
Musbury & Whitford	>40%	No
Otterton	<10%	Yes
Sidmouth	<20%	No
Tatworth	>20%	No

Where Mean Discharge Quality was not known, an assumption was made that the mean was 60% of the WER class boundary. Where the standard deviation of this mean was not known it was assumed to be 1/3 of the mean. Where the number of samples was unknown, the number of samples was set to 12 as per the guidance on surface water pollution risk assessments, corroborated by SEPA guidance (SEPA, 2016).

5.3.3 Model outputs

The results below show the required discharge quality of phosphorus (P), NH_4, and biochemical oxygen demand (BOD) at the 95th percentile, and therefore provide the lower tier permit which water companies would be expected to work towards. A Red Amber Green (RAG) assessment is presented in Table 5–14 with the results of the RQP modelling. The RAG assessment refers to the following categories:

Green: No changes to existing permit limits are required – growth can be accepted with no significant changes to the permits.
Amber: Changes to the discharge permit are required to meet WER / Habitats Regulations objectives. Upgrades may have phasing implication for growth.
Red: Changes to the discharge permit are beyond what can be achieved with conventional treatment (i.e., below the TAL). The WER / Habitats Regulations objectives cannot be met.

Table 5.14: RQP modelling results

Sites	Scenarios	P	NH_4	BOD
Colyton	No deterioration	No data available	No data available	Failed
	Limit deterioration to 10%	No data available	No data available	Failed
	Ensure no class deterioration	No data available	No data available	Failed
	Not limit future to achieve good	No data available	No data available	Failed
Dunkeswell	No deterioration	0.02	Failed	No data available
	Limit deterioration to 10%	0.062	Failed	No data available
	Ensure no class deterioration	2.5	5.23	No data available
	Not limit future to achieve good	0.68	5.23	No data available
Feniton	No deterioration	No data available	Failed	No data available
	Limit deterioration to 10%	No data available	Failed	No data available
	Ensure no class deterioration	No data available	43.8	No data available
	Not limit future to achieve good	No data available	43.8	No data available
Fluxton	No deterioration	0.21	Failed	No data available
	Limit deterioration to 10%	1.88	Failed	No data available
	Ensure no class deterioration	62.9	9.88	No data available
	Not limit future to achieve good	Failed	9.88	No data available
Honiton	No deterioration	No data available	Failed	No data available
	Limit deterioration to 10%	No data available	0.041	No data available
	Ensure no class deterioration	No data available	1.13	No data available
	Not limit future to achieve good	No data available	1.78	No data available
Kilmington	No deterioration	0.083	Failed	No data available
	Limit deterioration to 10%	1.18	Failed	No data available
	Ensure no class deterioration	13.1	20.6	No data available
	Not limit future to achieve good	Failed	20.6	No data available
Otterton	No deterioration	No data available	No data available	Failed
	Limit deterioration to 10%	No data available	No data available	Failed
	Ensure no class deterioration	No data available	No data available	35.6

Sites	Scenarios	P	NH_4	BOD
	Not limit future to achieve good	No data available	No data available	108

All WwTWs discharges will result in deterioration at the mixing point from the current upstream in river quality of P, NH_4 and BOD (where tested). Ensuring no deterioration at the mixing point often requires infrastructure upgrades, which could have implications on phasing, or is not possible through conventional treatment; this applies to Colyton, Honiton and Kilmington. Further engagement with SWW and the Environment Agency will likely be required regarding potential solutions at the treatment works and within the river catchment.

The results of the RQP modelling for the P permits shows that the WER requirements to 'Ensure no deterioration from the current WER class status' can, in all cases, be met within the existing permit limits. The permit limits to achieve the WER policy requirement 'development must not prevent a water body from achieving its Future Target Status' can be met in all cases, except for Fluxton and Kilmington. In this case, the effluent concentration required to meet the river concentration target status is not possible to achieve. Limiting within WER class deterioration to 10% can, in all cases, be met within the existing permit limits, or through upgrades within conventional methods of treatment.

The existing permit limits for NH_4 are sufficient to prevent WER class deterioration from 'Good'. Achieving no more than a 10% increase in NH_4 concentrations at any WwTW through conventional treatment upgrades is highly unlikely. This is because none of the existing WwTW configurations can meet the required river-quality targets, regardless of achievable effluent concentrations.

The BOD assessment was significantly compromised due to a widespread lack of sample data, particularly upstream of WwTW. Modelling was undertaken at Otterton where limited data was available. Current 2025 data [36] suggests that the BOD levels currently sit in 'high' WER status downstream of Otterton WwTW. The modelling determined that to ensure no deterioration at the mixing point and prevent class deterioration to 'good', the existing permit limit is sufficient.

5.4 Load standstill calculations

Load standstill calculations have been used to determine the future permits required for P, NH_4 and BOD at the respective treatment works. These calculations are appropriate for WwTWs that discharge into an estuarine water body and were within 10% of capacity of their respective WwTWs, these were specifically Seaton South, Countess Wear, Maer Lane and Woodbury.

The findings of the load standstill calculations are presented in **Table 5.15.** The RAG assessment criteria for the effluent quality refers to the following categories:

Green: No changes to existing permit limits are required – growth can be accepted with no significant changes to the permits.
Amber: Changes to the discharge permit is required, but within conventional treatment processes.
Red: Changes to the discharge permit are beyond what can be achieved with conventional treatment (i.e., below the TAL).

Table 5.15: Results of load standstill calculations

Parameter	Seaton South	Countess Wear	Maer Lane	Woodbury
Current DWF permit (m3/day)	2,493	40,486	11,825	408
Q80 flow (m3/day)	2,452	36,239	10,805	427
Headroom (m3/day)	41	4,247	1,020	-19
P permit limit (mg/l) (annual average)	-	-	-	-
NH4 permit limit (mg/l) (95%ile)	-	10	-	5.5
BOD permit limit (mg/l) (95%ile)	20	15	40	10
Future flow post growth (m3/day)	2,421	40,122	11,697	550
P effluent quality permit required (mg/l) (annual average)	-	-	-	-
NH4 effluent quality permit required (mg/l) (95%ile)	-	8.82	-	4.27
BOD effluent quality permit required (mg/l) (95%ile)	18.69	13.23	36.95	7.76

The results show that in all cases there may be a need for improvements to the quality standards. However, these improvements are all possible within conventional treatment. Minor alterations to the permits will be required to ensure there is no deterioration in the current quality for all the watercourses. As a result, growth at these treatment works can be achieved without an impact on downstream water dependant designated sites.

5.5 Summary

New development in East Devon will increase demand on the sewerage network & WwTWs, resulting in higher treated discharge flows. This growth may exacerbate flood risk and reduce network capacity, requiring mitigation measures and infrastructure upgrades.

Where WwTWs operate at or above 90% of their permitted capacity, further investigation is needed to assess environmental impacts and compliance with pollutant limits. Using RQP modelling for riverine discharges and load standstill calculations for tidal systems, capacity analysis shows that seven WwTWs, including Colyton, Countess Wear, Honiton, Fluxton, Feniton, Seaton South and Woodbury will exceed permitted flow headroom post-growth, while others such as Dunkeswell, Maer Lane and Otterton will have less than 10% remaining capacity. This could lead to phasing implications for development.

RQP modelling indicates that all WwTWs will cause some deterioration in mixing point quality for P, NH_4, and BOD, with upgrades often required to prevent ecological harm. In some cases, such as Colyton, achieving compliance for BOD may not be possible with conventional treatment, necessitating further engagement with SWW and the Environment Agency.

Load standstill modelling for tidal discharges (e.g., Countess Wear, Seaton South, Maer Lane, and Woodbury) suggests that minor permit adjustments can accommodate growth without significant environmental impact. However, improvements to effluent quality standards will still be required to maintain current water quality and prevent deterioration.

6 Implications for the Water Environment

6.1 Introduction

Residential development can potentially result in adverse impacts on the aquatic environment through a variety of mechanisms, including:

- Increased abstraction of water from surface water and groundwater, which could result in reduced river flows groundwater levels and adverse impacts on aquatic and water-dependent habitats and species.
- Increased discharge of nutrients and other potential contaminants into surface water and connected groundwater, for example because of increased discharges of treated effluent from WwTWs, septic tanks and contaminated surface runoff.

The remainder of this section considers the potential environmental implications of the development allocations described in **Section 0** on the water environment within EDDC.

6.2 Environmental designated sites

A summary of all designated sites that lie within the study area is provided in Table 6.1: Designated Sites in East Devon (Source: DEFRA MAGIC map, 2024)**Table 6.1.** There are a total of four Special Areas of Conservation (SACs), two Special Protection Areas (SPAs), one Ramsar and 23 Sites of Special Scientific Interest (SSSI) within the EDDC study area. Of those sites only three SACs, two SPAs, one Ramsar and eight SSSIs are hydrologically relevant to watercourses in the EDDC study area. The full list of hydrologically relevant SSSIs is available in Appendix C.

Table 6.1: Designated Sites in East Devon (Source: DEFRA MAGIC map, 2024)

Designated Site		Total Area within EDDC (ha)
SACs	East Devon Pebblebed Heaths	1123.82
	Sidmouth to West Bay	626.82
	River Axe	25.1
Ramsar	Exe Estuary	710
SPAs	Exe Estuary	710
	East Devon Pebblebed Heaths	1123.82
SSSIs	Total of all areas	2002.06

6.3 Impact of development on biodiversity and conservation

Development within East Devon District can have both positive and negative impacts on biodiversity and conservation, depending on how development is managed. Some of the potential issues related to water resources availability have been discussed in **Section 4.2.2.1.**

6.3.1 Potential adverse impacts on designated sites

6.3.1.1 Mechanisms for impact

A key element influencing new development is the presence of conservation sites in the study area; any changes or works, including associated infrastructure, proposed as part of the WCS must ensure that there are no detrimental impacts on such sites.

A source of information regarding the impacts of development in East Devon on biodiversity and conservation is the HRA of internationally important sites (SAC, SPA, Ramsar, collectively referred to as

Natura 2000 sites). An HRA Screening Report was prepared in 2015. Table 6–2 includes the comments provided in the HRA on the vulnerabilities identified.

It should be noted that the HRA does not provide detailed information about water supply to the River Exe or the River Lim and Axe, such as where, how often and how much these are maintained from different sources, such as STWs or agricultural sources.

The emerging Local Plan is in its early stages of development and further information is anticipated in relation to effects to biodiversity and environmental conservation. The Council is likely to prepare a new HRA for the emerging Local Plan that will identify potential adverse effects from the proposed development. It is recommended that any future HRA specifically considers the vulnerability of the Exe Estuary and River Axe in terms of the input of water from sources with high nutrient levels.

Table 6.2: Vulnerabilities identified the in the previous HRA screening document of the hydrologically relevant Natura 2000 sites in East Devon (Source: East Devon HRA Screening 2019, East Devon Area of Outstanding Natural Beauty Partnership and Natural England Poll)

Site Name	Natura 2000 Status	Qualifying Features	Relevant Vulnerability Comments
East Devon Pebbled Heaths	SSSI, SAC	North Atlantic wet heaths with *Erica tetralix* European dry heaths Southern damselfly *Coenagrion mercuria*	Heathland requires poor nutrient soils. Southern damselfly prefers pools and runners to be relatively clear of vegetation and so will be vulnerable to nutrient enrichment of flushes. Suitable larval habitat consists of belts of emergent, floating, and submerged vegetation along the fringes of water bodies. Water abstraction from local groundwater sources could have adverse consequences for the site's hydrology resulting in changes to the vegetation characteristics of the site. Southern damselfly may be vulnerable to climate change impacts such as drier summers. Burning, cutting and grazing regimes are required to maintain the open vegetation structure and character of dry heath. Natural processes would lead to succession to thick scrub (such as *Gorse Ulex* spp) or secondary forest. Some fluctuations and variations from year to year are normal and acceptable. Southern damselfly adults require open structured habitat for foraging therefore changes in grazing of wet heaths may have a detrimental impact. Changes in adjacent agricultural management (e.g. stock feeding, poaching, and emissions of NH_4 to air from pig farming) may have an adverse impact on the water chemistry and water levels and may result in changes to the vegetation characteristics of the site. Quarrying occurring in the immediate vicinity may have an adverse impact on the water chemistry and on water levels and may result in changes to the vegetation characteristics of the site.

Site Name	Natura 2000 Status	Qualifying Features	Relevant Vulnerability Comments
East Devon Heaths	SPA	Nightjar *Caprimulgus europaeus* Dartford warbler *Sylvia undata*	Much of the site is under positive conservation management. Changes in water supply may result in major changes to the vegetation and/or affect the ability of the site to provide food supplies on which the birds depend. Local quarrying may have an adverse impact on water chemistry or result in major changes to the vegetation and/or affect the
Exe Estuary	SPA, Ramsar	Dark bellied brent goose *Branta bernicla bernicla* Dunlin *Calidris alpina* Oystercatcher *Haematopusm ostralegus* Black tailed godwit *Limosa limosa* Grey plover *Pluvalis squatarola* Slavonian grebe *Podiceps auratus* Avocet *Recurvirostra avosetta*	Maintenance dredging occurs in the estuary approach channel that could have adverse impacts on sediment movement patterns and Dawlish Warren Sandspit.
Sidmouth to West Bay	SAC	Vegetated season cliffs of the Atlantic and Baltic Coasts Tilo-Acerion forests of slopes, screes, and ravines (priority feature) Annual vegetation of drift lines	An important aspect of this habitat is the modification of vegetation patterns in response to natural geomorphological coastal processes without constraints. Introduction of or increase in physical constraints would reduce the mobility of the cliff and reduce the range of communities representing the vegetated sea cliffs. Excessive browsing/grazing by even native ungulates may be considered an unnatural external factor where it leads to undesirable shifts in the composition/structure of the stand. The habitats within this site are highly sensitive to inorganic fertilisers and pesticides, applications of which should be avoided both within the site itself and in adjacent surrounding areas. Habitats are also susceptible to invasive introduced species, including rhododendron and cotoneaster, and, in wet situations, parrot's feather, Australian swamp stonecrop and Himalayan balsam. Such species should be controlled and, where practical, eliminated from the site. Herbicides may be useful in targeting certain invasive species but should be used with extreme care.
River Axe	SAC, SSSI	Water courses of plain to montane levels with the *Rannunculion fluitantis and Callinicho-Batrachion* vegetation Sea lamprey *Petroyzon marinus* Book lamprey *Lampetra*	The River Axe catchment is a cause for concern for nutrient neutrality. According to the River Axe SSSI 2025 Condition Assessment [37], the River Axe SSSI has high levels of reactive phosphorus (70–170% above targets) and other nutrients from agriculture, wastewater treatment works, and septic tanks. This has led to eutrophication, poor macrophyte communities, and failure of diatom targets (moderate WFD status). Within the SAC there is also noted intensive grazing

Site Name	Natura 2000 Status	Qualifying Features	Relevant Vulnerability Comments
		planeri Bullhead *Cottus gobio*	and unrestricted cattle grazing that has caused bank erosion that is increasing the destabilization of the cobb-gravel bed which is critical for the SAC vegetation. Despite regulatory efforts and investment, the river is not on a recovery trajectory.

The principles used in the HRA to identify pressures on National Site Network sites and Natural England designated sites viewer have been used to extend the identification of water-related pressures to SSSIs in the District. The results of this process are shown in **Table 6.3**.

Table 6.3: Water-related pressures on SSSIs (Source; Natural England Site Viewer)

SSSI Name	Water-related Pressure or Threat
East Devon Pebblebed Heath	Water abstraction from local groundwater sources could have adverse consequences for the site's hydrology resulting in changes to the vegetation characteristics of the site. Changes in adjacent agricultural management (e.g. stock feeding, poaching) may have an adverse impact on the water chemistry and water levels and may result in changes to the vegetation characteristics of the site. Quarrying occurring in the immediate vicinity may have an adverse impact on the water chemistry and on water levels and may result in changes to the vegetation characteristics of the site.
Otter Estuary	No immediate water-related threat identified
Ladram Bay and Sidmouth	No immediate water-related threat identified
Sidmouth to Beer Coast	High Flood and coastal erosion risk to the site which may impact population of schedule 5 crustacean, *Chirocephalus diaphanus*, a freshwater fairy shrimp. Decreasing water quality, a risk to population of the fairy shrimp
Axmouth to Lyme Regis Under Cliffs	No immediate water-related threat identified
River Axe	Freshwater protected fish species, river lamprey, bullhead and sea lamprey populations threatened by increasing water pollution and agricultural run-off
Hense Moor	Flooding and water quality are a threat to water fringe plant species
Brampford Speke	No immediate water-related threat identified

6.3.1.2 Protected habitats

The discharge of nutrients and other potential contaminants into surface water and connected groundwater, could potentially result in adverse impacts on water quality and on water-dependent habitats if the amount of discharge increases because of the proposed development**. Table 6–4** and **Table 6–5** presents an assessment of the likely effects of additional wastewater flows on water-dependent designated sites within East Devon. Areas of potential surface runoff were estimated using mapped areas of high flood risk zones from river pathways [38]. The predicted impact from the proposed developments using the RQP modelling is shown in a traffic light system:

Red indicates that there is a likely significant impact on the receptor and will result in the pathway or receptor failing the water quality permits and directly putting qualifying features or species and the wider ecosystem at risk of harm.

Amber reflects a likely impact that may result in the pathway or receptor failing the water quality permits and put qualifying features or species at risk.

Green indicates that the WwTW water quality is within limits of their permits and thus the predicted additional discharges, or additional surface run off are unlikely to impact receptors or pathways.

Grey is used for when there is not enough information from the RQP modelling to predict an impact or where the receptor is unlikely to be affected due to the hydrology or elevation of the designated site.

BOD was not used as an indicator for predicted impact as a lack of BOD data prevented modelling for BOD to be carried out for Honiton.

Table 6.4 indicates that predicted increases in wastewater discharges into WwTW pathways from the proposed developments will likely negatively impact most receptors, in terms of P and NH_4 input. However, the Otter Estuary SSSI may be impacted from the modelled future discharge of NH_4 from developments at the Honiton WwTW, where there is currently a predicted deterioration in class from future growth, but P is not expected to be impacted. **Table 6–5** also finds that if the water bodies connected to the proposed developments flood into surrounding areas, it is also likely that there would be widespread negative impact on local designated terrestrial and aquatic based sites. It also shows that Kilmington WwTW increases in discharges are unlikely to significantly affect aquatic or terrestrial designated sites as the RQP modelling does not predict a WER class change from discharges of P and NH_4.

Table 6.4: Potential impacts of increased wastewater discharges on water-dependent designated sites (Source DEFRA MAGIC map, 2024 [39])

Source (WwTW)	Pathway	Receptor	Distance downstream (km)	Predicted Impact	Predicted Impact Category
Colyton	River Axe	Sidmouth to West Bay SAC Axmouth to Lyme Regis under Cliffs SSSI	5.6	Likely Impact. Agricultural runoff and Housing developments could threaten species within the river Axe. RQP modelling found Colyton to be failing the P deterioration rate and failed both for NH_4 and BOD. Therefore, further run off from Colyton has the potential to threaten the river Axe.	

Source (WwTW)	Pathway	Receptor	Distance downstream (km)	Predicted Impact	Predicted Impact Category
Countess Wear	River Exe	Exe Estuary Ramsar Exe Estuary SPA Exe Estuary SSSI	0 (Directly adjacent)	Likely Impact. The outputs from the RQP modelling suggests that an increase from housing developments will result in an increased level of P. Although it is unclear whether they will increase over advised limits. However, given the proximity to the WwTW, any increase in P will directly impact species and increase eutrophication risks within the Exe Estuary. Although, the water quality is currently a 'good' WER status area of the SSSI are in decline and there is a drop off in biodiversity in the area (Exe Estuary Management Partnership, 2022).	
Feniton	Vine Water (Flows to River Otter)	Otter Estuary SSSI	16.2	Likely no impact. Otter Estuary SSSI is a significant distance from the input source and is unlikely that nutrient or increased WwTW flow will impact the SSSI from this source.	
Fluxton	Fluxton Stream (Flows to River Otter)	Budleigh Salterton Cliffs	18.7	Likely no impact. Otter Estuary SSSI and Budleigh Salterton cliffs is a significant distance from the input source and is unlikely that nutrient or increased WwTW flow will impact the SSSI from this source. The cliffs are also unlikely to be impacted by increased flow from WwTW	
Fluxton	Fluxton Stream (Flows to River Otter)	Otter Estuary SSSI	9.2	Likely impact. Increased predicted discharge of P and NH_4 is not predicted to result in water quality failure within the pathway to the receptor. Unlikely that Fluxton WwTW discharge alone will impact SSSI, but there may be in combination impacts with Honiton WwTW which will need to be monitored if a combination of discharges will increase the predicted impact on the SSSI.	
Honiton	River Otter	Budleigh Salterton Cliffs	11.2	Likely no impact. Otter Estuary SSSI and Budleigh Salterton cliffs is a significant distance from the input source and is unlikely that nutrient or increased WwTW flow will impact the SSSI from this source. The cliffs are also unlikely to be impacted by increased flow from WwTW.	

Source (WwTW)	Pathway	Receptor	Distance downstream (km)	Predicted Impact	Predicted Impact Category
Hawkchurch	Fair Water (Flows to Blackwater River)	River Axe SSSI River Axe SAC	2.5	Likely no impact. Hawkchurch was not modelled because of its high availability post-growth.	
Honiton	River Otter	Otter Estuary SSSI	20.5	Likely impact. Increased predicted discharge of P is predicted to result in water quality failure within the pathway to the receptor. Although the WwTW is a considerable distance away from the SSSI and nutrient discharge is likely to dilute over distance, there may be in combination impacts with Fluxton WwTW which will need to be monitored if a combination of discharges will increase the predicted impact on the SSSI's qualifying features.	

Table 6.5: Potential impacts of increased runoff on water-dependent designated sites (Source; DEFRA Magic Map, 2024)

Settlement Areas	Main water bodies and WwTW	Receptor	Closest surface run off distance (km)	Predicted Impact	Predicted Impact Category
Axminister	River Axe, Kilmington WwTW	River Axe SAC	1	Likely to impact. Although the discharge amounts from Kilmington would be within given permits for P, NH_4 and BOD there is additional risk in rising agricultural run-off from developments, that is already significantly impacting the nutrient neutrality of the River Axe SSSI and SAC (Strategic planning committee EDDC, 2025). Furthermore, the Colyton WwTW also discharges into a joining tributary that could likely create an in-combination impact on the qualifying features.	
		River Axe SSSI	1		
		Sidmouth to West Bay SSSI	9.1	Likely low impact. Surface run-off effects were investigated by Natural England but currently it is not identified as a threat to the SSSI or SAC from East Devon's HRA (Liley and Underhill-Day, 2015)	
		Sidmouth to West Bay SAC	9.1		
Ottery St Mary	River Otter, Fluxton WwTW	East Devon Pebblebed Heaths	2.1	Likely no impact. Receptor is upstream and at a higher elevation from development site.	
		East Devon Heaths SPA	2.1	Likely no impact. Receptor is upstream and at a higher elevation from development site.	

Settlement Areas	Main water bodies and WwTW	Receptor	Closest surface run off distance (km)	Predicted Impact	Predicted Impact Category
		East Devon Pebblebed Heaths SSSI	2.1	Likely no impact. Receptor is upstream and at a higher elevation from development site.	
		Otter Estuary SSSI	10.7	Likely to impact. Although, the development site is a considerable distance from the SSSI, there may be likely in combination impacts from other development sites (e.g. GH/ED/39a) that can increase run off into the SSSI and nutrient neutrality problems may arise.	
Honiton (HEELA sites GH/ED/39a, 39b)	River Otter, Honiton	Budleigh Salterton Cliffs (SSSI)	12.8	Likely no impact due to elevation and distance from pathway	
		Otter Estuary SSSI	21.7	Likely to impact. Although, the development site is a considerable distance from the SSSI, there may be likely in combination impacts from other development sites (e.g. GH/ED/27) that can increase run off into the SSSI and nutrient neutrality problems may arise.	
		Budleigh Salterton Cliffs (SSSI)	23.7	Likely no impact due to elevation and distance from pathway	
Lympstone (HEELA sites GH/ED/72a, 73, Lymp_01 and Lymp_07)	River Exe, Countess Wear	Exe Estuary SPA	0.6	Likely significant impact. Due to the proximity and already predicted high impact effects from discharge increases from Countess Wear WwTW, additional surface run-off into the Exe is likely to cause an in-combination impact on the qualifying species and wider habitat.	
		Exe Estuary Ramsar	0.6		
		Exe Estuary SSSI	0.6		
Axminister (HEELA sites GH/ED/80a, 83)	River Axe, Kilmington	River Axe SAC River Axe SSSI	1.3 1.3	Likely to impact. Increased run-off from this development site, in-combination from the predicted impact of WwTW discharges directly into the river is likely to further impact the species from an increase in nutrients.	
		Sidmouth to West Bay SAC	11.3	Likely no impact due to elevation and distance from pathway	
		Axmouth to Lyme Regis Under Cliff SSSI	11.3	Likely no impact due to elevation and distance from pathway	
Colyton	River Coly, Colyton	River Axe SAC	1.3	Increased run-off from this development site, in-combination from the predicted impact of WwTW discharges directly into the river and other developments	

Settlement Areas	Main water bodies and WwTW	Receptor	Closest surface run off distance (km)	Predicted Impact	Predicted Impact Category
				(GH/ED/80a,83) is likely to further impact the species from an increase in nutrients.	
		Bolyshane Fen	2.2	Likely low impact. Bolyshane Fen qualifying species are not expected to be impacted by run-off water.	
Lympstone	Wolton Brook	East Devon Pebbled Heath SAC	3.1	Likely no impact due to elevation upstream from pathway	
Exmouth	Tidal Exe, Exmouth	East Devon Pebbled Heath SAC	2	Likely no impact due to elevation upstream from pathway	
Woodbury	Gillbrook	East Devon Pebbled Heaths SAC	1.8	Likely no impact due to elevation upstream from pathway	
Otterton	River Otter, Fluxton	East Devon Pebbled Heath SAC	2.7	Likely no impact due to elevation upstream from pathway	
Seaton	River Axe	River Otter SAC	1.3	Likely to impact. Run-off amount from this development site in-combination with GH/ED/27 & 39a could be investigated for an in-combination impact on the receptor.	
		Spring Head SSSI	1.9	Likely no impact due to elevation of the Spring head SSSI and the location of the SSSI on the other side of a valley, unlikely that run-off from developments will reach this site.	

6.3.1.3 Protected species

In addition to considering the impacts on habitats, the impacts on protected species must also be taken into consideration. The protected species as classified under the Wildlife and Countryside Act 1981 and red listed species that have been previously recorded in the East Devon area within the past 10 years (2014 – 2024) are listed in **Appendix C**. In East Devon, the protected species in England and red list species comprises of 41 species of birds (29 red listed but not under statutory protection in England), five mammalian species, 10 species of herptiles, one invertebrate species, one fish species and four plant species.

The potential presence of these species in East Devon should be viewed as a constraint until it can be demonstrated that there will be no adverse impacts. To do this, EIAs should be prepared for new developments, if covered by the EIA Regulations 2(1) and Schedules 1 and 2, to assess:

- Impacts of any additional water services infrastructure.
- Impacts of surface water runoff and systems to manage runoff.
- Impacts of any increased foul flows to the environment from combined sewer overflows (CSO) or WwTW/WRCs.

East Devon is also home to important populations of some species not on the UK Priority list, but which are still special and in need of conservation. These species may be nationally rare, scarce, or notable species as well as listed within the NERC Section 41 (actions needed and/or within the Threatened or Near threatened IUCN category). As these are not UK Priority Species, they are not covered by the requirements in national and local planning policies and there is no specific obligation to consider them. However, they have been identified as valuable in a local context and have been recommended as target species to be considered for conservation where appropriate. A list of these additional species of interest has been produced and is presented in **Appendix C**. This list has no legal obligations associated with it and is based on knowledge and suggestions from local experts.

6.4 Opportunities for biodiversity enhancement

Development in East Devon should also seek to provide opportunities for biodiversity enhancement and will be legally required to do so following the assent of the Environment Act (**Section 5.1.1.1**). Within the Consultation draft plan Autumn 2022 there are policies and actions that are opportunities to enhancing biodiversity which are laid out in **Table 6.6.** A specific Biodiversity Action Plan (BAP) will be required in the future.

Table 6.6: Potential enhancements to biodiversity (Source: Draft EDDC Local Plan, 2023)

Policy	Opportunity for enhancement
Urban and developed environments	Include functional features of biodiversity value in designs of developments, like integrated bird boxes, and align proposals with ecological best practices.
Land around the coast and estuaries	Prohibit development or changes of use that would damage the open status of the area or affect views to and from the sea.

Nutrient management solutions have the potential for further co-benefits for biodiversity enhancement by targeting a range of habitats. **Table 6.7** outlines the methods to which nutrient management solutions can enhance biodiversity.

Table 6.7: Nutrient management solutions using Nature Based or runoff management solutions.

Nutrient management solution	Summary of Solution	Biodiversity enhancement opportunity
Nature Based Solutions		
Constructed wetlands	Artificial wetlands utilise natural processes to efficiently removal nutrients and suspended solids from water sources.	Wetlands provide valuable habitat for a range of mammals, reptiles, amphibians, fish, birds and invertebrate species, providing biodiversity enhancements across the ecosystem. Constructed wetlands can incorporate other management strategies, such as reedbed installations, to further enhance biodiversity.
Riparian buffer strips	Permanent vegetation margin that provides a diffuse barrier between nutrient source (for example, arable fields) and water courses.	Buffer strips restore riverbank heterogeneity with adjacent watercourses, providing opportunities for habitat creation for both aquatic and terrestrial biodiversity. For example, adult stages of many freshwater macro-invertebrates rely on sufficient terrestrial habitats to develop. Buffer strips can also enhance opportunity for pollination species.
Wet woodlands	Enhance sediment deposition and nutrient uptake by plants.	Wet woodlands provide opportunities to enhance habitat for native tree species and for unique aquatic macro- invertebrates which in turn, supports important predator species (e.g., bat species).
Beetle banks	Densely vegetated elevated soil mounds to control surface runoff of nutrients.	Beetle banks provide suitable overwintering habitat for predatory insects and spiders as well as habitat creation and migratory pathways for small mammals and farmland birds.

Nutrient management solution	Summary of Solution	Biodiversity enhancement opportunity
Beaver reintroduction	Controlled reintroduction of beavers into landscape creating unique wetland habitats.	Beavers create diverse wetland environments that can provide habitat for a wide range of organisms, for example aquatic macro-invertebrates and fish.
Runoff management systems		
SuDS	Installation or retrofitting SuDS can slow and promote infiltration of rainfall via mimicking natural processes.	SuDS can provide a range of terrestrial and wetland habitat opportunities for biodiversity enhancement via creation of artificial ponds, swales, or vegetated banks.

6.5 Summary

Enhancing and conserving biodiversity is a statutory requirement in East Devon. The Regulation 19 draft plan Feb 2025 [40] embeds the principles of the Environment Act 2021, mandating biodiversity net gain (BNG) of at least 20% for major developments and aligning with Natural England's Green Infrastructure Framework. Policies emphasise the mitigation hierarchy and require robust Green and Blue Infrastructure Plans that connect habitats, restore ecological networks, and improve landscape-scale connectivity through the Local Nature Recovery Strategy and Nature Recovery Network.

Development proposals must integrate biodiversity-friendly design features such as swift boxes, bat roosts, green roofs, wildlife ponds, and native planting, alongside measures for priority species recovery. Environmental Impact Assessments (EIA) remain essential for assessing impacts on water infrastructure, surface water runoff, and foul flows from WwTWs or WRCs. The draft regulation 19 Local Plan stipulates that all development should contribute to nature recovery and enhance biodiversity, particularly in urban and coastal areas, through multifunctional green spaces and ecological corridors.

7 Summary of WCS Outcomes

7.1 Conclusions

This section summarises the main conclusions from the Outline WCS. The assessments supporting the conclusions are provided in **Sections 0** to **6** of this report.

7.1.1 Development in East Devon District

East Devon has experienced high population growth over the past decade and is projected to face a further increase in housing growth until 2040. The development in East Devon needs careful planning to mitigate potential risks associated with increased flooding and to ensure sufficient capacity in water supply and sewerage systems. The NPPF stresses that Local Plans should be supported by SFRAs and other relevant studies to inform strategic land-use planning. These studies ensure that development within East Devon does not adversely impact the water environment, highlighting the necessity for an integrated approach between planning policies and water-related needs and challenges.

Overall, the developments in East Devon District stands at a juncture, where anticipated growth in housing and economic development necessitates a forward-looking and sustainable approach to water resource management, wastewater infrastructure, and environmental preservation.

7.1.2 Water resources

From this section we can conclude that the WRMU that are most likely to be under notable stress from future developments are:

- Otterton.
- Fairmile.
- Fenny Bridges.

In terms of surface water, when the flow is restricted to 70% or 95% loss in volume Otterton WRMU and Fairmile WRMU fall below the required standards to support good ecological status. In terms of Groundwater, Otterton, Fairmile and Fenny Bridges WRMU all fall below the required standards and will not receive further licences for water abstraction. This is of significance to the wider area because of the critical importance of the River Otter, being the most productive water body for water abstraction in East Devon and also the most under stress river in terms of biodiversity and ecological status.

According to the current baseline, water supply within the wider resource zone of Wimbleball is expected to go into a deficit by the end of 2024. Supply is currently predicted to continue in deficit until the 2050 target, which will likely put further stress on WRMUs to meet demand. However, based on the proposed final plan set forth by SWW, the water supply within the wider resource zone of Wimbleball is no longer expected to go into deficit for the end of this 2025 or for the next AMP cycles.

Provisions fast tracked into AMP7 (2020 – 2025) through DEFRA's accelerated delivery plan aims to build resilience into the water network and decrease water usage. Investment opportunities outlined in AMP8 and fast tracked into AMP7 include:

- Upgrading a third of water treatment asset.
- Improve connectivity between key reservoirs.
- Reduce leakage by 10%.
- Smart metering.

To ensure SWW's long term plan to stay out of water deficit in the future and overcome their baseline supply issues, the company plans to do the following:

- Leakage Reduction by 50% by 2045 in both best value and least cost plans.
- Water Efficiency and Demand Management Activities to meet EIP targets.
- Implement a 10-year rollout of smart metering.
- Use of Drought Permits and Restrictions to reduce reliance on drought options and water restrictions.
- Developing all options needed for an adaptive pathway, allowing adaptation at key monitoring points if necessary.

Collaboration among EDDC, the Environment Agency, SWW, and other stakeholders plays a vital role in addressing water resource management challenges, by developing comprehensive strategies that align with environmental legislation and support sustainable development. Ensuring that groundwater restoration programmes such as LORP are still funded, is also vital to ensure that any changes in the water quality or amount extracted from the aquifer does not seriously impact the already under stress habitats.

7.1.3 Wastewater collection, treatment, and water quality

Most major rivers in East Devon currently fail to meet physio-chemical standards for P, NH_4 and BOD, with only isolated watercourses achieving Good Ecological Status. Planned development will increase pressure on WwTWs and receiving water bodies, potentially worsening water quality if mitigation is not implemented.

Capacity assessments show that several WwTWs will operate at or beyond their permitted DWF limits post-growth. Sites with the most significant constraints include Colyton, Honiton, Fluxton, Feniton, Otterton, Maer Lane and Dunkeswell, all of which will exceed or fall within 10% of their consented capacity. Countess Wear, serving Exeter and surrounding areas, is also forecast to approach its limit, and a new treatment facility east of the Exe is planned to address future demand. These constraints have direct implications for development phasing, as upgrades or permit variations may be required before additional growth can proceed.

To assess compliance with WER and Habitats Regulations, RQP modelling was undertaken for WwTWs with <10% headroom post-growth or those discharging into sensitive catchments such as the River Axe SAC.

Scenarios tested included maintaining current mixing point quality, limiting deterioration to 10%, and achieving future target status. Results indicate:

- P: Avoiding WER class deterioration is achievable within existing permit limits at most sites, but achieving future target status of 'Good' is not possible at Fluxton and Kilmington as the current conditions of the locations where those connecting water bodies (Fluxton stream connecting to the lower River Otter and the River Axe) is currently below 'Good'.
- NH_4: Existing permits generally support compliance with WER class status but achieving no more than a 10% increase in NH_4 concentrations at any WwTW through conventional treatment upgrades is highly unlikely. This is because none of the existing WwTW configurations can meet the required river-quality targets, regardless of achievable effluent concentrations.
- BOD: RQP modelling was limited by data gaps; however, Colyton failed to prevent a class deterioration and will be in need of a new agreement for future permits, albeit planned investments by SWW may result in an update of Colyton's capacity that may reduce likely environmental impact. Load standstill calculations for tidal discharge sites (Countess Wear, Seaton South, Maer Lane and Woodbury) show that minor permit adjustments within conventional treatment processes can prevent deterioration.

Overall, compliance and water quality protection will require a combination of permit reviews, targeted infrastructure upgrades, and close coordination with SWW and EA. These measures will influence development phasing, as growth cannot proceed where treatment capacity or discharge quality improvements are outstanding. Early engagement and clear timelines for interventions (such as the planned Maer Lane

expansion and Countess Wear upgrades where prior CSO spills were frequent) are essential to align housing delivery with environmental obligations.

7.1.4 Implications for the water environment

This section delineates the impact of development on biodiversity, conservation, and water quality, underlining both the potential adverse effects and opportunities for improvement. From the proposed developments, combined with the RQP modelling the following designated sites and their qualifying features are likely to be put at a high risk from nutrient loading:

- River Exe Estuary SAC, SSSI, SPA – Countess Wear WwTW.
- River Axe SAC, SSSI – Colyton and Kilmington WwTWs.
- Otter Estuary SSSI – Honiton WwTW.

These designated sites are likely to be significantly impacted because of the increased nutrient output from WwTW directly into the site, such as Countess Wear, or through an accumulation of multiple rivers and surface run off sources pooling into the designated site. The River Axe SSSI and SAC already has denoted P problems, which would be made worse under the current development scenario.

The conclusion of this section also emphasizes the need to:

- Manage developments in a way that avoids negative impacts on critical conservation sites, including designated Natura 2000 sites;
- Highlighting vulnerabilities identified in HRA screenings;
- Monitor and further test potential increases in nutrient discharge and contaminants from WwTW and surface runoff; and
- Integrate biodiversity-friendly features into urban and coastal development zones to preserve ecological integrity.

7.2 Policy recommendations

Based on the analysis presented in Sections 4 to 6 of this WCS, the following high level policy recommendations should be considered by EDDC in the development of the Local Plan:

- Water resources and supply:
  - New development and re-development of land should wherever possible seek opportunities to implement water efficiency, water storage and water recycling measures. EDDC should monitor the application of such measures.
  - EDDC should adopt the lower limit of the Building Regulations [41] more stringent water efficiency requirement of 110 l/p/d for the Flood and Water policies to be set out in the emerging Local Plan.
- Water quality:
  - Potential developments that may adversely affect green infrastructure assets and water quality should not be permitted. Developments should demonstrate opportunities to create and enhance the water environment.

Given the proposed growth at WwTWs and potential impact that may have on the capacity of each WwTW and the physio-chemical environmental permits there are predicted phasing implications for the proposed developments.

As shown in **Table 7.1,** of the proposed developments those served by smaller WwTWs such as Hawkchurch (12 dwellings), Dunkeswell (43 dwellings), Otterton (87 dwellings), Tatworth & Forton (30 dwellings), Whitford & Musbury (22 dwellings), and Sidmouth (215 dwellings) are unlikely to face immediate issues, as current capacity and permit compliance appear sufficient for proposed developments. In addition, WwTWs that are facing larger growth such as Kilmington (1,109 dwellings) and Maer Lane (1,586 dwellings) also currently have sufficient capacity and environmental permit limits.

However, significant capacity upgrades will be essential at major WwTWs to support future development, Honiton (848 dwellings), Feniton (147 dwellings), Woodbury (269 dwellings), Seaton South (284 dwellings) and Fluxton (387 dwellings) also present critical risks, with predicted capacity exceedance necessitating phased investment or advanced treatment solutions that should be raised with SWW. Future options and planned improvements must be carefully considered to determine phasing timelines of these developments within these WwTW networks. This will ensure that development can progress in parallel with the necessary infrastructure enhancements, avoiding delays and maintaining compliance with environmental requirements. There are also predicted marginal capacity exceedances at Countess Wear WwTW, which is predicted to serve and additional proposed 8,796 dwellings. Although, significant investment has previously been made to upgrade capacity and further investment is planned, which may not be reflected within this study if capacity is expected to increase post-2025 (**Section 5.1.9**).

Phasing discussions for developments at the Colyton WwTW must take place before any developments are made as both treatment capacity and BOD permit compliance are predicted to be breached. Without intervention to upgrade biological processes and secure permit amendments, the 133 dwellings allocated to this WwTW cannot proceed. Addressing these constraints through strategic infrastructure planning and early regulatory engagement with the Environment Agency may be needed.

Table 7.1 Development phasing implications and viability assessment. Green indicates where no action needs to be taken to ensure permit compliance for the development at the WwTW level. Whereas, Red indicates where an action must be taken to ensure that the development can go ahead because the WwTWs are predicted to exceed capacity or fail to prevent physicochemical deterioration to a lower WER classification predicted from RQP modelling and growth.

WwTW	HELAA Reference	Total Dwellings	Capacity Viability	Environmental Permit Viability
Colyton	Clyst_NP, Coly_02, Coly_06a	133	Exceeding	Predicted to fail current BOD permit
Countess Wear	New Community, Brcl_12 & Brcl_29, Brcl_12 & Brcl_29, Brcl_23, Brcl_26, Brcl_27a, Clge_07, Clge_25a, Farr_01, GH/ED/43, GH/ED/45, North of Topsham, Whim_08, Whim_08, Whim_11	8,769	Exceeding	
Dunkeswell	Dunk_05	43		
Feniton	Feni_05, Feni_08, Otry_20, Payh_03a, Plym_03	147	Exceeding	
Fluxton	GH/ED/27, Otry_01b, Otry_04, Otry_09, Otry_10, Otry_15, Otry_21, West_04, West_18	387	Exceeding	
Hawkchurch	Hawk_01	12		
Honiton	Brhe_09, GH/ED/39a, GH/ED/39b, Gitti_03, Gitti_05, Honi_06, Honi_07, Honi_10, Honi_12, Honi_13, Honi_14, Honi_18	848	Exceeding	
Kilmington	Axmi_01a, Axmi_02, Axmi_07, Axmi_08, Axmi_09, Axmi_10, Axmi_11c, Axmi_12, Axmi_17, Axmi_18, Axmi_22, Axmi_23, Axmi_24, GH/ED/80, GH/ED/83, Kilm_09b, Kilm_10	1,109		
Maer Lane	Budl_02, Exmo_04a, Exmo_06, Exmo_08, Exmo_16, Exmo_17, Exmo_18, Exmo_20, Exmo_23, Exmo_47, Exmo_50, GH/ED/72a, GH/ED/73, Lymp_01, Lymp_07, Lymp_07, Lymp_14	1,586		

WwTW	HELAA Reference	Total Dwellings	Capacity Viability	Environmental Permit Viability
Otterton	Ebud_01, Newt_04, Newt_05, Otto_01	87		
Seaton South	Seat_02, Seat_03, Seat_05, Seat_13a	284	Exceeding	
Sidmouth	Sidm_01, Sidm_06a, Sidm_31, Sidm_34, Sidm_34, Sidm_34	215		
Tatworth	Char_04a	30		
Whitford & Musbury	Musb_01a	22		
Woodbury	Wood_01, Wood_06, Wood_09, Wood_10, Wood_16, Wood_20, Wood_28	269	Exceeding	

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Data sources

APPENDIX A

A1- Data sources used in the WCS Tables and Figures and where they were sourced from

Type of Information	Data Source
DEFRA MAGIC map	MAGIC, 2024 (defra.gov.uk)
Habitat Regulations Assessment Screening	https://www.eastdevon-nl.org.uk/wp-content/uploads/2020/02/HABITAT-REGULATION_Final_Jan19.pdf
Consultation draft plan Autumn 2022 East Devon District Council Local Plan	Draft Local Plan Consultation - East Devon
dWRMP South West Water	Drainage and wastewater management plan | South West Water
East Devon abstraction licensing strategy policy paper, Environment Agency	East Devon abstraction licensing strategy - GOV.UK (www.gov.uk)
Environment Agency Catchment Data Explorer	England | Catchment Data Explorer
JNCC UK BAP Priority species	UK BAP Priority Species | JNCC - Adviser to Government on Nature Conservation
NBN Atlas East Devon District Species Occurrence records	East Devon District | NBN Atlas
Natural England Site Viewer	https://designatedsites.naturalengland.org.uk/SiteSearch.aspx
Office for National Statistics Census 2021	Census - Office for National Statistics (ons.gov.uk)

Water Environment Regulations status and objectives of water bodies in East Devon District

APPENDIX B

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Table B1: Water Body Classification Objectives

Water Body	Current Ecological Status (2022)	Current Chemical Status (2022)	Ecological Status Objective (by year)	Chemical Status Objective (by year)
Clyst and Culm Operational Catchment				
Aylesbeare Stream	Poor	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Bolham River	Poor	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Ford Stream (EXE)	Poor	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Grindle Brook	Poor	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Ken Stream	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Lower Clyst	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Lower Culm	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Madford River	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Middle Culm	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Polly Brook	Poor	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Sheldon Stream	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Upper Clyst	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Upper Cranny Brook	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Weaver	Bad	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Creedy and West Axe Operational Catchment				
Alphin Brook	Good	Does not require assessment (Fail in 2019)	Good (2015)	Good (2063)
Jackmoor Brook	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Lower Creedy	Bad	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Exe Main Operational Catchment				
Exe (Creedy to Estuary)	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Exe (Culm to Creedy)	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Exe (Barle to Culm)	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)

Water Body	Current Ecological Status (2022)	Current Chemical Status (2022)	Ecological Status Objective (by year)	Chemical Status Objective (by year)
Lim and Axe Operational Catchment				
Blackwater river	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Branscombe stream	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Corry Brook	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Forton Brook	Bad	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Kit Brook	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Lim	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Lower Axe	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Lower Coly	Poor	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Offwell Brook	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Umborne Brook	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Upper Coly	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Yarty	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Sid and Otter Operational Catchment				
Love	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Lower River Otter	Poor	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Middle River Otter	Poor	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Sid	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Tale	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Upper River Otter	Moderate	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)
Wolf (Otter)	Poor	Does not require assessment (Fail in 2019)	Good (2027)	Good (2063)

Table B2: Aylesbeare stream water body data

Water Body Details	**Water body name**		Aylesbeare Stream	
	Water body ID		GB108045008730	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Clyst and Culm	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Nitrates Directive: Mid Devon and Aylesbeare Stream NVZ Special Area of Conservation: East Devon Pebblebed Heaths SAC	
	Ecological Status (2022)		Poor Ecological Status	
	Chemical Status (2022)		Does not require assessment (Fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Poor	Good (2027)
		Invertebrates	Poor	Good (2015)
		Macrophytes and Phytobenthos combined	Poor	Good (2027)
	Hydromorphological	Hydrological Regime	Supports good	Supports Good (2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Ammonia	High	Good (2015)
		Dissolved Oxygen	Good	Good (2015)
		Phosphate	Poor	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not Require Assessment	
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor Livestock Management (for elements: macrophytes and phytobenthos combined, Phosphate and fish).		
		Poor Soil Management (for elements: Fish).		
		Sewage Discharge (continuous) (for elements: Phosphates and macrophytes and phytobenthos combined).		

Table B3: Bolham River water body data

Water Body Details	**Water body name**		Bolham River	
	Water body ID		GB108045014930	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Clyst and Culm	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		No data	
	Ecological Status (2022)		Poor	
	Chemical Status (2022)		Does not require assessment (Fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Poor	Good (2027)
		Invertebrates	High	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	High	Supports good (2015)
		Morphology	Supports Good	-
	Physico-chemical Specific pollutants	Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require Assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor nutrient management (for Phosphate and macrophytes and phytobenthos combined)		
		Poor Soil Management (for Phosphate, fish and macrophytes and phytobenthos combined)		
		Farm/site infrastructure (for macrophytes and phytobenthos combined and Phosphate)		
		Barriers – ecological discontinuity (for Fish)		

Table B4: Ford Stream (EXE) water body data

Water Body Details	**Water body name**		Ford Stream (EXE)	
	Water body ID		GB108045008780	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Clyst and Culm	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Nitrates Directive – Mid Devon Special Protection Area – East Devon Pebblebed Heaths	
	Ecological Status (2022)		Poor	
	Chemical Status (2022)		Does not require assessment (Fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification (2022)**	**Objective (year)**
	Biological	Fish	Good	Good (2027)
		Invertebrates	High	Good (2015)
		Macrophytes and Phytobenthos combined	Poor	Good (2027)
	Hydromorphological	Hydrological Regime	Supports Good	Supports Good (2015)
		Morphology	Supports Good	-
	Physico-chemical Specific pollutants	Ammonia	High	Good (2015)
		Dissolved Oxygen	Good	Good (2015)
		Phosphate	Moderate	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good (2019)	Good (2015)
		Dioxins and dioxin-like compounds	Good (2019)	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good (2019)	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good (2019)	Good (2015)
		Hexachlorobenzene	Good (2019)	Good (2015)
		Hexachlorobutadiene	Good (2019)	Good (2015)
		Mercury and Its Compounds	Fail (2019)	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good (2019)	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail (2019)	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good (2019)	Good (2015)
		Fluoranthene	Good (2019)	Good (2015)
	Other Pollutants	-	-	-
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor Livestock Management (Macrophytes and Phytobenthos Combined and phosphate)		
		Urbanisation – urban development (for Phosphate)		
		Sewage Discharge (continuous) (for Phosphate		

Table B5: Grindle Brook water body data

Water Body Details	**Water body name**		Grindle Brook	
	Water body ID		GB108045008710	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Clyst and Culm	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Nitrates Directive – Mid Devon Special Protection Area – East Devon Pebblebed Heaths	
	Ecological Status (2022)		Poor	
	Chemical Status (2022)		Does not require assessment (Fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification (2022)**	**Objective (year)**
	Biological	Fish	Poor	Good (2027)
		Invertebrates	High	Good (2015)
		Macrophytes and Phytobenthos combined	Poor	Good (2027)
	Hydromorphological	Hydrological Regime	Supports good	Supports Good (2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Poor	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	-
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor Soil Management (for Fish)		
		Poor livestock management (for Macrophytes and Phytobenthos Combined and Phosphate)		
		Barriers – ecological discontinuity (for fish)		

Table B6: Ken stream water body data

Water Body Details	**Water body name**		Ken Stream	
	Water body ID		GB108045014880	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Clyst and Culm	
	Hydromorphological designation		River	
	Sensitive habitats / Protected Areas		Nitrates Directive – Mid Devon	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification (2022)**	**Objective (year)**
	Biological	Fish	Poor	Good (2027)
		Invertebrates	Good	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	Supports Good	Supports Good (2015)
		Morphology	Supports Good	-
	Physico-chemical Specific pollutants	Ammonia	Good	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	-
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor Soil management (for Fish and macrophytes and phytobenthos combined)		
		Poor livestock management (for fish, phosphate and macrophytes and phytobenthos combined)		
		Poor nutrient management (Phosphate)		
		Trade/Industry Discharge (for macrophytes and phytobenthos combined)		

Table B7: Lower Clyst Water body data

Water Body Details	**Water body name**		Lower Clyst	
	Water body ID		GB108045008750	
	Water body type		River	
	Management catchment		Devon east	
	Operational catchment		Clyst and Culm	
	Hydromorphological designation		Heavily modfied	
	Sensitive habitats / Protected Areas		Nitrates Directive: Mid Devon, Aylesbeare Stream NVZ Special protection Area: Exe Estuary SPA Ramsar Site: Exe Estuary	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification (2022)**	**Objective (year)**
	Biological	Fish	Moderate	Moderate (2021)
		Invertebrates	High	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	Supports good	Supports good (2015)
	Physico-chemical Specific pollutants	Ammonia	High	Good (2015)
		Dissolved Oxygen	Good	Good (2015)
		Phosphate	Moderate	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor livestock management (for macrophytes and phytobenthos combined and phosphate)		

Table B8: Lower Culm water body data

Water Body Details	**Water body name**		Lower Culm	
	Water body ID		GB108045014970	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Clyst and Culm	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Nitrates directive – Mid Devon	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification (2022)**	**Objective (year)**
	Biological	Fish	Good	Good (2021)
		Invertebrates	Moderate	Good (2027)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	Supports good	Supports Good (2015)
	Physico-chemical Specific pollutants	Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2027)
		Temperature	Good	Good (2015)
		pH	High	Good (2015)
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor livestock management (for Macrophytes and phytobenthos combined, phosphate and invertebrates).		
		Sewage discharge (continuous) (for invertebrates, phosphate and macrophytes and phytobenthos combined)		
		Trade/industry (for invertebrates and phosphate)		

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Table B9: Madford river water body data

Water Body Details	**Water body name**		Madford river	
	Water body ID		GB108045014920	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Clyst and Culm	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		No data	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Moderate	Good (2015)
		Invertebrates	Good	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	High	Supports Good (2015)
	Physico-chemical Specific pollutants	Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	Copper	-	High (2015)
		Iron	-	High (2015)
		Zinc	-	High (2015)
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor Soil management (for phosphate and macrophytes and phytobenthos combined)		
		Poor Nutrient management (for phosphate and Macrophytes and Phytobenthos Combined		
		Sewage discharge (continuous) (for Macrophytes and Phytobenthos Combined and phosphate)		
		Farm/site infrastructure (for macrophytes and phytobenthos combined)		

Table B10: Middle Culm Water body status

Water Body Details	**Water body name**		Middle Culm	
	Water body ID		GB108045014980	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Clyst and Culm	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Nitrates Directive – Mid Devon	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (Fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Moderate	Good (2015)
		Invertebrates	Good	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	High	Supports good (2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	Copper	-	-
		Iron	-	-
		Zinc	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good (2019)	Good (2015)
		Dioxins and dioxin-like compounds	Good (2019)	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good (2019)	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good (2019)	Good (2015)
		Hexachlorobenzene	Good (2019)	Good (2015)
		Hexachlorobutadiene	Good (2019)	Good (2015)
		Mercury and Its Compounds	Fail (2019)	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good (2019)	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail (2019)	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good (2019)	Good (2015)
		Fluoranthene	Good (2019)	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor Nutrient management (for Macrophytes and phytobenthos combined, phosphate)		
		Poor Soil management (for Macrophytes and phytobenthos combined, phosphate)		
		Poor livestock management (for Macrophytes and phytobenthos combined, phosphate)		
		Riparian/in-river activities (inc bankside erosion) (if Macrophytes and phytobenthos)		

Table B11: Polly Brook Water body status

Water Body Details	**Water body name**		Polly Brook	
	Water body ID		GB108045008980	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Clyst and Culm	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Nitrates Directive: Mid Devon Special Area of Conservation: East Devon Pebblebed Healths SAC.	
	Ecological Status (2022)		Good	
	Chemical Status (2022)		Does not require assessment (Fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	-	-
		Invertebrates	High	Good (2015)
		Macrophytes and Phytobenthos combined	Poor	Good (2027)
	Hydromorphological	Hydrological Regime	Supports good	Supports good (2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Ammonia	-	Good (2015)
		Dissolved Oxygen	-	Good (2015)
		Phosphate	-	Good (2027)
		Temperature	-	Good (2015)
		pH	-	Good (2015)
	Specific Pollutants	Copper	-	-
		Iron	-	-
		Zinc	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessme	Reasons for not achieving Good Status	Poor livestock management (for macrophytes and phytobenthos combined)		

Table B12: Sheldon stream Water body status

Water Body Details	**Water body name**	Sheldon Stream		
	Water body ID	GB108045014940		
	Water body type	River		
	Management catchment	East Devon		
	Operational catchment	Clyst and Culm		
	Hydromorphological designation	not designated artificial or heavily modified		
	Sensitive habitats / Protected Areas	Nitrates Directive: Mid Devon		
	Ecological Status (2022)	Moderate		
	Chemical Status (2022)	Does not require assessment (2022)		
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Moderate	Good (2027)
		Invertebrates	High	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	Supports Good	Supports Good (2015)
		Morphology	Supports Good	-
	Physico-chemical Specific pollutants	Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2015)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	Copper	-	-
		Iron	-	-
		Zinc	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor soil management (for Macrophytes and Phytobenthos combined, Phosphate, Fish)		
		Poor nutrient management (for Macrophytes and Phytobenthos combined, Phosphate, Fish)		
		Barriers – ecological discontinuity (for Fish)		

Table B13: Upper Clyst Water body status

Water Body Details	**Water body name**		Upper Clyst	
	Water body ID		GB108045008860	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Clyst and Culm	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Nitrates Directive – Mid Devon, Clyst NVZ and Aylesbeare Stream NVZ	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (Fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Moderate	Good (2027)
		Invertebrates	Good	Good (2015)
		Macrophytes and Phytobenthos combined	Good	Good (2015)
	Hydromorphological	Hydrological Regime	Supports Good	Supports Good (2015)
		Morphology	Supports Good	-
	Physico-chemical Specific pollutants	Ammonia	High	Good (2015)
		Dissolved Oxygen	Poor	Good (2027)
		Phosphate	Poor	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	2,4-dichlorophenoxyacetic acid	High	Good (2015)
		Copper	High	Good (2015)
		Iron	-	-
		Zinc	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor livestock management (for dissolved oxygen, phosphate and fish		
		Barriers – ecological discontinuity (for fish)		

Table B14: Upper Cranny Brook Water body status

Water Body Details	**Water body name**		Upper Cranny Brook	
	Water body ID		GB108045008810	
	Water body type		River	
	Management catchment		East Devon	
	Operational catchment		Clyst and Culm	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Nitrates Directive – Mid Devon	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (Fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Moderate	Good (2027)
		Invertebrates	High	Good (2015)
		Macrophytes and Phytobenthos combined	Good	Good (2021)
	Hydromorphological	Hydrological Regime	Supports Good	Supports Good (2015)
		Morphology	Supports Good	-
	Physico-chemical Specific pollutants	Ammonia	Good	Good (2015)
		Dissolved Oxygen	High	Good (2027)
		Phosphate	Poor	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	2,4-dichlorophenoxyacetic acid	-	-
		Copper	-	-
		Iron	-	-
		Zinc	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor soil management (for fish)		
		Poor livestock management (for phosphate)		
		Urbanisation – urban development (for phosphate and fish)		
		Barriers – ecological discontinuity (for fish)		

Table B15: Weaver Water body status

Water Body Details	**Water body name**		Weaver	
	Water body ID		GB108045009110	
	Water body type		River	
	Management catchment		East Devon	
	Operational catchment		Clyst and Culm	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Nitrates Directive – Mid Devon and River Weaver NVZ	
	Ecological Status (2022)		Bad	
	Chemical Status (2022)		Does not require assessment (Fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Bad	Good (2027)
		Invertebrates	Poor	Good (2027)
		Macrophytes and Phytobenthos combined	Poor	Good (2021)
	Hydromorphological	Hydrological Regime	Supports Good	Supports Good (2015)
		Morphology	Supports Good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	High	
		Ammonia	High	Good (2015)
		Dissolved Oxygen	Good	Good (2027)
		Phosphate	Poor	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	2,4-dichlorophenoxyacetic acid	-	-
		Copper	-	-
		Iron	-	-
		Zinc	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor livestock management (for invertebrates and phosphate)		
		Poor nutrient management (for invertebrates)		

Table B16: Alphin Brook Water body status

Water Body Details	**Water body name**		Alphin Brook	
	Water body ID		GB108045009020	
	Water body type		River	
	Management catchment		East Devon	
	Operational catchment		Creedy and West Exe	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Nitrates Directive – Mid Devon Special Protection Area – Exe estuary Ramsar Site – Exe Estuary	
	Ecological Status (2022)		Good	
	Chemical Status (2022)		Does not require assessment (Fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	-	Good (2027)
		Invertebrates	High	Good (2027)
		Macrophytes and Phytobenthos combined	-	Good (2021)
	Hydromorphological	Hydrological Regime	High	Supports Good (2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	-	
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2027)
		Phosphate	Good	Good (2027)
		Temperature	Good	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	2,4-dichlorophenoxyacetic acid	-	-
		Copper	High	-
		Iron	-	-
		Zinc	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	No sector/activity stated		

Table B17: Jackmoor Water body status

Water Body Details	**Water body name**		Jackmoor	
	Water body ID		GB108045009080	
	Water body type		River	
	Management catchment		East Devon	
	Operational catchment		Creedy and West Exe	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Nitrates directive – Mid Devon	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (Fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	High	Good (2027)
		Invertebrates	High	Good (2027)
		Macrophytes and Phytobenthos combined	Moderate	Good (2021)
	Hydromorphological	Hydrological Regime	High	Supports Good (2015)
		Morphology	Supports Good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	High	-
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2027)
		Phosphate	Moderate	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	Chromium	High	High (2015)
		Copper	High	High (2015)
		Iron	High	High (2015)
		Manganese	High	High (2015)
		Pendimethalin	High	High (2015)
		Zinc	High	High (2015)
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Benzo(b)fluoranthene	Good	Good (2015)
		Benzo(g-h-i)perylene	Good	Good (2015)
		Benzo(k)fluoranthene	Good	Good (2015)
		Cadmium and Its Compounds	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Hexachlorocyclohexane	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Nonylphenol	Good	Good (2015)
		Pentachlorobenzene	Good	Good (2015)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
		Quinoxyfen	Good	Good (2015)
		Tributyltin Compounds	Good	Good (2015)
	Priority substances	1,2-dichloroethane	Good	Good (2015)
		Aclonifen	Good	Good (2015)
		Alachlor	Good	Good (2015)
		Benzene	Good	Good (2015)
		Bifenox	Good	Good (2015)
		Cybutryne	Good	Good (2015)
		Cypermethrin (Priority)	Good	Good (2015)
		Dichloromethane	Good	Good (2015)

		Dichlorvos (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
		Lead and Its Compounds	Good	Good (2015)
		Nickel and Its Compounds	Good	Good (2015)
		Terbutryn	Good	Good (2015)
		Trichloromethane	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Septic Tanks (for macrophytes and phytobenthos combined)		
		Poor livestock management (for macrophytes and phytobenthos combined)		
		Sewage discharge (continuous) (for macrophytes and phytobenthos combined)		

Table B18: Lower Creedy Water body status

Water Body Details	**Water body name**		Lower Creedy	
	Water body ID		GB108045009070	
	Water body type		River	
	Management catchment		East Devon	
	Operational catchment		Creedy and West Exe	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Nitrates Directive – Mid Devon Urban Waste Water Treatment Directive – River Creedy	
	Ecological Status (2022)		Bad	
	Chemical Status (2022)		Does not require assessment (Fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Bad	Good (2015)
		Invertebrates	High	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	Supports Good	Supports Good (2015)
		Morphology	Supports Good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	-	-
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2027)
		Temperature	Good	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	2,4-dichlorophenoxyacetic acid	-	-
		Copper	High	High (2015)
		Iron	-	-
		Zinc	High	High (2015)
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
		Lead and its compounds	Good	Good (2015)
		Nickel and its compounds	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Septic Tanks (for phosphate and macrophytes and phytobenthos combined)		
		Poor Nutrient management (macrophytes and phytobenthos combined)		
		Poor Soil management (For phosphate and macrophytes and phytobenthos combined)		
		Sewage discharge (continuous) (for phosphate and macrophytes and phytobenthos combined)		

Table B19: Exe (Creedy to Estuary) Water body status

Water Body Details	**Water body name**		Exe (Creedy to Estuary)	
	Water body ID		GB108045009040	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Exe Main	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Nitrates Directive – Mid Devon Urban waste water treatment directive – River Creedy	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (Fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	High	Good (2015)
		Invertebrates	-	-
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	Supports good	Supports Good (2015)
		Morphology	--	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	High	Good (2015)
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2027)
		Temperature	Good	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	Arsenic	High	High (2015)
		Copper	High	High (2015)
		Iron	High	High (2015)
		Manganese	High	High (2015)
		Pendimethalin	High	High (2015)
		Zinc	High	High (2015)
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Cadmium and its compounds	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Hexachlorocyclohexane	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
		Quinoxyfen	Good	Good (2015)
	Priority substances	Aclonifen	Good	Good (2015)
		Alachlor	Good	Good (2015)
		Bifenox	Good	Good (2015)
		Cybutryne	Good	Good (2015)
		Cypermethrin (Priority)	Good	Good (2015)
		Dichlorvos (Priority)	Fail	Good (2039)
		Fluoranthene	Good	Good (2015)
		Lead and Its Compounds	Good	Good (2015)
		Nickel and Its Compounds	Good	Good (2015)
	Other Pollutants	Aldrin, Dieldrin, Endrin & Isodrin	Good	Good (2015)
		para - para DDT	Good	Good (2015)

Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor livestock management (for macrophytes and phytobenthos combined and phosphate)
		Sewage Discharge (continuous) – for macrophytes and phytobenthos combined and phosphate

Table B20: Exe (Culm to Creedy) Water body status

Water Body Details	**Water body name**		Exe (Culm to Creedy)	
	Water body ID		GB108045009060	
	Water body type		River	
	Management catchment		East Devon	
	Operational catchment		Exe Main	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Drinking water protected Areas - EXE - GB108045009060	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (Fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	-	-
		Invertebrates	High	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	Supports Good	Supports Good (2015)
		Morphology	-	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	-	
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	2,4-dichlorophenoxyacetic acid	-	-
		Copper	-	-
		Iron	-	-
		Zinc	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Mercury and Its Compounds	High	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor Nutrient management (for phosphate and macrophytes and phytobenthos combined)		
		Poor soil management (for phosphate and macrophytes and phytobenthos combined)		
		Sewage discharge (continuous) (for phosphate and macrophytes and phytobenthos combined)		

Table B21: Exe (Barle to Culm) Water body status

Water Body Details	**Water body name**		Exe (Barle to Culm)	
	Water body ID		GB108045015050	
	Water body type		River	
	Management catchment		East Devon	
	Operational catchment		Exe main	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Nitrates directive – Mid Devon Safeguard zone – River Exe Drinking water protected area - EXE - GB108045015050	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (Fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	-	-
		Invertebrates	High	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	Supports Good	Supports Good (2015)
		Morphology	Supports Good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	High	Good (2015)
		Ammonia	High	Good (2015)
		Biochemical Oxygen Demand (BOD)	High	-
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Good	Good (2015)
		Temperature	Good	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	Arsenic	High	High (2015)
		Chlorothalonil	High	High (2015)
		Chromium (VI)	High	High (2015)
		Copper	High	High (2015)
		Diazinon	High	High (2015)
		Iron	High	High (2015)
		Manganese	High	High (2015)
		Pendimethalin	High	High (2015)
		Zinc	High	High (2015)
Chemical	Priority hazardous substances	Anthracene	Good	Good (2015)
		Benzo(a)pyrene	Good	Good (2015)
		Benzo(g-h-i)perylene	Good	Good (2015)
		Benzo(k)fluoranthene	Good	Good (2015)
		Benzo(b)fluoranthene	Good	Good (2015)
		Cadmium and Its Compounds	Good	Good (2015)
		Di(2-ethylhexyl)phthalate (Priority hazardous)	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Hexachlorocyclohexane	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Nonylphenol	Good	Good (2015)
		Pentachlorobenzene	Good	Good (2015)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)

		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
		Quinoxyfen	Good	Good (2015)
		Tributyltin Compounds	Good	Good (2015)
	Priority substances	1,2-dichloroethane	Good	Good (2015)
		Aclonifen	Good	Good (2015)
		Alachlor	Good	Good (2015)
		Benzene	Good	Good (2015)
		Bifenox	Good	Good (2015)
		Cybutryne	Good	Good (2015)
		Cypermethrin (Priority)	Good	Good (2015)
		Dichloromethane	Good	Good (2015)
		Dichlorvos (Priority)	Good	Good (2015)
		Diuron	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
		Lead and Its Compounds	Good	Good (2015)
		Nickel and Its Compounds	Good	Good (2015)
		Octylphenol	Good	Good (2015)
		Trichloromethane	Good	Good (2015)
	Other Pollutants	Aldrin, Dieldrin, Endrin & Isodrin	Good	Good (2015)
		Carbon Tetrachloride	Good	Good (2015)
		DDT Total	Good	Good (2015)
		para - para DDT	Good	Good (2015)
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor pesticide management (for macrophytes and phytobenthos combined)		
		Poor nutrient management (for macrophytes and phytobenthos combined)		
		Poor soil management (for macrophytes and phytobenthos combined)		
		Septic tanks (for macrophytes and phytobenthos combined)		
		Riparian/in-river activities (including bankside erosion) (for macrophytes and phytobenthos combined)		
		Sewage discharge (intermittent) (for macrophytes and phytobenthos combined)		

Table B22: Blackwater River Water body status

Water Body Details	**Water body name**		Blackwater River	
	Water body ID		GB108045008850	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Lim and Axe	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		-	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (Fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Good	-
		Invertebrates	Good	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	High	Supports good (2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	-	-
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	2,4-dichlorophenoxyacetic acid	-	-
		Copper	-	-
		Iron	-	-
		Zinc	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor soil management (for macrophytes and phytobenthos combined and phosphate)		
		Poor nutrient management (for macrophytes and phytobenthos combined and phosphate)		
		Poor livestock management (for macrophytes and phytobenthos combined and phosphate)		
		Sewage discharge (continuous) (for macrophytes and phytobenthos combined)		

Table B23: Branscombe stream Water body status

Water Body Details	**Water body name**		Branscombe Stream	
	Water body ID		GB108045008630	
	Water body type		River	
	Management catchment		Devon east	
	Operational catchment		Lim and Axe	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Nitrates Directive – Branscombe Special Area of conservation – Sidmouth to West Bay SAC	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (Fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	-	-
		Invertebrates	High	High
		Macrophytes and Phytobenthos combined	Moderate	Moderate
	Hydromorphological	Hydrological Regime	Supports good	Supports good
		Morphology	Supports good	Supports good
	Physico-chemical Specific pollutants	Acid neutralising capacity	-	-
		Ammonia	High	High
		Dissolved Oxygen	High	High
		Phosphate	Good	Good
		Temperature	High	High
		pH	High	High
	Specific Pollutants	2,4-dichlorophenoxyacetic acid	-	-
		Copper	-	-
		Iron	-	-
		Zinc	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good
		Dioxins and dioxin-like compounds	Good	Good
		Heptachlor and cis-Heptachlor epoxide	Good	Good
		Hexabromocyclododecane (HBCDD)	Good	Good
		Hexachlorobenzene	Good	Good
		Hexachlorobutadiene	Good	Good
		Mercury and Its Compounds	Fail	Fail
		Perfluorooctane sulphonate (PFOS)	Good	Good
		Polybrominated diphenyl ethers (PBDE)	Fail	Fail
	Priority substances	Cypermethrin (Priority)	Good	Good
		Fluoranthene	Good	Good
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Septic Tanks (for Macrophytes and Phytobenthos Combined)		
		Poor livestock management (Macrophytes and Phytobenthos Combined)		

Table B24: Corry Brooke stream Water body status

Water Body Details	**Water body name**		Corry Brooke	
	Water body ID		GB108045009300	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Lim and Axe	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		-	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Moderate	Good (2015)
		Invertebrates	Good	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	High	Supports good (2015)
		Morphology	Supports Good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	High	Good (2015)
		Ammonia	Good	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2027)
		Temperature	Good	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	2,4-dichlorophenoxyacetic acid	-	-
		Chlorothalonil	High	High (2015)
		Chromium (VI)	High	High (2015)
		Copper	High	High (2015)
		Iron	High	High (2015)
		Manganese	High	High (2015)
		Pendimethalin	High	High (2015)
		Zinc	High	High (2015)
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Benzo(g-h-i)perylene	Fail	Good (2033)
		Benzo(k)fluoranthene	Good	Good (2015)
		Cadmium and Its Compounds	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Hexachlorocyclohexane	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Nonylphenol	Good	Good (2015)
		Pentachlorobenzene	Good	Good (2015)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
		Quinoxyfen	Good	Good (2015)
		Tributyltin Compounds	Good	Good (2015)
	Priority substances	1,2-dichloroethane	Good	Good (2015)
		Aclonifen	Good	Good (2015)
		Alachlor	Good	Good (2015)
		Benzene	Good	Good (2015)
		Bifenox	Good	Good (2015)

		Cybutryne	Good	Good (2015)
		Cypermethrin (Priority)	Good	Good (2015)
		Dichloromethane	Good	Good (2015)
		Dichlorvos (Priority)	Good	Good (2015)
		Diuron	Good	Good (2015)
	Other Pollutants	Carbon Tetrachloride	Good	Good (2015)
		DDT Total	Good	Good (2015)
		para - para DDT	Good	Good (2015)
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor soil management (Macrophytes and Phytobenthos Combined)		
		Riparian/in-river activities (inc bankside erosion) for (Macrophytes and Phytobenthos Combined and phosphate).		
		Poor nutrient management (for phosphate)		
		Sewage discharge (continuous) (for Water industry)		

Table B25: Forton Brook Water body status

Water Body Details	**Water body name**		Forton Brook	
	Water body ID		GB108045014820	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Lim and Axe	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Nitrates Directive - chard	
	Ecological Status (2022)		Bad	
	Chemical Status (2022)		Does not require assessment (fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Bad	Good(2027)
		Invertebrates	High	Good(2015)
		Macrophytes and Phytobenthos combined	-	-
	Hydromorphological	Hydrological Regime	Supports good	Supports Good(2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	-	-
		Ammonia	High	Good(2015)
		Dissolved Oxygen	High	Good(2015)
		Phosphate	Moderate	Good(2015)
		Temperature	High	Good(2015)
		pH	High	Good(2015)
	Specific Pollutants	2,4-dichlorophenoxyacetic acid	-	-
		Chlorothalonil	-	-
		Chromium (VI)	-	-
		Copper	-	-
		Iron	-	-
		Manganese	-	-
		Pendimethalin	-	-
		Zinc	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good(2015)
		Benzo(g-h-i)perylene	-	-
		Benzo(k)fluoranthene	-	-
		Cadmium and Its Compounds	-	-
		Dioxins and dioxin-like compounds	Good	Good(2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good(2015)
		Hexabromocyclododecane (HBCDD)	Good	Good(2015)
		Hexachlorobenzene	Good	Good(2015)
		Hexachlorobutadiene	Good	Good(2015)
		Hexachlorocyclohexane	-	-
		Mercury and Its Compounds	Fail	Good(2040)
		Nonylphenol	-	-
		Pentachlorobenzene	-	-
		Perfluorooctane sulphonate (PFOS)	Good	Good(2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good(2063)
		Quinoxyfen	-	-
		Tributyltin Compounds	-	-
	Priority substances	Cypermethrin (Priority)	Goof	Good(2015)
		Dichloromethane	-	-
		Fluoranthene	Good	Good(2015)
		Diuron	-	-
	Other Pollutants	-	Does not require assessment	Does not require assessment

Mitigation Measures Assessment	Reasons for not achieving Good Status	Barriers – ecological discontinuity (for fish)

Table B26: Kit Brook Water body status

Water Body Details	**Water body name**		Kit Brook	
	Water body ID		GB108045014830	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Lim and Axe	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Nitrates Directive – Chard	
	Ecological Status (2022)		Good	
	Chemical Status (2022)		Does not require assessment (fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Good	Good (2027)
		Invertebrates	Good	Good (2015)
		Macrophytes and Phytobenthos combined	Good	Good (2015)
	Hydromorphological	Hydrological Regime	Supports good	Supports Good (2015)
		Morphology	-	--
	Physico-chemical Specific pollutants	Acid neutralising capacity	-	Good (2015)
		Ammonia	Good	Good (2015)
		Dissolved Oxygen	Good	Good (2015)
		Phosphate	Good	Good (2015)
		Temperature	Good	Good (2015)
		pH	Good	Good (2015)
	Specific Pollutants	-	Not Assessed	Good (2015)
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Benzo(g-h-i)perylene	-	Good (2015)
		Benzo(k)fluoranthene	-	Good (2015)
		Cadmium and Its Compounds	-	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Hexachlorocyclohexane	-	Good (2015)
		Mercury and Its Compounds	Fail	Good (2015)
		Nonylphenol	-	Good (2015)
		Pentachlorobenzene	Good	Good (2015)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	**Fail**	Good (2015)
		Quinoxyfen	-	Good (2015)
		Tributyltin Compounds	-	Good (2015)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Dichloromethane	-	Good (2015)
		Fluoranthene	Good	Good (2015)
		Diuron	-	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation	Reasons for not achieving Good Status	Poor soil management (for fish)		

		Poor livestock management (for macrophytes and phytobenthos combined)
		Poor nutrient management (for macrophytes and phytobenthos combined)

Table B27: Lim Water body status

Water Body Details	**Water body name**		Lim	
	Water body ID		GB108044009760	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Lim and Axe	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Special Area of Conservation – Sidmouth to West Bay SAC	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	-	-
		Invertebrates	High	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	Supports good	Supports good (2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	-	-
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Good	Good (2015)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	-	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Hexachlorocyclohexane	-	-
		Mercury and Its Compounds	Fail	Good (2015)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	**Fail**	Good (2015)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Riparian/in-river activities (inc bankside erosion) (for Macrophytes and Phytobenthos Combined)		
		Poor oil management (Macrophytes and Phytobenthos Combined)		
		Misconnections (Macrophytes and Phytobenthos Combined)		
		Sewage discharge (intermittent) (Macrophytes and Phytobenthos Combined)		
		Urbanisation (urban development) (for Macrophytes and Phytobenthos Combined)		

Table B28: Lim Water body status

Water Body Details	**Water body name**		Lim	
	Water body ID		GB108045008870	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Lim and Axe	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Special Area of Conservation (River Axe SAC)	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	High	Good (2027)
		Invertebrates	Moderate	Good (2015)
		Macrophytes and Phytobenthos combined	-	Good (2027)
	Hydromorphological	Hydrological Regime	Supports good	Supports good (2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	-	Good (2015)
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2015)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	2,4-dichlorophenoxyacetic acid	-	-
		Arsenic	High	High (2015)
		Chlorothalonil	High	High (2015)
		Chromium (VI)	High	High (2015)
		Copper	High	High (2015)
		Iron	High	High (2015)
		Manganese	High	High (2015)
		Pendimethalin	High	High (2015)
		Zinc	High	High (2015)
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	High (2015)
		Benzo(g-h-i)perylene	Fail	Good (2015)
		Benzo(k)fluoranthene	Good	Good (2015)
		Cadmium and Its Compounds	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Hexachlorocyclohexane	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2015)
		Nonylphenol	Good	Good (2015)
		Pentachlorobenzene	Good	Good (2015)
		Perfluorooctane sulphonate (PFOS)	Fail	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2015)
		Quinoxyfen	Good	Good (2015)
		Tributyltin Compounds	Good	Good (2015)
	Priority substances	1,2-dichloroethane	Good	Good (2015)
		Aclonifen	Good	Good (2015)
		Alachlor	Good	Good (2015)
		Benzene	Good	Good (2015)
		Bifenox	Good	Good (2015)
		Cybutryne	Good	Good (2015)
		Cypermethrin (Priority)	Good	Good (2015)

		Dichloromethane	Good	Good (2015)
		Dichlorvos (Priority)	Good	Good (2015)
		Diuron	Good	Good (2015)
	Other Pollutants	Carbon Tetrachloride	Good	Good (2015)
		DDT Total	Good	Good (2015)
		para - para DDT	Good	Good (2015)
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor livestock management (for macrophytes and phytobenthos combined and phosphate)		
		Sewage discharge (continuous) (for macrophytes and phytobenthos combined and phosphate)		
		Trade/industry discharge (for macrophytes and phytobenthos combined and phosphate)		

Table B29: Lower Axe Water body status

Water Body Details	**Water body name**		Lower Axe	
	Water body ID		GB108045008870	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Lim and Axe	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Special area of conservation (River Axe SAC)	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	-	Good (2027)
		Invertebrates	Moderate	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	Supports good	Supports good (2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	High	Good (2015)
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2015)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	2,4-dichlorophenoxyacetic acid	-	-
		Arsenic	High	High (2015)
		Chlorothalonil	High	High (2015)
		Chromium (VI)	High	High (2015)
		Copper	High	High (2015)
		Iron	High	High (2015)
		Manganese	High	High (2015)
		Pendimethalin	High	High (2015)
		Zinc	High	High (2015)
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	High (2015)
		Benzo(g-h-i)perylene	Fail	Good (2033)
		Benzo(k)fluoranthene	Good	Good (2015)
		Cadmium and Its Compounds	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Hexachlorocyclohexane	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2015)
		Nonylphenol	Good	Good (2015)
		Pentachlorobenzene	Good	Good (2039)
		Perfluorooctane sulphonate (PFOS)	Fail	Good (2063)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2015)
		Quinoxyfen	Good	Good (2015)
		Tributyltin Compounds	Good	Good (2015)
	Priority substances	1,2-dichloroethane	Good	Good (2015)
		Aclonifen	Good	Good (2015)
		Alachlor	Good	Good (2015)
		Benzene	Good	Good (2015)
		Bifenox	Good	Good (2015)
		Cybutryne	Good	Good (2015)
		Cypermethrin (Priority)	Good	Good (2015)

		Dichloromethane	Good	Good (2015)
		Dichlorvos (Priority)	Good	Good (2015)
		Diuron	Good	Good (2015)
	Other Pollutants	Carbon Tetrachloride	Good	Good (2015)
		DDT Total	Good	Good (2015)
		para - para DDT	Good	Good (2015)
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor livestock management (for macrophytes and phytobenthos combined and phosphate)		
		Sewage discharge (continuous) (for macrophytes and phytobenthos combined and phosphate)		
		Trade/industry discharge (for macrophytes and phytobenthos combined and phosphate)		

Table B30: Lower Coly Water body status

Water Body Details	**Water body name**		Lower Coly	
	Water body ID		GB108045008790	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Lim and Axe	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		None shown	
	Ecological Status (2022)		Poor	
	Chemical Status (2022)		Does not require assessment (fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Moderate	Poor
		Invertebrates	Good	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	Supports good	Supports good (2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	-	-
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	-	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Hexachlorocyclohexane	-	-
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor livestock management (For phosphate, fish and macrophytes and phytobenthos combined)		
		Incidents (for fish)		
		Reservoir/Impoundment – non flow related (for fish)		

Table B31: Offwell Brook Water body status

Water Body Details	**Water body name**	Offwell Brook		
	Water body ID	GB108045008840		
	Water body type	River		
	Management catchment	Devon East		
	Operational catchment	Lim and Axe		
	Hydromorphological designation	not designated artificial or heavily modified		
	Sensitive habitats / Protected Areas	None shown		
	Ecological Status (2022)	Moderate		
	Chemical Status (2022)	Does not require assessment (fail in 2019)		
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Good	Poor
		Invertebrates	High	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	High	Supports good (2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	-	-
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	-	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Hexachlorocyclohexane	-	-
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
		0		
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor livestock management (for phosphate and macrophytes and phytobenthos combined)		
		Sewage discharge (continuous) (for phosphate and macrophytes and phytobenthos combined)		

Table B32: Umborne Brook Water body status

Water Body Details	**Water body name**	Umborne Brook
	Water body ID	GB108045008880
	Water body type	River
	Management catchment	Devon East
	Operational catchment	Lim and Axe
	Hydromorphological designation	not designated artificial or heavily modified
	Sensitive habitats / Protected Areas	None shown
	Ecological Status (2022)	Moderate
	Chemical Status (2022)	Does not require assessment (fail in 2019)

	Quality elements	**Elements**	**Classification**	**Objective (year)**
Ecological	Biological	Fish	Good	Poor
		Invertebrates	High	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	High	Supports good (2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	-	-
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	-	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Hexachlorocyclohexane	-	-
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment

Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor livestock management (for phosphate and macrophytes and phytobenthos combined)
		Sewage discharge (continuous) (for phosphate and macrophytes and phytobenthos combined)

Table B33: Upper Coly Water body status

Water Body Details	**Water body name**		Upper Coly	
	Water body ID		GB108045008830	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Lim and Axe	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		None shown	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Moderate	Poor
		Invertebrates	High	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	High	Supports good (2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	-	-
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	-	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Hexachlorocyclohexane	-	-
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor livestock management (for phosphate)		

Table B34: Upper Coly Water body status

Water Body Details	**Water body name**		Yarty	
	Water body ID		GB108045015130	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Lim and Axe	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		None shown	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Good	Poor
		Invertebrates	High	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	High	Supports good (2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	High	Good (2015)
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	Chlorothalonil	High	High (2015)
		Chromium (VI)	High	High (2015)
		Copper	High	High (2015)
		Iron	High	High (2015)
		Manganese	High	High (2015)
		Pendimethalin	High	High (2015)
		Permethrin	High	High (2015)
		Zinc	High	High (2015)
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Benzo(b)fluoranthene	Good	Good (2015)
		Benzo(g-h-i)perylene	Fail	Good (2015)
		Benzo(k)fluoranthene	Good	Good (2015)
		Cadmium and Its Compounds	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Hexachlorocyclohexane	-	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Nonylphenol	Good	Good (2015)
		Pentachlorobenzene	Good	Good (2015)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
		Quinoxyfen	Good	Good (2015)
		Tributyltin Compounds	Good	Good (2015)
	Priority substances	1,2-dichloroethane	Good	Good (2015)
		Aclonifen	Good	Good (2015)
		Alachlor	Good	Good (2015)
		Benzene	Good	Good (2015)

		Bifenox	Good	Good (2015)
		Cybutryne	Good	Good (2015)
		Cypermethrin (Priority)	Good	Good (2015)
		Dichloromethane	Good	Good (2015)
		Dichlorvos (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
		Lead and Its Compounds	Good	Good (2015)
		Nickel and Its Compounds	Good	Good (2015)
		Terbutryn	Good	Good (2015)
		Trichloromethane	Good	Good (2015)
	Other Pollutants	Carbon Tetrachloride	Good	Good (2015)
		DDT Total	Good	Good (2015)
		para - para DDT	Good	Good (2015)
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor livestock management (for phosphate and macrophytes and phytobenthos combined)		
		Poor soil management (for phosphate and macrophytes and phytobenthos combined)		
		Poor nutrient management (for phosphate and macrophytes and phytobenthos combined)		

Table B34: Love stream water body data

Water Body Details	**Water body name**		Love	
	Water body ID		GB108045015110	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Sid and Otter	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		None shown	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	-	Poor
		Invertebrates	High	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	High	Supports good (2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	-	-
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	-	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Hexachlorocyclohexane	-	-
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor livestock management (for macrophytes and phytobenthos combined and phosphate)		
		Poor nutrient management (for macrophytes and phytobenthos combined and phosphate)		
		Poor soil management (for macrophytes and phytobenthos combined and phosphate)		
		Sewage discharge (discontinuous) (for macrophytes and phytobenthos combined and phosphate)		

Table B35: Lower river Otter stream water body data

Water Body Details	**Water body name**		Lower River Otter	
	Water body ID		GB108045009170	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Sid and Otter	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		None shown	
	Ecological Status (2022)		Poor	
	Chemical Status (2022)		Does not require assessment (fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Moderate	Good (2015)
		Invertebrates	High	Good (2015)
		Macrophytes and Phytobenthos combined	Poor	Good (2027)
	Hydromorphological	Hydrological Regime	Does not support good	Supports Good (2027)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	-	-
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	Arsenic	High	High (2015)
		Chlorothalonil	High	High (2015)
		Chromium (VI)	-	High (2015)
		Copper	High	High (2015)
		Iron	High	High (2015)
		Manganese	High	High (2015)
		Zinc	High	High (2015)
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Cadmium and Its Compounds	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Heptachlor and cis-Heptachlor epoxide	Good	Good (2015)
		Hexabromocyclododecane (HBCDD)	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Hexachlorocyclohexane	Good	Good (2015)
		Mercury and Its Compounds	Fail	Good (2040)
		Nonylphenol	-	-
		Pentachlorobenzene	-	-
		Perfluorooctane sulphonate (PFOS)	Fail	Good (2039)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
		Quinoxyfen	Good	Good (2015)
		Tributyltin Compounds	-	-
	Priority substances	1,2-dichloroethane	-	-
		Aclonifen	Good	Good (2015)
		Alachlor	Good	Good (2015)
		Benzene	-	-
		Bifenox	-	-
		Cybutryne	Good	Good (2015)
		Cypermethrin (Priority)	Good	Good (2015)
		Dichloromethane	-	-

		Dichlorvos (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
		Lead and Its Compounds	Good	Good (2015)
		Nickel and Its Compounds	Good	Good (2015)
		Terbutryn	Good	Good (2015)
		Trichloromethane	-	Good (2015)
	Other Pollutants	Aldrin, Dieldrin, Endrin & Isodr	Good	Good (2015)
		para - para DDT	Good	Good (2015)
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor livestock management (for phosphates and macrophytes and phytobenthos combined)		
		Poor soil management (for phosphates)		
		Sewage discharge (continuous) (for phosphates and macrophytes and phytobenthos combined)		

Table B36: Middle River Otter stream water body data

Water Body Details	**Water body name**		Middle River Otter	
	Water body ID		GB108045009180	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Sid and Otter	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		-	
	Ecological Status (2022)		Poor	
	Chemical Status (2022)		Does not require assessment (fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Poor	Poor
		Invertebrates	Good	Good (2015)
		Macrophytes and Phytobenthos combined	Poor	Good (2027)
	Hydromorphological	Hydrological Regime	Supports good	Supports good (2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	-	-
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2027)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	-	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Hexachlorocyclohexane	-	-
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Fail	Good (2039)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor livestock management (for macrophytes and phytobenthos combined and phosphate)		
		Poor nutrient management (for macrophytes and phytobenthos combined)		
		Poor soil management (for macrophytes and phytobenthos combined)		
		Sewage discharge (discontinuous) (for macrophytes and phytobenthos combined and phosphate)		

Table B37: Sid water body data

Water Body Details	**Water body name**		Sid	
	Water body ID		GB108045009160	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Sid and Otter	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		-	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	-	Poor
		Invertebrates	High	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	Supports good	Supports good (2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	-	-
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Good	Good (2015)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	-	-	-
	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Hexachlorocyclohexane	-	-
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Fail	Good (2039)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor livestock management (for macrophytes and phytobenthos combined)		
		Poor nutrient management (for macrophytes and phytobenthos combined)		
		Poor soil management (for macrophytes and phytobenthos combined)		
		Septic tanks (for macrophytes and phytobenthos combined)		

Table B38: Tale water body data

Water Body Details	**Water body name**		Tale	
	Water body ID		GB108045009200	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Sid and Otter	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		Nitrates directive – Mid Devon	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Good	Poor
		Invertebrates	Good	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	High	Supports good (2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	-	-
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2015)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	-	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Hexachlorocyclohexane	-	-
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor livestock management (for macrophytes and phytobenthos combined and phosphate)		
		Poor nutrient management (for phosphate)		
		Poor soil management (for phosphate)		
		Sewage discharge (for macrophytes and phytobenthos combined and phosphate)		

Table B39: Upper River otter water body data

Water Body Details	**Water body name**		Upper River Otter	
	Water body ID		GB108045015120	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Sid and Otter	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		-	
	Ecological Status (2022)		Moderate	
	Chemical Status (2022)		Does not require assessment (fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Moderate	Poor
		Invertebrates	Good	Good (2015)
		Macrophytes and Phytobenthos combined	Moderate	Good (2027)
	Hydromorphological	Hydrological Regime	Supports good	Supports good (2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	-	-
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2015)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	-	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Hexachlorocyclohexane	-	-
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor livestock management (for macrophytes and phytobenthos combined and phosphate)		
		Poor nutrient management (for macrophytes and phytobenthos combined and phosphate)		
		Poor soil management (for macrophytes and phytobenthos combined and phosphate)		
		Sewage discharge (for macrophytes and phytobenthos combined and phosphate)		

Table B39: Wolf (otter) water body data

Water Body Details	**Water body name**		Wolf (Otter)	
	Water body ID		GB108045009190	
	Water body type		River	
	Management catchment		Devon East	
	Operational catchment		Sid and Otter	
	Hydromorphological designation		not designated artificial or heavily modified	
	Sensitive habitats / Protected Areas		-	
	Ecological Status (2022)		Poor	
	Chemical Status (2022)		Does not require assessment (fail in 2019)	
Ecological	**Quality elements**	**Elements**	**Classification**	**Objective (year)**
	Biological	Fish	Good	Poor
		Invertebrates	High	Good (2015)
		Macrophytes and Phytobenthos combined	Poor	Good (2027)
	Hydromorphological	Hydrological Regime	High	Supports good (2015)
		Morphology	Supports good	-
	Physico-chemical Specific pollutants	Acid neutralising capacity	-	-
		Ammonia	High	Good (2015)
		Dissolved Oxygen	High	Good (2015)
		Phosphate	Moderate	Good (2015)
		Temperature	High	Good (2015)
		pH	High	Good (2015)
	Specific Pollutants	-	-	-
Chemical	Priority hazardous substances	Benzo(a)pyrene	Good	Good (2015)
		Dioxins and dioxin-like compounds	Good	Good (2015)
		Hexachlorobenzene	Good	Good (2015)
		Hexachlorobutadiene	Good	Good (2015)
		Hexachlorocyclohexane	-	-
		Mercury and Its Compounds	Fail	Good (2040)
		Perfluorooctane sulphonate (PFOS)	Good	Good (2015)
		Polybrominated diphenyl ethers (PBDE)	Fail	Good (2063)
	Priority substances	Cypermethrin (Priority)	Good	Good (2015)
		Fluoranthene	Good	Good (2015)
	Other Pollutants	-	Does not require assessment	Does not require assessment
Mitigation Measures Assessment	Reasons for not achieving Good Status	Poor livestock management (for macrophytes and phytobenthos combined and phosphate)		

Sites of Special Scientific Interest (SSSI) and Protected Species in East Devon District

APPENDIX C

Table C1: Sites of Special Scientific Interest (SSSI) in East Devon District Council Area

SSSI Name	Area covered within EDDC (hectares)
East Devon Pebblebed Heath	1134
Otter Estuary	32.15
Ladram Bay and Sidmouth	17.12
Sidmouth to Beer Coast	242.05
Axmouth to Lyme Regis Under Cliffs	321.
River Axe	69.51
Hense Moor	93.39
Brampford Speke	82.84

Table C2: Accepted observations of protected and red listed Species observed in East Devon from 2014-2024 (Source; NBN and JNCC, 2023).

Scientific name	Common name
Birds	
Alauda arvensis	Skylark
Anas acuta	Pintail
Anthus trivialis	Tree Pipit
Apus	Swift
Calidris alpina	Dunlin
Calidris pugnax	Ruff
Charadrius hiaticula	Ringed Plover
Chloris chloris	Greenfinch
Circus cyaneus	Hen Harrier
Clangula hyemalis	Long-tailed Duck
Cuculus canorus	Cuckoo
Delichon urbicum	House Martin
Emberiza cirlus	Cirl Bunting
Emberiza citrinella	Yellowhammer
Falco columbarius	Merlin
Gulosus aristotelis	Shag
Larus argentatus	Herring Gull
Limosa limosa	Black-tailed Godwit
Linaria cannabina	Linnet
Locustella naevia	Grasshopper Warbler
Melanitta nigra	Common Scoter
Motacilla flava	Yellow Wagtail
Muscicapa striata	Spotted Flycatcher
Numenius arquata	Curlew
Numenius phaeopus	Whimbrel
Passer domesticus	House Sparrow
Perdix perdix	Grey Partridge
Phylloscopus sibilatrix	Wood Warbler
Podiceps auritus	Slavonian Grebe
Poecile montanus	Willow Tit
Poecile palustris	Marsh Tit
Rissa tridactyla	Kittiwake
Saxicola rubetra	Whinchat
Scolopax rusticola	Woodcock
Sturnus vulgaris	Starling
Turdus iliacus	Redwing
Turdus pilaris	Fieldfare
Turdus torquatus	Ring Ouzel

Scientific name	Common name
Turdus viscivorus	Mistle Thrush
Vanellus vanellus	Lapwing
Alauda arvensis	Skylark
Fish (excluding purely marine species)	
Anguilla anguilla	European Eel
Petromyzon marinus	Sea Lamprey
Lampetra planeri	Brook Lamprey
Cottus gobio	Bullhead
Herptiles (amphibians and reptiles)	
Bufo	Common Toad
Lissotriton helveticus	Palmate Newt
Lissotriton vulgaris	Smooth Newt
Rana temporaria	Common Frog
Triturus cristatus	Great Crested Newt
Anguis fragilis	Slow-worm
Coronella austriaca	Smooth Snake
Natrix helvetica	Grass Snake
Vipera berus	Adder
Zootoca vivipara	Common Lizard
Mammals	
Capreolus	Roe Deer
Castor fiber	Beaver
Erinaceus europaeus	West European Hedgehog
Lutra lutra	Eurasian Otter
Meles	Eurasian Badger
Mustela erminea	Stoat
Myotis bechsteinii	Bechstein's Bat
Rhinolophus hippodiseros	Lesser Horseshoe Bat
Rhinolophus ferrumequinum	Greater Horseshoe Bat
Sorex araneus	Eurasian Common Shrew

Scientific name	Common name
Plants	
Hyacinthoides non-scripta	Bluebell
Orobanche hederae	Ivy Broomrape
Primula vulgaris	Primrose

Table C3: Accepted observations of Species of interest in East Devon from 2014-2024. This list includes species within the England NERC Section.41, Threatened and Near threatened species list, nationally notable; scare; and rare species (Source NBN and JNCC, 2023).

Scientific Name	Common Name
Birds	
Acanthis cabaret	Lesser Redpoll
Accipiter nisus	Sparrowhawk
Anas platyrhynchos	Mallard
Ardea cinerea	Grey Heron
Branta bernicla	Dark Bellied Brant Goose
Caprimulgus europaeus	Nightjar
Cinclus cinclus	Dipper
Circus aeruginosus	Marsh Harrier
Corvus frugilegus	Rook
Emberiza schoeniclus	Reed Bunting

Scientific Name	Common Name
Fulica atra	Coot
Gallinago gallinago	Snipe
Lullula arborea	Woodlark
Mareca penelope	Wigeon
Motacilla cinerea	Grey Wagtail
Pandion haliaetus	Osprey
Phalacrocorax carbo	Cormorant
Phoenicurus ochruros	Black Redstart
Streptopelia decaocto	Collared Dove
Strix aluco	Tawny Owl
Tringa totanus	Redshank
Fish	
Salmo trutta	Brown/ Sea Trout

Scientific Name	Common Name
Invertebrates	
Acronicta psi	Grey Dagger
Acronicta rumicis	Knot Grass
Agrochola lychnidis	Beaded Chestnut
Allophyes oxyacanthae	Green-brindled Crescent
Anchoscelis helvola	Flounced Chestnut
Andrena pilipes	Black Mining Bee
Apamea remissa	Dusky Brocade
Arctia caja	Garden Tiger
Asilus crabroniformis	Hornet Robberfly
Atethmia centrago	Centre-barred Sallow
Boloria euphrosyne	Pearl-bordered Fritillary
Boloria selene	Small Pearl-bordered Fritillary
Bombus rupestris	Hill Cuckoo Bee
Brachylomia viminalis	Minor Shoulder-knot
Caradrina morpheus	Mottled Rustic
Ceramica pisi	Broom Moth
Cirrhia gilvago	Dusky-lemon Sallow
Cirrhia icteritia	Sallow
Coenagrion mercuria	Southern damselfly
Coenonympha pamphilus	Small Heath
Cossus cossus	Goat Moth
Cupido minimus	Small Blue
Diarsia rubi	Small Square-spot
Ecliptopera silaceata	Small Phoenix
Ennomos erosaria	September Thorn
Ennomos fuscantaria	Dusky Thorn
Ennomos quercinaria	August Thorn
Epirrhoe galiata	Galium Carpet
Erynnis tages	Dingy Skipper
Eugnorisma glareosa	Autumnal Rustic
Euxoa tritici	White-line Dart
Formica rufa	Red Wood Ant
Hemistola chrysoprasaria	Small Emerald
Hepialus humuli	Ghost Moth
Hipparchia semele	Grayling
Hoplodrina blanda	Rustic
Hydraecia micacea	Rosy Rustic
Lasiommata megera	Wall
Leptidea sinapis	Wood White
Leucania comma	Shoulder-striped Wainscot
Limenitis camilla	White Admiral

Scientific Name	Common Name
Lipsothrix nervosa	Southern Yellow Splinter
Litoligia literosa	Rosy Minor
Lycia hirtaria	Brindled Beauty
Malacosoma neustria	Lackey
Melanchra persicariae	Dot Moth
Melanthia procellata	Pretty Chalk Carpet
Meloe proscarabaeus	Black Oil-beetle
Meloe violaceus	Violet Oil-beetle
Orthosia gracilis	Powdered Quaker
Plebejus argus	Silver-studded Blue
Polyommatus bellargus	Adonis Blue
Rhizedra lutosa	Large Wainscot
Satyrium w-album	White-letter Hairstreak
Scopula marginepunctata	Mullein Wave
Scotopteryx bipunctaria	Chalk Carpet
Scotopteryx chenopodiata	Shaded Broad-bar
Spilosoma lubricipeda	White Ermine
Spilosoma lutea	Buff Ermine
Stilbia anomala	Anomalous
Tholera cespitis	Hedge Rustic
Timandra comae	Blood-vein
Trichiura crataegi	Pale Eggar
Tyria jacobaeae	Cinnabar
Watsonalla binaria	Oak Hook-tip
Xanthorhoe ferrugata	Dark-barred Twin-spot Carpet
Xestia agathina	Heath Rustic
Xestia castanea	Neglected Rustic
Plants	
Briza media	Quaking-grass
Erica tetralix	North West Atlantic heath
Cardamine bulbifera	Coralroot Bittercress
Fragaria vesca	Wild Strawberry
Helleborus foetidus	Stinking Hellebore
Oxalis acetosella	Wood-sorrel
Potentilla erecta	Tormentil
Sanicula europaea	Sanicle
Spiranthes spiralis	Autumn Lady's-tresses
Tilia platyphyllos	Large-leaved Lime
Pinus sylvestris	Scots Pine
Mammals	
Lepus europaeus	Brown Hare
Micromys minutus	Harvest Mouse
Oryctolagus cuniculus	European Rabbit

Summary of Consultations with South West Water

APPENDIX D

Consultation 1: Initial data request – October 2022 – March 2023
An initial data request was submitted in October 2022 to South West Water (SWW) under the Environmental Information Regulation (EIR) (2004). Water companies in the UK are subject to the EIR, which grants the public the right to access environmental information held by the company. Water companies have a legal obligation to disclose the information unless specific exceptions apply. Requests must be answered within 20 working days, which can be extended to 40 days for complex requests. This data request included Q80 and Q90 flow data from wastewater treatment works across the East Devon District. Following a period of consultation with South West Water and East Devon District Council between November and December 2022, flow data was received for the River Axe catchment only. The request for Q80 and Q90 flow data for the entire catchment was fulfilled in February 2023, with population equivalent data and GIS data provided in March 2023.

Consultation 2: Follow up data request – November 2023
A follow up data request was submitted and fulfilled in November 2023 for permitted discharge limits.

Consultation 3: Comments on draft WCS report – August 2024
The draft WCS report was finalised and issues for key stakeholder consultation in May 2024. A meeting was held with SWW on the 12th August 2024 with key staff from SWW, Haskoning and EDDC. SWW raised the following comments on the WCS report:

- **Water resources** - SWW identified that further information is required in the WCS report on two supply schemes - increasing the transfer capacity via Whitecross by 2030 and Cheddar reservoir.
- **Headroom Assessment** - SWW identified that the data and/or assumptions used in the headroom assessment do not align with SWW's understanding. The SWW staff members involved in this consultation were not part of the EIR team that provided the data for the WCS. SWW commented that they would need to work through the appraisals in the WCS and reconsult.
- **SAGIS SIMCAT modelling** - The discussions identified that a SAGIS SIMCAT model was undertaken for the catchment in collaboration with the EA and has informed the WINEP programme. The findings of the modelling and the agreed programmes of works is something that was not previously provided to inform the WCS. The findings of this WCS were to be provided and provide context to the outputs of the RQP modelling.

A follow up meeting with SWW was proposed to discuss the details of how the data from the WCS differed from SWW's understanding. However, the consultation process was passed to the River Basin Management team in SWW prior to a meeting taking place.

Consultation 4: Additional data following consultation
SWW provided additional data in April 2025 in response to their initial comments on the WCS report. SWW shared the following data:

- **Flow Data for Headroom Assessment**: SWW has shared population estimates, average flows at the treatment works, and DWF permits. The flow data used Q90 data whereas the WCS uses Q80 data as per Environment Agency guidelines[22]. SWW have also used assumptions and historical data to project population changes, whereas the WCS used dwelling numbers specific to the Local Plan.
- **BOD Capacity/Data:** SWW has shared numbers from their BRAVA modelling, which is a risk assessment exercise (undertaken by the water companies themselves) with no single standard method across the water industry. The results of each process can therefore vary depending upon the underlying assumptions used. The information SWW provided considers the capacity of the treatment works for BOD impacts. The information provided does not allow for direct comparison with the results of the RQP modelling in the WCS. RQP modelling, used by the Environment Agency for

environmental permitting, is more specific to water quality impacts from discharges and is used extensively to inform the wastewater element of a WCS.

- **SAGIS Data:** SWW has carried out SAGIS modelling, which provides a broader view of water quality across catchments and allows for assessment of multiple treatment works in close vicinity on the same watercourse. SWW has neither shared the inputs of their model nor any clear outputs, which does not allow for comparison with the RQP modelling. RQP focuses on the impact of specific discharges, while SAGIS provides a broader, integrated view of water quality across entire catchments. RQP is used for detailed discharge assessments, whereas SAGIS supports strategic catchment planning and regulatory compliance.

The data provided by SWW did not provide clarity on the comments initially raised. As such, the additional data provided by SWW following consultation on the WCS report was not incorporated into a revised version of the WCS.

Statement of Community Involvement



Autumn 2025

East Devon – an outstanding place

East Devon District Council Statement of Community Involvement

This Statement of Community Involvement (SCI) sets out the policy for consulting the community, and anyone else interested in planning, on planning policy documents and planning applications in East Devon.

The SCI covers the following documents and proposals:

- **Planning Policy documents (including the Local Plan and other Development Plan Documents (DPD's), Supplementary Planning Documents (SPD's) and other guidance)**
- **Neighbourhood Plans**
- **Planning Applications**

The majority of the SCI deals with the plan making process (covering policy documents such as the Local Plan and guidance associated with it). It also sets out the minimum consultation we will undertake on planning applications, pre-submission requirements for 'major' developments and the support we will offer to local communities undertaking Neighbourhood Plans.

Contact details

Planning Policy
East Devon District Council
Blackdown House, Border Road, Heathpark Industrial Estate, HONITON, EX14 1EJ

Phone: 01404 515616
Email: planningpolicy@eastdevon.gov.uk

www.eastdevon.gov.uk/planning/planning-policy/
@eastdevon

To request this information in an alternative format or language please phone 01404 515616 or
email csc@eastdevon.gov.uk

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1. Introduction

1.1 East Devon District Council recognises the importance of community engagement and is committed to involving people in the planning process. Community consultation is not just about inviting people to comment on planning applications; it is important in making sure that the whole community is given the chance to influence the wider development framework within which those individual decisions are made.

1.2 You can play an important and active role in the planning system by having a say in planning decisions affecting your local community. The main ways you can get involved are:

• Having your say during public consultation on draft plans and other planning policy documents

• Commenting on planning applications (including other types of consents)

1.3 Section 18 of the Planning and Compulsory Purchase Act 2004 requires the Council to have an up to date Statement of Community Involvement (SCI) setting out how it will involve the community in plan-making and when considering planning applications. In this document we set out who will be consulted, how we will consult and when it will take place.

1.4 The SCI is divided into three sections and sets out:

• Your opportunities for involvement in the preparation of plans and **planning policy** documents

• The publicity and consultation that is carried out in relation to specific applications in what is known as the **development management** process

• The **neighbourhood planning** process and opportunities for involvement in the preparation of neighbourhood plans, neighbourhood development orders and community right to build orders

1.5 The SCI sets out the publicity and consultation procedures that we will use, explains the statutory requirements that we must meet at each stage and what other methods may be undertaken in addition to these minimum requirements. We must comply with the adopted SCI in preparing relevant planning policy documents and in determining planning applications.

1.6 We are required to review and update the Statement of Community Involvement regularly, and at least every 5 years. This revision to the SCI incorporates a number of factual updates arising from national changes to planning policies and procedures and revised contact details to bring the SCI up to date.

1.7 During the Covid-19 pandemic the Council introduced various new ways to become involved in planning matters through digital and online channels. This proved very effective and the SCI now reflects how the public and other stakeholders access information relating to the planning process. This includes an increased use and availability of electronic communications and increased use of social media to access information and interact with the Council. We have recognised the importance of ensuring that consultation is cost effective and that the Council is working effectively to free up limited resources, positively making best use of resources whilst helping to facilitate more convenient and effective engagement with the planning system and encouraging wider public participation.

1.8 Whilst it is likely that digital forms of publicity and consultation will continue to grow, we recognise that not all our communities will be able to readily access information digitally. In reviewing our SCI, we have sought to ensure there is equal opportunity for all to participate in the planning process and that information continues to be available in physical locations and in paper format. Upon request we will endeavour to accommodate reasonable adjustments for those with disabilities or other special requirements.

The National Policy Context

1.9 This SCI has been produced in accordance with the National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance (PPG). These highlight the government's commitment to engaging the public in planning, both in plan making and decision taking. The NPPF states that plans should "be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees". In relation to decision-taking, it states that "early engagement has significant potential to improve the efficiency and effectiveness of the planning application system".

Responsibility for making decisions

<u>Officers</u>

1.10 Council officers are responsible for conducting research, drafting planning policies, and evaluating planning applications. In certain instances, they may

prepare public reports or exercise delegated authority to make decisions. Significant decisions are typically made by Council committees, and occasionally by the Full Council. At these meetings, officers present recommendations, but the final decisions rest with the elected members of the Committee or Council.

1.11 Council officers offer expert advice on the technical aspects of planning, drawing on their professional experience. They are the primary point of contact for enquiries related to planning matters and provide support to both members of the public and elected Councillors. Their assistance covers all areas of the planning process, including planning applications and the development of planning policy.

Councillors

1.12 Councillors—also referred to as members—are the locally elected representatives for each area within the district and represent residents in matters covered by the District Council. The district is divided into wards, with each ward represented by one or more Councillors. Councillors participate in Council meetings, and many also serve on committees such as the Planning Committee and Strategic Planning Committee. Within these committees, members consider public statements, review and debate reports prepared by officers, ask questions, and ultimately vote on the recommendations presented.

1.13 Councillors serve as a vital link between the community and the Council, liaising with residents and raising concerns with Council officers. If not serving on the Planning Committee, your local Councillor can act as an advocate for residents or applicants in relation to planning applications. They can also offer guidance on the planning process and discuss local planning issues affecting the area. Councillors have the authority to request that applications be considered by committee, and there are formal provisions allowing them to address committee meetings. To contact your local Councillor, a full list of names and contact details is available on the relevant EDDC website page Who is my councillor? - East Devon.

Parish and Town Councils

1.14 Parish and Town Councillors are elected representatives covering parish matters at a very local level. There are Parish and Town Councils throughout the district, these are formally notified of planning applications and are also consulted on planning policy issues and may choose to produce Neighbourhood Plans. Most Parish and Town Councils have their own

planning committees where they discuss applications and agree on a response to submit to EDDC.

Your Local Member of Parliament

1.15 The role of your local Member of Parliament (MP) is to represent the people of their constituency in Parliament. MPs can act as an advocate on behalf of individuals or groups in a wide range of situations, however, MPs are entirely separate from local government and do not have a role within it or any special rights or privileges. Therefore, when planning concerns are raised with MPs, these are often passed directly to the Council for consideration.

2. Plan-Making

Publicity and consultation on plans and planning policy documents

3. Consultation we will undertake when producing a Planning Policy document

Stage in Plan making	Consultation Duration- (excluding Bank Holidays)	Consultation that we will undertake for each stage of Planning Policy document production
Local Development Scheme	No set duration	The Local Development Scheme (LDS) is the project plan for production of future planning policy documents. It sets out plans that will be prepared and the timetable for their production, consultation and adoption. https://eastdevon.gov.uk/planning/planning-policy/policy-work/what-policy-documents-will-we-produce-and-how-will-we-consult-on-them/local-development-scheme/ The LDS will be available in electronic form on the Council webpage.

EVIDENCE GATHERING AND PREPARING DRAFT DOCUMENTS	For the **Local Plan and other DPD's** this is the stage where we gather evidence and undertake engagement to determine what the plan should cover. Consultation is ongoing throughout this stage. The number and type of consultation documents we produce will depend on the issues involved and the revisions required. (Regulations 18 and 19 of Town and Country Planning (Local Planning) (England) Regulations 2012) For **SPD's**, this is the stage where a draft SPD is produced for consultation which	For the **Local Plan and other DPD's**, a minimum of 6 weeks for the consultation document stage For **other Policy Documents**, a minimum of 4 weeks	**EVIDENCE GATHERING** We will gather evidence through some or all of the following: • Review of existing data • Use of specialist consultants • Exhibitions and Roadshows (where we provide material and/or officer attendance) • Workshops (where we work with interested parties to explore issues) • Focus groups (where issues or policies are discussed and interested parties give us feedback) • Surgeries (where advice is given by professionals on their particular area of expertise) • Attending Meetings of Other Groups • One-to-One Meetings • Questionnaires • Consultation with Parish Councils and elected Members Any technical or background document that forms a (substantive) part of our evidence base will be available in electronic form on the Council webpage. We will endeavour to make these available as they are completed (although this may require authority from District Councillors). In relation to a local plan addressing Gypsy and Traveller issues the Council will have regard to the advice in Planning policy for traveller sites (2024) when preparing the evidence base. Details of the findings of consultation events will be available on our website and in paper format upon request. **CONSULTATION** We will notify those bodies, groups and individuals that we consider likely to have an interest in the subject of a Planning Policy document that we propose to prepare it, and invite representations about what it should contain and any proposals we have put forward. Any representations will be taken into account when preparing the document for consultation. Consultation will normally include: • publicising it on our website and in any EDDC newsletter; • notifying any party whose details we hold and who has expressed an interest in the subject.

	sets out the approach that the Council intends to take (Regulation 12 and 13 of Town and Country Planning (Local Planning) (England) Regulations 2012) **<u>Other guidance</u>** will also be produced in draft form for consultation As a minimum we must notify certain parties (as set out in the statutory regulations) that we are proposing a plan and invite them to comment on what it should contain. When we prepare the plan we must take these comments into account.		• issuing a press release; • notifying those 'consultation bodies' referred to in the Statement of Community Involvement; • presenting to the Agents Forum, if appropriate; • notifying any specific interest groups/organisations; • advising adjoining authorities, which could include County Councils, other District and Parish Councils; • notifying District Councillors and Parish Councils; and • making the document available at EDDC reception. Note- If, under extraordinary events such as the Covid pandemic restrictions of 2020 and 2021, the Exmouth and Honiton District Council offices are closed to the public, documents will not be available to inspect at the reception desks. Alternative arrangements to view paper copies will be arranged upon request. It may also include measures such as posters on local noticeboards, letters to residents, local events but this will depend on the resources available and the nature of the Policy document. The notification will give: • details about the Policy document; • details of where and when it may be inspected; • details of how to make representations; • details setting out that those making representations may request notification of our decision; and • the date by which representations should be received (being no less than 4/6 weeks) . Our usual practice is to provide a representation form for responses but to also accept written responses in other formats and emails. Where someone is unable to respond in writing an Officer can act as a scribe provided the respondent gives their permission and confirms the content is accurate. It will be made clear that all responses will usually be made public, subject to redaction of some personal information and any racist or inappropriate content. Representations will then be recorded electronically and made available on our website. It should be noted that: • Anyone may make representations about a document • All representations must be received by the date specified in the notification.

SUPPORTING DOCUMENTS	**Supporting Documents** Depending on the type of Policy document being produced, a variety of supporting documents may be required to inform it. Some documents are a legal requirement and these are described opposite. Consultation on SA report takes place alongside the Local Plan/DPD	**SA/SEA**- a minimum 5 weeks consultation with the 'consultation bodies' on a scoping report **HRA**- A minimum of 4 weeks for statutory consultees at stage a). A further 4 weeks for the public on the screening or full assessment **EIA**- A minimum of 4 weeks	**Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment**) - At key stages of Local Plan and other DPD production, a sustainability appraisal (SA) will be undertaken. This report will detail the likely significant environmental, social and economic effects of each proposal or option and will be undertaken and made available for public comment, usually alongside the Local Plan. If consultation leads to the approach changing significantly this will be reviewed and re-consulted on. The SA report will be considered by the Inspector as part of the Local Plan or DPD examination. Strategic Environmental Assessment is also a requirement for the Local Plan and other DPDs, but this is incorporated within the SA report. **Habitat Regulations Assessment (HRA) -** This assessment process requires the Council to screen the emerging policy document for potential impacts on the environment or internationally important habitats or species. The screening assessment may conclude that either: a) there will be no likely significant negative effects and a full assessment is not required, in which case the HR screening report should be referred to Natural England, Historic England and the Environment Agency for a period of at least 4 weeks (6 weeks is good practice). They may agree with the conclusion of the screening report or may recommend that a full assessment is required); Or b) there may or will be significant negative effects and a full assessment is required as part of the SPD work (in which case a full assessment must be carried out and the effects noted/addressed and/or mitigated). The screening and any subsequent full assessments will then be consulted upon in the same way as, and usually alongside, the Policy document. **Equalities Impact Assessment (EqIA) -** The Council is required to screen the emerging policy document for potential impacts on those with protected characteristics and to ensure they are not disadvantaged as a result of proposals. An EqIA will be made available for public comment, usually alongside the policy document. This will identify any potential impact on those with protected characteristics and outline how these will be mitigated. If an initial screening identifies a significant potential impact, a full Equalities Impact Assessment will be undertaken. If consultation leads to the approach changing significantly this will be reviewed and re-consulted on.

Stage in Plan making		Consultation Duration- (excluding Bank Holidays)	Consultation that we will undertake for each stage of Planning Policy document production
			Consultation statement - All Policy documents require a Consultation Statement that sets out who was consulted, how they were consulted and where documents and other material were available to access, including any measures taken to ensure inclusivity. It will summarise the main issues raised and explain how these were addressed. For the Local Plan and other DPD's this is called a representation statement

PUBLICATION	**Publication of the Document** For **Local Plans and other DPD's** this will be the document that we intend to submit to the Secretary of State) for consideration and subsequent adoption (Regulations 19 and 20 of Town and Country Planning (Local Planning) (England) Regulations 2012) Anyone may make representations on the 'proposed submission document' at this stage, but they must be received by the planning authority by the date specified in the 'Statement of Representation Procedure'	For the Local Plan and other DPD's, a minimum of 6 weeks For other Policy Documents, a minimum of 4 weeks. Although exceeding requirements, it is usual practice to consult on SPD's for 6 weeks	**For Local Plans and other DPD's** A minimum of six weeks formal public consultation will be undertaken in readiness for plan Examination. The following documents will be made available on the Council's web site and at the main Council Offices in East Devon • The relevant local plan or DPD • A submission policies map (if applicable) • The relevant sustainability report • A representation statement giving details of which bodies and persons were invited to make representations (under regulation 18) and how this was done, a summary of the main issues raised and how they have been addressed in the local plan. • Any relevant supporting documents. Details will also be provided of where and when the above documents are available for inspection and this will be sent to the bodies and persons invited to make representations. This is called a 'statement of representation procedure'. It will be made clear that all responses will usually be made public, subject to redaction of some personal information and any racist or inappropriate content. Representations will then be recorded electronically and made available on our website. Redacted information will be shown on copies that will be sent to the Planning Inspector and may be viewed at the council office. **For SPD's and other policy documents** A minimum of four weeks formal public consultation will be undertaken on the revised SPD/other Policy document and the consultation statement. The consultation will follow the same format set out for the previous stage. The following documents will be made available on the Council's web site and at the main Council Offices in East Devon • The relevant SPD or policy document • The consultation statement • Any relevant supporting documents.

Stage in Plan making		Consultation Duration- (excluding Bank Holidays)	Consultation that we will undertake for each stage of Planning Policy document production
	For **SPD's** this will be the document that we intend to adopt (Regulation 12 and 13 of Town and Country Planning (Local Planning) (England) Regulations 2012)		It will be made clear that all responses will usually be made public, subject to redaction of some personal information and any racist or inappropriate content. Representations will then be recorded electronically and made available on our website.

SUBMISSION page 610	**Submission of the Document** **<u>Local Plans and other DPD's</u>** This is the stage the Local Plan or other DPD is sent to an Appointed Person (an Independent Planning Inspector appointed by the Secretary of State) Before making recommendations on the plan, the Inspector must consider any representations made on the published plan There is no equivalent stage for SPDs and other policy documents as the decision is made by the Council rather		We will send the following documents to the Inspector in electronic or paper form: • The sustainability appraisal report; • A submission policies map, if the adoption of the local plan would result in changes to the adopted policies map; • A statement setting out: • Which bodies and persons were invited to make representation on the content of the plan (Preparation stage); • How those bodies were invited to make representations; • A summary of the main issues raised in those representations; • How any of those representations have been taken into account; • If representations were made at the publication stage, the number of representations made and a summary of the main issues raised; and • If no representations were received a statement that none were received; • Copies of any representations made at the publication stage; and • Any supporting documents the local planning authority consider relevant including the Equalities Statement and any assessment under the Habitats Regulations. We will make these documents available as soon as practicable, and notify anyone with an interest that the Local Plan/DPD has been submitted.

Stage in Plan making		Consultation Duration- (excluding Bank Holidays)	Consultation that we will undertake for each stage of Planning Policy document production
	than an independent Inspector		

Stage in Plan making		Consultation Duration- (excluding Bank Holidays)	Consultation that we will undertake for each stage of Planning Policy document production
EXAMINATION	**Examination Stage** **<u>Local Plans and other DPD's</u>** An inspector will be appointed by the Secretary of State to conduct the examination. The Inspector will determine whether the plan has complied with various legal requirements (including the 'duty to co-operate') and whether it is 'sound'. There is no equivalent stage for SPDs and other policy documents		We will publish (on our web site and at our main Council Offices) details of the date, time and place of the hearing and the name of the Inspector at least 6 weeks before the opening of the hearing. We will also send these details to anyone who maintains a representation on the plan.

Stage in Plan making		Consultation Duration- (excluding Bank Holidays)	Consultation that we will undertake for each stage of Planning Policy document production
RECOMMENDATIONS	**Publication of the recommendations of the appointed person** **<u>Local Plans and other DPD's</u>** We must publish the recommendations and reasons of the Inspector as soon as reasonably practical after receipt of their report. There is no equivalent stage for SPDs and other policy documents although a report will be considered by the Council setting out the reasons for recommending it for adoption		We will publish the Inspector's recommendations and reasons on our web site and at our principal offices. We will also advise those people who requested it that the recommendations are available.

Stage in Plan making		Consultation Duration- (excluding Bank Holidays)	Consultation that we will undertake for each stage of Planning Policy document production
ADOPTION	**Adoption** This is the stage where the document is formally adopted and given full weight in decision making		As soon as possible after the policy document is adopted (by resolution of the local planning authority) we will publish on our web site and make available at our main office: • The local plan, DPD, SPD or other policy document; • An adoption statement including the date on which it was adopted (this will also be sent to anyone who asked to be notified and, in the case of a Local Plan or DPD, we will also send a copy to the Secretary of State). In the case of an SPD, the adoption statement will also include, if applicable, any modifications made (pursuant to section 23(1) of the Act). • Any other supporting documents and, in the case of a Local Plan or other DPD, a copy of the sustainability appraisal document and adoption statement. • Details of when and where the plan can be inspected. We will usually issue a press release advising that the policy document has been adopted.
	Monitoring and Review		Monitoring and Review • We will notify interested parties of monitoring processes/the Monitoring Report and of document Review (if proposed)
	In addition for each stage we will: • Examine the potential for holding stakeholder events. We welcome your suggestions as to events which would be of particular worth or value. • Issue relevant and informative press releases and press articles. • Make information available in a variety of formats so that those with special requirements are able to participate in the consultation. This may include: *Large Print *Different font types/colours *Audio version (via our website) *Translation into other languages (via our website) *Face to face meetings with Officers		

4. Development Management

The Council, as local planning authority, is required to undertake a formal period of public consultation, prior to deciding a planning application. This is prescribed in article 15 of the Development Management Procedure Order. There are separate arrangements for listed buildings which are set out in regulation 5 and regulation 5A of the Listed Buildings and Conservation Area Regulations 1990 (as amended).

Development Management	**Planning Applications** In line with legislation, as a minimum planning applications will be advertised in one of the following ways: • through an advertisement in the local newspaper; • by posting a notice on the application site; or • by a letter to immediate neighbours. Additional consultation, using two or more of these methods and by writing to less immediate neighbours or other interested parties, may be carried out depending on the circumstances. This reflects current practice in development management. The time period for making comments will be set out in the publicity accompanying the planning application. Although most applications are subject to a 21 day consultation period, this can vary depending on the type of application and can range from 14 to 30 days. The consultation deadline for each specific application will be clearly stated in the letter, notice, advert and online. Information on statutory publicity requirements is available on the Government's website. The Council is mindful that in some instances consultation periods may not align with the timetable for Parish Council meetings where applications are being discussed and considered. In such instances, wherever possible, the case officer will be pragmatic in terms of agreeing extensions of time to allow sufficient time for comments to be made. Planning law prescribes circumstances where consultation must take place between a local planning authority and certain organisations (known as statutory consultees), prior to a decision being made on an application. The organisations in question are under a duty to respond to the local planning authority within a set deadline and must provide a substantive response to the application in question. Where appropriate, the statutory consultees can request additional information to be supplied by the applicant if it is necessary to help then reach a recommendation. The simplest and easiest way to comment is online via the Council's website. This route is also encouraged as it enables officers to process and publish comments easily. If responding online is not available or suitable, comments can also be made by email or post. Full details are provided on notification letters and site notices of the different ways comments can be made. All comments must be made in writing and should be submitted within the consultation period set out on the website or in the consultation letter, site notice, or advert. You may still comment after the consultation period has expired and until a decision is made, however, a decision can be made at any time after the expiry of the consultation period. To follow the progress of an application, search the online application database. Using the application reference number is the easiest way to find the application. **Pre-submission consultation**

	Pre-application consultation is the responsibility of the applicant but there are standards that the applicant is expected and encouraged to follow prior to making an application for planning permission. Pre-Application engagement with the Council Whilst we cannot require a developer to submit a pre-application proposal or engage with us before submitting a planning application, the take-up of our pre-application services is strongly encouraged. Pre-application advice is subject to payment of an appropriate fee based on the size and scale of the development. Details of fees for different development types are set out on the Council's website. Through the pre-application process you can get advice about the likely acceptability of the proposal, identify any problems you may need to solve, and verify the information required to be submitted in support of any subsequent application. This can provide greater certainty, raise the quality of the development, and speed up the application process. Pre-application engagement directly with the community and other stakeholders The Council's pre-application advice service is provided directly to the person making the inquiry and is not subject to public consultation. Prior to submitting an application applicant's are therefore also strongly encouraged to undertake appropriate and effective pre-application consultation with the local community and relevant statutory and non-statutory consultees. A number of statutory and non-statutory consultees offer their own pre-application advice services for applicants. Local engagement should include relevant Parish and Town Councils. Local community engagement is particularly expected by applicants that are promoting rural exception sites to meet a specific community need, on major sites (defined in the Local Plan as 10 or more dwellings) or, for other uses, 1000 square metres or 1 ha or more. The applicant is encouraged to seek the views through early engagement to take into account local knowledge, understand key issues, and make appropriate amendments to address comments or concerns of the local community. Engagement should be early enough in the design process to be meaningful and ensure feedback can genuinely influence the layout and design proposals. Consultation methods should be proportionate and tailored to the specific community, and could for example include: • In person exhibitions and consultation events • Dedicated websites and online surveys • Leafleting to specific residents and business • Publicity through social media and local newsletters • Presenting at Parish Meetings It is good practice for applicants to provide follow-up feedback to communities after local engagement has been undertaken, to explain how comments received have been taken into account.

5. Neighbourhood Plans and Neighbourhood Development Orders

A Neighbourhood Development Plan is a planning document, produced by the local community, which sets out policies for the type and location of development in the local area (usually a Parish, in East Devon). Neighbourhood Planning was introduced by the Localism Act 2011. Legislation[1] sets out the regulatory requirements for making a Neighbourhood Plan. It can also allocate sites for development, and, once made, becomes part of the 'Development Plan' for the area. Local communities will be able to say, for example, where new homes and offices should be built, and what they should look like. The neighbourhood plan will set a vision for the future and can be very detailed, or generalised, depending on what local people want.

A Neighbourhood Development Order enables the community to grant planning permission for new buildings they want to see go ahead on a particular site or within a particular area. Neighbourhood development orders allow new development without the developers having to apply for separate planning permission so all supporting technical evidence must be provided early in the process in order to ensure the order is based on the same information usually required to determine a planning application.

The neighbourhood plan or order must meet a set of Basic Conditions to ensure it complies with local and national planning policy, to ensure it meets the principles of sustainable development and to ensure that the local community have had a genuine opportunity to be engaged with the process.

Neighbourhood plans and orders are subject to an independent examination to check that it meets the Basic Conditions. If the standards aren't met, the examiner will recommend changes. The District Council, as planning authority will then need to consider the examiner's views and decide whether to make those changes. If the examiner recommends significant changes, then the parish, town council or neighbourhood forum may decide to consult the local community again before proceeding.

Once the plan or order has met the basic conditions, the District Council will arrange a referendum to ensure that the local community has the final say on whether a neighbourhood plan or order comes into force. People living in the neighbourhood who are registered to vote in local elections will be entitled to vote in the referendum. If more than 50% of people voting in the referendum support the plan or order, then the local planning authority must bring it into force.

[1] The Neighbourhood Planning (General) Regulations 2012

Once a neighbourhood plan is in force following a successful referendum, it carries real legal weight. Decision makers are obliged to consider proposals for development in the neighbourhood against the neighbourhood plan. A neighbourhood order grants planning permission for development that complies with the order. Where people have made clear that they want development of a particular type, it will be easier for that development to go ahead.

Council support	**Neighbourhood Plans and Neighbourhood Development Orders** In line with legislation, East Devon District Council will offer advice and assistance in the making of Neighbourhood Plans and Neighbourhood Development Orders. The details of this commitment are set out in the Neighbourhood Planning Protocol http://eastdevon.gov.uk/media/1904166/planning-protocol.pdf *Please note that an updated version is being produced.* To assist those involved in Neighbourhood Planning or the production of a Neighbourhood Development Order the Policy Team of the Council will: a) Maintain an up to date Neighbourhood Planning webpage on the Council's website that summarises the powers available under the Neighbourhood Planning regime and the key stages to developing a Neighbourhood Plan; b) Provide contact details of key officers in the Council that will be dealing with Neighbourhood Planning (including making of Neighbourhood Development Orders); c) Make available information on local and wider case studies as they emerge; d) Provide information relating to funding and resources; e) Offer explanation and advice to help a Community understand Neighbourhood Planning (including Neighbourhood Development Orders) and whether it is the right approach for them; f) Be available to attend inaugural meetings of groups wishing to apply for designation as a Neighbourhood Forum and / or Neighbourhood Areas and who wish to produce Neighbourhood Plans or produce Neighbourhood Development Orders; g) Hold an annual meeting open to all Parish Councils and other bodies and organisations to discuss and invite presentations on general Neighbourhood Plan matters; h) Provide general advice about the need for the Neighbourhood Plan or Neighbourhood Development Order to be in conformity with the Development Plan The Planning Policy Team (details on page 2 of this document) will be the primary point of contact for Neighbourhood Planning work. The inputs of the Policy

	Team will include preparing formal reports and undertaking formal assessment process in respect to Neighbourhood Plans and Neighbourhood Development Orders as well as providing informal advice. **It is stressed that any advice, comment or assistance provided by the Policy Team (or any other officers of the Council) will be the opinion of any particular officer at that point in time. Opinion expressed is in no way binding on the Council (be that any subsequent consideration by that officer or any other officer or formal recommendations to or decisions taken by the Council).** Generally officers will not offer advice or comment on what the policies or proposals in a Neighbourhood Plan should say, or for example what areas of land should be allocated for development. But officers will offer comment, guidance and advice on the types of issues that could be appropriate to take into account in terms of a group thinking about Neighbourhood Plan or Neighbourhood Development Order format, structure or more detailed content.		
Stage in Plan making that the District Council will undertake consultation		**Consultation Duration**	**Consultation that we will undertake**
Stages when consultation will be undertaken	**Neighbourhood Area Designation Consultation**	**Minimum of 6 weeks**	Most of the consultation on a Neighbourhood Plan or Neighbourhood Development Order is carried out by the community themselves. Through a Statement of Community Involvement (known as a Consultation Statement for neighbourhood plans and orders) they will need to demonstrate that anyone who lives or works in a Neighbourhood Area has had the opportunity to express their views and that these have been taken into account. An independent Examiner will determine this. We will consult at the stages on the left, through:
	Neighbourhood Forum Designation	**Minimum of 6 weeks**	

	Submission Consultation and Publicity of a Plan proposal	**Minimum of 6 weeks**	• Written/email consultations with statutory consultees, general consultees and other relevant stakeholders, individuals and organisations who have expressed a wish to be consulted or have previously made comments and • By making the Consultation document available on the Council's website and hard copies available at the Council offices, from the Parish Council and the local library, if there is one within the Parish- Note- this is subject to any access restrictions, for example public buildings being closed due to Covid; • Through press notices, notices on noticeboards and a notice on the Council's website
	Referendum	**1 day**	Everyone who lives in the neighbourhood area and is entitled to vote will be invited to vote on the neighbourhood plan or neighbourhood development order. Ballot papers will be sent to the voters registered address and the ballot will be advertised on the Council's webpage, at the polling station and on noticeboards in the Parish. A press release will usually be issued.

Consultation Bodies

The Town and Country Planning (Local Development) (England) Regulations 2012 require the Council to consult the following 'specific' and 'general' consultation bodies if proposals in planning policy documents affect them. A number of these bodies are also considered to be Duty to Co-operate bodies. It is important to note that the Neighbourhood Planning (General) Regulations 2012 (schedule 1) also requires qualifying bodies to consult the same consultation bodies in the preparation of Neighbourhood Development Plans. In instances where any of the organisations (bodies) detailed below cease to exist, successor bodies will be consulted.

Specific Consultation Bodies

Local Planning Authorities	The Coal Authority
• Devon County Council	Homes England

• West Dorset District Council	Natural England
• Taunton Council	The Environment Agency
• Mid Devon District Council	Historic England
• Exeter City Council	Network Rail
• Teignbridge District Council	National Highways
Town / Parish Councils	Marine Management Organisation
All Town and Parish Councils within and adjoining East Devon District	Relevant telecommunications companies
	Devon and Cornwall Constabulary/ Police and Crime Commissioner
Civil Aviation Authority	Relevant health bodies e.g. CCG, NHS PCT
Relevant sewerage and water undertakers	Relevant electricity and gas companies

In addition to the specific consultation bodies listed above, the council/qualifying body will involve as many people and groups as possible in the categories below:

General Consultation Bodies
• voluntary bodies some or all of whose activities benefit any part of the local planning authority's area
• bodies which represent the interests of different racial, ethnic or national groups in the local planning authority's area
• bodies which represent the interests of different religious groups in the local planning authority's area
• bodies which represent the interests of different gender and sexual orientation groups in the local planning authority's area
• bodies which represent the interests of disabled persons in the local planning authority's area
• bodies which represent the interests of persons carrying on business in the local planning authority's area

Examples of organisations which are General Consultation Bodies
Environment and conservation groups (e.g. the Royal Society for the Protection of Birds and Devon Wildlife Trust)
National Landscape (previously Area of Outstanding Natural Beauty (AONB)) Partnerships
Minority ethnic groups
Gypsy and Traveller groups
Sport England
Youth groups, schools, colleges
Health care groups

Transport providers/operators
Housing interest groups
Landowners and developers
Local businesses/ bodies which represent local businesses
Local resident associations
Older persons groups
Religious groups

Report to: Strategic Planning Committee

Date of Meeting: 25 November 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

Heritage Strategy 2024-2042

Report summary:

To agree an updated Heritage Strategy for public consultation to run from 2024-2042. This will replace the existing strategy (2018 – 2031). The strategy brings together information on the heritage of East Devon and identifies the issues, challenges and opportunities for the future with a plan of recommended actions. It informs and supports the heritage policies of the new Local Plan.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

That Strategic Planning Committee agree the draft Heritage Strategy for public consultation to align with the second Reg 19 Local Plan consultation.

Reason for recommendation:

The NPPF (para.203) states that "Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats." The Local Plan outlines its policies for the district's heritage, whilst the Heritage Strategy sets out more detailed aims, objectives and a plan of recommended actions. As the original Strategy has been subject to a 'light touch' update, an extensive public consultation is not considered to be necessary, however we are keen to receive feedback on our proposals and ensure our approach is undertaken in an open and transparent way and informs and is beneficial to the policies of the second Reg 19 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):

☐ Assets and Economy

☐ Communications and Democracy

☒ Council, Corporate and External Engagement

☒ Culture, Leisure, Sport and Tourism

☐ Environment - Nature and Climate

☐ Environment - Operational
☐ Finance
☒ Place, Infrastructure and Strategic Planning
☐ Sustainable Homes and Communities

Equalities impact Low Impact

Climate change Low Impact

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

Links to background information

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

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

Report in full

1. Introduction

1.1 This report introduces a light touch review of the heritage strategy for East Devon and recommends that public consultation is undertaken to run alongside the second Regulation 19 Local Plan consultation. To comply with the Statement of Community Involvement SCI January 2021 consultation should last for a minimum 4 weeks. On conclusion of the consultation a feedback report on comments made will be presented to this committee with recommendation for amendment to the strategy, where appropriate.

1.2 The strategy, in full, that is recommended for consultation is appended to this committee report.

2. What is Heritage and why is a strategy necessary?

2.1 The term heritage embraces history in all its forms, from buildings, spaces, art and artefacts to natural heritage such as landscape, flora and fauna and cultural heritage including place names, customs and traditions.

The Historic Environment is described in the NPPF (2024) as “all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora”

A Heritage Asset is described in the NPPF (2024) as "a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)."

2.2 The National Planning Policy Framework (National Planning Policy Framework p.203) states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment. This was reiterated in the comments received from Historic England in response to consultations on the Issues and Options and Draft versions of the emerging Local Plan. East Devon has a rich historic environment and an abundance of heritage assets that provide very significant environmental, social and economic benefits for the district. As an irreplaceable resource the strategy will help to ensure that they are protected, maintained and enhanced to the advantage of future generations.

2.3 The existing Heritage Strategy covers the period 2013-2031 and, as more than 5 years have passed since its adoption and many of the short term actions have been achieved, it is considered an appropriate time to refresh and update it so that it can support the policies in the new Local Plan.

2.4 The new strategy follows the same format as the original and presents a summary of the historic environment of the district, its significance and its benefits. It also identifies the heritage issues in East Devon and develops objectives for the future with an action plan for the delivery of our recommendations. In more detail:

Section 1:

Following an introduction, this sets out the purpose of the strategy, provides information on the role of the Council and other organisations, sources of information and a background of legislation and policy. It also discusses the implementation of the actions in the original strategy and highlights the very significant progress made on these.

Section 2:

The overall strategy for the future of our heritage is met through a range of aims and objectives. These are addressed in the three themes of:

A: Understanding and appreciating our historic environment

This section provides an overview of the historic environment, detailing significant designated heritage assets such as Conservation Areas, Listed Buildings, Parks and Gardens, Scheduled Monuments, and the World Heritage Site coastline and landscape. It also briefly covers undesignated assets, including archaeological findings.

B: Positively managing our historic environment

This theme sets out our current policies and programmes relating to development management, Conservation Areas and heritage assets at risk. It identifies issues and looks at the future programme of managing these designated assets and the potential for a local list of undesignated assets, whilst providing further guidance on local distinctiveness. A significant new section relates to carbon reduction and climate change

mitigation and how this can be achieved, particularly in listed buildings, without damaging their intrinsic character.

C: Enhancing and benefitting from our heritage

This theme looks at the value of our heritage as a part of sustainable development, and the social, economic and environmental benefits it provides for East Devon. It identifies how we can work better with partners and communities to enhance our heritage and make the most of these benefits, particularly in terms of working with Neighbourhood Planning groups and informing their policy production. It also considers the wider policy context.

Section 3:

Implementation of the strategy is considered including resources, benefits and monitoring. The objectives raised from each theme are developed into a plan of recommended actions, detailed initially for the next three years. Many of these actions follow on from the original strategy, and are maintenance tasks or updating of information.

Section 4:

Appendices include a summary description of the Conservation Areas of East Devon, information and maps for each of our historic town centres, details of partners and local history organisations. This has been updated to reflect the new Local Plan policies and latest guidance.

3. Resource Implications

3.1 The actions recommended in the strategy have been carefully considered in the light of resource implications. They are either a priority as they are needed to fulfil a statutory duty, or are expected to produce significant beneficial outcomes whilst minimising resources in the long term.

3.2 A significant number of short-term priorities identified in the original strategy have been wholly or partially achieved and many of the actions in this, updated, strategy involve further or ongoing work building on these achievements whilst minimising the resources required. An example is the establishment of a heritage section on the Council's website as an action in the original strategy, which will continue to be monitored and updated in this one.

3.3 The strategy continues to utilise the enthusiasm and expertise of East Devon communities, many of whom have taken on ownership and accountability of their local area through neighbourhood plans, with volunteers driving the process forward. Along with specialist historic groups, volunteers will continue to be encouraged to identify non-designated heritage assets locally. Specific support will be provided to Neighbourhood Planning groups who wish to protect heritage assets through designation and/or producing policies and continues to encourage resourceful ways for communities to help manage assets in their local areas. A number of pilot schemes were implemented

following the original strategy and these have informed the actions in the current strategy.

3.4 The original strategy required a considerable investment of staff time facilitating and advising on training, but this has built capacity within local communities to help manage their own assets and further training is likely to be delivered via support for Neighbourhood Planning. It also required provision of a more comprehensive website to provide a base for the exchange of information and links to other organisations, guides and training in heritage issues. The new strategy proposes that the improved webpages be maintained and added, recognising that the majority of Officer input has already been undertaken.

3.5 It should be noted that the devolution proposals are likely to have an impact on the availability of staff and other resources to implement the action plan. Details are not yet known, but this could offer the opportunity to work collaboratively with staff from other Devon authorities and could increase the scope of future projects. Recognising the uncertainties, and the potential need to review the strategy within a few years to ensure a consistent approach across authorities, the majority of short term actions focus on existing processes and projects rather than committing to major new initiatives.

4. Historic England feedback

4.1 Historic England were informally asked to comment on a draft version of the strategy and fed back very positively and usefully:

> *Overall, the Strategy appears to be sound and comprehensive, and builds on the success of the previous iteration, where many of the original actions have already delivered a solid foundation for the new strategy to build on. The three themes continue to be a helpful way to frame the Strategy and facilitate the discharge of the authority's various policy obligations:*
>
> ***Theme A - Understanding and Appreciating Our Historic Environment***
> *It seems that the first theme has been thoroughly explored, and the understanding and dissemination of the local heritage appears to be the main thrust of the authority's ongoing work.*
>
> *We are pleased to see that the innovative approach of engaging the community, to help co-deliver the authority's heritage programme of work, is continued from the previous strategy. It is also good to hear that a cohort of community volunteers have been trained to undertake appraisals and other forms of assessments, including the review of the remaining conservation areas, by capitalising on neighbourhood plan communities.*
>
> ***Theme B - Positively Managing Our Historic Environment***
> *The new strategy recognises the limited available resources. This clearly necessitates the prioritisation of core, regulatory tasks over more proactive management of the local heritage.*
>
> *Given this challenge, the local authority's innovative strategy to mobilise community volunteers, to help with the management of the historic environment, is a bold and potentially effective way to respond to the current financial strictures. Furthermore, such an approach has intrinsic benefits that align well with Historic England's core values of: Active*

Participation and Connecting Communities. We fully support East Devon's agenda that maximises community engagement and promotes the community's ownership of their heritage.

It is encouraging to see that clearly defined actions have been identified, and a monitoring regime is also in place to ensure that the strategy is indeed delivered. However, it might help to further refine "what success might look like" for each identified action, whether this is explicitly expressed in the strategy document itself, or as part of a complimentary project plan that guides the delivery of the Strategy.

It might help to have a more concrete series of actions that support each of the more broadly aspirational actions. For example:

Proposed Action: "Update and publish shopfront guides and any other relevant guides relating to heritage".

In this case, it might help to undertake an audit of existing local heritage guidance. Are there any gaps in the existing suite of guidance? Do some guides require updating? Could carefully targeted, new, local guidance help ward-off any imminent threats, or embrace emerging opportunities? ... or, perhaps some targeted new guidance might even streamline the authority's heritage management process and free-up resource for other tasks? Once this wish-list is identified, it could become a series of goals that would go towards delivering the headline, more-aspirational Action that is published in the Strategy.

It is good to see that Historic England's Heritage at Risk initiative has been highlighted, and that the authority recognises that any Conservation Areas potentially at Risk ought to be flagged and added to the register. We would be willing to discuss the Risk Register and happy to visit to review any potential candidates.

It would help to formulate a strategy and project plan that prioritises the council's review of its Conservation Areas. This might bring forward the review of Conservation Areas:
where a Neighbourhood Plan is being proposed.
or where a timely review of the Conservation Area might help evidence housing allocations through the Local Plan process.
or where regeneration or other initiatives/investments might be planned;
or generally significant interventions are anticipated (eg major planning applications, transport infrastructure proposals etc).

Theme C - Enhancing And Benefiting From Our Heritage
Understandably, this is potentially the most resource-heavy and challenging theme. The proposed range of strategies and actions all make perfect sense. However, as yet these strategies and actions seem like broadly aspirational themes, rather than fully thought-through, actionable programmes of work.

Inevitably, regeneration opportunities come forward in unforeseen ways, often emerging through the work of other departments, such as Economic Regeneration. However, it may be possible to be more proactive with this programme of work.

It could be wise to learn from other Local Authorities who are successfully delivering heritage-led regeneration elsewhere in the South-west. For example, Weston super Mare has been very successful at attracting government and lottery funding, by presenting a clear and attractive vision for the future of the place. Producing a vision; employing a destination / branding consultant; or commissioning Place Plans or Masterplans can repay

the investment many times over. Perhaps there is an opportunity to include some of this thinking about Heritage-led Regeneration in the new Strategy?

However, without commissioning any new initiatives, simply linking ongoing Conservation Area work to social or economic objectives/activities is likely to attract opportunistic funding, especially from non-heritage or mainstream sources. Historic England's own grant funding criteria now require particular benefits, such as civic and community related outcomes to ensure eligibility. So, taking a community-led approach is particularly timely.

4.2 Historic England's comments have been taken into account in finalising the draft strategy for consultation. This is a high level, strategic document and some of their suggestions will be of most relevance when preparing more detailed documents leading on from the actions in the strategy, such as masterplans and new guidance.

4.3 Historic England's willingness to engage in this work, and in the wider local plan site assessment work, is welcomed and will be very useful in implementing the strategy actions.

5. Recommendations

5.1 The new Local Plan contains a number of heritage policies and proposed allocations with heritage implications. To comply with the NPPF and address the matters raised by Historic England and other representors during consultation on the Draft and Reg 19 Plans, it is proposed that the existing Heritage Strategy be updated to cover the remainder of the new Plan period. The Strategy will form the basis of the evidence to support the heritage policies in the Local Plan and, through the action plan, demonstrate the Councils commitment to protecting and enhancing the historic environment.

5.2 It is recommended that the Heritage Strategy (2024-2042) is approved for the purpose of a public consultation, running alongside the second Regulation 19 Local Plan consultation. This will be hosted on the Council's website and advertised in conformity with the SCI. Following the consultation, it is recommended that, informed by feedback, the Strategy is updated and used to support the policies of the Local Plan.

Financial implications:

There are no direct financial implications identified within the report. (AB/11/11/2025)

Legal implications:

The legal implications are covered in this report (002533/14 November 2025/DH)

Heritage Strategy 2024 – 2042



East Devon – an outstanding place

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Broadhembury from the bridge.

Executive Summary

The second heritage strategy for East Devon presents a summary of our heritage, its significance and its benefits whilst developing objectives for the future, with an action plan for the delivery of our recommendations. The strategy runs for 18 years from 2024 – 2042 to co-ordinate with the local plan timescale. It provides a very light touch review of the original strategy, building on the success of that document and delivering any outstanding actions.

The strategy focuses on the heritage assets of the district where the Council has a direct role and responsibility, or influence, in the decision making or management process. However broader designations that inform the strategy are also considered, such as the National Landscapes (formerly known as Areas of Outstanding Natural Beauty), which have a positive influence on the enhancement and management of the district's heritage.

Section 1 introduces and sets out the aims of the strategy, with information on the role of the Council and other organisations, sources of information and a background of legislation and policy.

The strategy for the future of our heritage is met through a range of aims and objectives which are explored in Section 2 through three themes. For each theme, objectives for the future are raised and actions to meet those objectives are recommended:

- Theme A describes our historic environment and provides information on its designated and undesignated heritage assets and their significance.

- Theme B sets out current policies and programmes relating to development management, conservation areas and heritage assets at risk, including our statutory duties.

- Theme C looks at the value of our heritage as a part of sustainable development, and the social, economic and environmental benefits it provides for East Devon. The impact and influence of other policies are considered as well as how we work with our communities and partners.

The actions raised in Section 2 are presented together in Section 3 with details of their implementation. This section also provides more information on resources, benefits and monitoring.

A brief description of our historic town centres and Conservation Areas are outlined in Appendices 1 and 2, with details of partners, local history organisations and local museums in Appendix 3.

The Heritage Strategy document is intended to meet a range of needs and interests and does not need to be read in its entirety. For this purpose summaries of the three themes are provided at the end of each theme. The action plan also provides a useful summary of the strategy for the next 16 years. Themes and actions are colour coded to help navigation of the document.

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Section 1: Introduction and Background



World Heritage Site coastline at Orcombe Point, Exmouth

Introduction

1.1. Welcome to the second heritage strategy for the district of East Devon, a place with a rich historic environment and an abundance of heritage assets, valued by its residents and visitors alike. It is a strategy that brings together information on our heritage and identifies challenges and opportunities for the future. The strategy seeks to involve the community and develop partnerships to make the most of the benefits that heritage can bring. This is an opportunity to celebrate together the outstanding heritage East Devon has to offer.

What is heritage?

1.2. The term heritage embraces history in all its forms, from buildings, spaces, art, artefacts and archaeological sites to natural heritage such as landscape, flora and fauna and cultural heritage including place names, customs and traditions. The strategy will touch on many of these aspects but will focus on the role of the Council and how we can better work with partners and communities in the future, especially in respect of our built heritage.

The heritage of East Devon

1.3. The character of East Devon has evolved as a unique combination of historical influences. It is a predominantly rural area, with attractive market towns, picturesque villages and part of a World Heritage Site coastline to the south, with fine seaside resorts. We are fortunate in the district to have nearly 4500 individual assets of significant architectural and historic importance that have been listed nationally, including buildings, monuments and parks and gardens. In addition to these we have a wealth of assets of more local interest which also add richness to the landscape.

1.4. East Devon's exceptional natural landscape is reflected in the designation of two National Landscapes which cover around two thirds of the district. The diversity of the district's landscape and its underlying geology can be seen from the Exe estuary in the west through to the World Heritage Site 'Jurassic Coast' in the south, the Blackdown Hills to the north and the Dorset and Somerset borders in the east.

1.5. There is also a noticeable change in the character of our settlements, from the Victorian and Edwardian seaside resorts of the south coast to the Saxon and Roman influenced market towns of the central area and medieval farmstead groupings scattered throughout the district.

1.6. Historic buildings of considerable architectural merit are apparent in our towns and villages, telling a story of our social, agrarian and industrial legacy, whilst distinctive local building materials such as chert, cob and thatch retain a rural feel. The district is also notable for its archaeology, with a range of scheduled monuments including the remains of Iron Age hill forts and Roman forts, medieval castles and a wide scattering of Bronze Age burial sites.

Why have a heritage strategy for East Devon?

1.7. The National Planning Policy Framework[1] states that "plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk though neglect, decay or other threats. Our heritage assets, which are valued parts of the historic environment, are an irreplaceable resource that provide significant environmental, social and economic benefits for East Devon.

1.8. Positive conservation helps to preserve the assets themselves, but can also contribute to the local economy, both directly, through the employment of specialised craftsmen and use of local materials, and indirectly through increased appeal for tourists, businesses and residents. Town centres can have enhanced appeal and identity due of their historic past, which conservation and sensitive regeneration can help to maintain.

1.9. An understanding and appreciation of our heritage can encourage a feeling of identity, pride and belonging for residents, whilst heritage assets often play a central role in building local distinctiveness. A community's sense of place and the quality of our lives, including health and wellbeing, can be enhanced through their contribution to the local environment, culture, education and leisure.

1.10. The East Devon Local Plan sets out its commitments, strategies and policies for the district's heritage. The Heritage Strategy for East Devon provides more detail and will help to ensure that our historic environment and heritage assets are protected, maintained and enhanced to the advantage of future generations.

What does the strategy cover?

1.11. The strategy presents a central reference point for the historic environment of the East Devon district, providing information on its historic assets and a framework for the delivery of the Council's recommendations.

1.12. Whilst all historic influences on the character of East Devon inform the strategy, the focus is directed towards our more tangible heritage assets, where the Council has a direct role and responsibility, or influence, in the decision making or management process. A heritage asset is defined by central government[2] as:

Heritage Asset

"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)."

[1] DLUHC (2024) National Planning Policy Framework, para 203
[2] DLUHC (2024) National Planning Policy Framework, Annexe 2: Glossary

1.13. Strategy: the overall strategy for the future of our heritage can be met through a range of aims and objectives. These are addressed in Section 2 through three themes:

A: Understanding and appreciating our historic environment
B: Positively managing our historic environment and
C: Enhancing and benefitting from our heritage

The themes describe and analyse the district's assets and the Council's policies, programmes and management processes whilst identifying issues and opportunities for improvement. The objectives raised from each are developed into our plan of future actions.

1.14. Summaries: for ease of reading, each theme is followed by a summary of its objectives and recommended actions. The strategy does not need to be read in its entirety and these provide an overview of the information provided, objectives raised and actions proposed. An action plan is presented in Section 3, with all of the objectives and actions drawn from the themes, into one place.

1.15. Priorities: changes to public sector funding in recent years have meant limited resources within East Devon District Council both to manage our assets and to develop opportunities to benefit from our heritage. Our priority therefore continues to be ensuring that resources are managed accord to our statutory duties and agreed policies. Opportunities for cost effective solutions are also sought, including collaboration with existing and new partners and the potential for securing new sources of funding.

1.16. Local communities: the Localism Act (2011) introduced Neighbourhood Planning to Local Authorities, bringing new approaches and giving greater powers and opportunities for local communities to become involved in appraising and managing their local heritage. East Devon District Council has embraced neighbourhood planning, including policies relating to local heritage, with 27 'made' Neighbourhood Plans and another 15 in production (at the time of writing).

1.17. East Devon also has the advantage of many local historic interest groups and individuals in the district with extensive knowledge of our heritage assets. Support for the first Heritage Strategy demonstrated the high level of commitment from communities, Parish Councils and neighbourhood planning groups and the Council is keen to continue working with them to understand, enhance and positively manage our heritage. In this strategy we encourage and welcome the active participation and further involvement of our local communities.

1.18. Broader designations that inform the strategy are also considered, especially the National Landscapes, important parts of the landscape which are home to heritage assets and may form part of their setting. Others such as National Trust sites, Special Areas of Conservation and Sites of Special Scientific Interest are also mapped. These designations can have a positive influence on the enhancement and management of the district's heritage, which partnerships can help to maintain.

1.19. The strategy is not intended to provide an exhaustive description or analysis of our heritage but to provide examples of a range of our assets, whilst of other sources of information are detailed for further reference.

How has the strategy been prepared?

1.20. The first strategy was developed within the Council, engaging with specialist organisations, in particular Historic England, the East Devon National Landscape and Devon County Council Historic Environment Team and our Lead Councillor for Building Design and Heritage. It was then informed by public consultation responses from Parish and Town Councils, neighbourhood planning groups, local history and amenity organisations, interested individuals and statutory consultees.

1.21. As a light touch review of the original strategy, this updated version closely follows the same format but will deliver outstanding actions from the previous strategy as well as identifying new ones.



Fairlynch Museum, Budleigh Salterton, example of a 'Cottage Orné building

What has been achieved since the last Strategy?

1.22. Since the adoption of the original strategy in 2019, considerable progress has been made, particularly in achieving the short term aims. Delays associated with Covid and reduced resources have had an impact but, despite this, the Council has improved online access to guidance and undertaken extensive fieldwork.

1.23. Theme A objectives were to:
- **Enhance understanding of heritage assets and their significance**
- **Widen knowledge of the heritage of East Devon and its assets**
- **Celebrate and promote the heritage of East Devon**

1.24. Action: Provide information and guidance in the Heritage Strategy
Completed: the Heritage Strategy provides comprehensive information and guidance. Historic England, Devon County Council Historic Environment Team and East Devon AONB amongst other organisations acknowledged and commended the strategy on its comprehensive coverage of the issues.

1.25. Action: Provide links to further guidance through the Council's website
Completed: the new heritage webpage provides links to Historic England advice, national listings and reports, and the Devon County Council Historic Environment Record.

1.26. Action: Develop improved web pages for the provision of information on heritage issues relevant to East Devon, including the Heritage Strategy
Completed: the heritage webpage has been improved to include information on the heritage strategy, the list of local heritage assets, an on-line form for nominations for local heritage assets, links to further guidance and information on the latest news and projects.

1.27. Action: Promote strategy and web pages; develop a publicity plan to include press and social media
Completed: A publicity plan was considered by the Heritage Working Group and implemented with a series of press releases. Articles appeared on Facebook and Twitter and through the press, including the Exmouth Journal, promoting the heritage strategy and its initiatives.

1.28. Action: Support events such as the annual Heritage Open Days and the East Devon AONB Heritage Conference. Promote heritage strategy and website at heritage events.
A Planning Policy Officer (heritage) and Conservation Officer supported events including:
- The East Devon AONB annual conference in April 2019 (short talk / discussion)
- EDDC Neighbourhood Planning forum in October (presentations and discussion)
- EDDC member training (presentation, quiz and discussion)

1.29. Theme B objectives were to:
- **Positively manage the heritage assets of East Devon (Conservation Areas, Heritage at Risk and Local List)**
- **Encourage development which enhances distinctiveness**

1.30. Action: Prepare internal procedural guidance for conservation area review and management plans.
This has been completed, to include
- A new template for conservation area appraisal and review, including a process

- for updating the original (typewritten) text and transferring the hand drawn maps
- onto GIS.
- A new template for management plans, including updated legislation and policy
- A flowchart of the procedures to complete a conservation area review and
- management plan, including surveys, consultation, adoption and publication

1.31. Action: Develop a process for communities to help deliver reviews, including training and monitoring. Propose a suitable pilot scheme.
Completed: A process was established and criteria were developed for the selection of a suitable pilot scheme. East Budleigh was chosen as a pilot scheme and endorsed by Strategic Planning Committee. The process included

- Developing a programme of options working with a community group
- Working with partners to meet joint objectives.
- Enabling grant funding
- Sourcing a suitable consultant to deliver the main part of the training
- Developing a programme of training to be delivered by a consultant and EDDC staff
- Producing training material including presentations, plans and survey sheets, with feedback forms for participants to complete.

1.32. Action: Deliver a pilot scheme Conservation Area review involving community group/s to include local listed items. Monitor input, output, outcomes and estimate impact to inform future programme.
Delivery to date includes:

- Securing partners and funding including the East Devon AONB (Sustainable Development Fund Grant) and the Norman Family Trust.
- Establishing a training programme and material for the volunteers which can be
- reused in future projects
- Three days of training and workshops delivered by Locus Consulting, a specialist in heritage training and supported by a Planning Policy Officer (heritage) and a Conservation Officer for 14 members of the community.
- Training included the assessment of character and how to record it, understanding historic buildings and recording them in conservation areas and managing change in conservation areas, all of which included on site exercises, with notation of maps and completion of survey sheets to inform the East Budleigh Conservation Area Appraisal, Review and Management Plan.
- Producing a new Conservation Area Appraisal, Review and Management Plan for East Budleigh which meets all of the latest legislation, policy and guidance.
- Assessing, ratifying and publishing new items for the List of Local Heritage Assets
- Building skills and knowledge amongst the community to help protect and enhance the heritage assets of their area. All participants reported an improvement in their knowledge and understanding of conservation areas and commented that they found the training enjoyable, informative and inspirational.
- Publicity, including a series of press releases which were published on the EDDC Website, in the Exmouth Journal and on Facebook.

1.33. Action: Develop a programme to prioritise reviews over 12 years.

1.34. A programme has been considered, giving priorities to reviews based on criteria such as risk from development within Built up Area Boundaries, the condition of assets, the date of last review and the presence of active community groups with an interest in heritage. Research in June 2019 included an analysis of conservation areas within the historic town centres of East Devon with a view to bidding for Heritage Action Zone Funding. Information was gathered and assessed in particular for Axminster, Honiton, Ottery St Mary and Seaton conservation areas including heritage assets, empty buildings, traffic flow, active community groups and potential improvements that could be made. The resources needed to complete a review have also been considered. For example, some reviews may need to only be 'light touch' where not much change has been seen and there may be an active community group that could become involved in helping to update and review an appraisal, following on from the East Budleigh Pilot Scheme. New templates for Conservation Area Appraisal, Review and Management Plans have been produced to help with future reviews. Work to prioritise reviews is ongoing.

1.35. Action: Provide information and a link to the Historic England register of heritage assets at risk on the Council webpage:
A link has been added to the heritage webpage to the Historic England webpage which provides general information on heritage at risk and details of what is at risk locally.

1.36. Action: Produce a document advising communities on procedures for a Local List, with guidance on selection criteria. Public consultation and adoption.
Completed: A guide has been adopted and is published on the East Devon Heritage and Local heritage Assets webpage.

1.37. Action: Following adoption of a guide, receive submissions from communities and historic groups.
Submissions have been received from the Otter Valley Association and the East Budleigh Heritage Project and are being assessed. Some have been ratified and published.

1.38. Action: Set up procedures within the Council for assessing, recording and publishing a list of non-designated heritage assets
Detailed procedures have been established.

1.39. Action: Develop and deliver a programme based on items submitted, starting with a pilot scheme. Roll out to other areas subject to available resources.
All pilot scheme nominations for the list have been ratified and published. A programme has been established to assess a proposed list of nominations produced by the Otter Valley Association

1.40. Action: Build in heritage and local distinctiveness themes in the emerging Design Guide
Supplementary Planning Document, with a link to the Heritage Strategy. These themes have been included in the emerging Design Guide as important Characteristics however this has not progressed to adoption.

1.41. Theme C objectives were to:
 Work with partners and corporately to identify joint projects and maximise funding
 Work with communities

1.42. Action: Increase attendance at meetings or events with partner organisations to work towards common goals

The Conservation Officer attended partner meetings including those organised by the East Devon AONB, Devon County Council and Historic England.

1.43. Action: Create Council working group to work towards joint objectives and co-ordinate projects and programmes. Provide website links to regeneration, economy and tourism sectors.
This working group was established and was very successful however meetings ceased during Covid restrictions and the meetings have yet to be reestablished.

1.44. Action: Work with others to identify projects and sources of funding
Members of the Heritage Working Group have been productive in identifying new projects and funding including
- Heritage Action Zone and town centres funding: exchange of information
- Energy efficiency grants and loans, working with the Empty Homes Officer
- Energy efficiency in older buildings training

1.45. Action: Facilitate, or advise on, a range of training opportunities especially for neighbourhood planning / community groups with an interest in heritage.
- Information on training opportunities from various sources have been gathered which communities can use. Links are provided on the East Devon Heritage and Local Assets webpage.
- Presentations from the East Budleigh Pilot Scheme are available for future training, for example on heritage significance
- Training material is available for the development of conservation area review and management plans, including notation and survey sheets.
- Training material has been compiled for a Grade II listed building condition survey, based on that developed by Historic England.

1.46. Action: Produce a template to guide neighbourhood planning groups in site assessments in relation to heritage
A template has been produced.

Resource Limitations

1.47 Undertaking the actions identified in the first strategy have required a very significant resource commitment, particularly in establishing new processes, templates and sharing information. This has ensured that almost all of the short-term priorities have been met but it is not possible to dedicate the same degree of Council resources to strategy implementation going forward. This review commits to ensuring that the new processes continue to be successfully implemented and that information is kept up to date, but there is a greater emphasis on training and supporting local communities to ensure that they are able to take on some of the assessment work and evidence gathering at the local level.

Aims of the strategy

1.48. The overall aim of this document is to deliver a positive strategy for the conservation and enjoyment of the historic environment, in accordance with local and national policy[3]. In more detail, it aims to:

- ***Widen the knowledge and understanding of East Devon heritage by bringing together information and making it publicly accessible***
- ***Identify the heritage issues, challenges and opportunities for East Devon and recommend actions for the future***
- ***Involve the community and develop partnerships to make the most of the social, economic and environmental benefits that heritage can bring***
- ***Support the East Devon Local Plan, informing our policies and the overall approach of the Council***
- ***Celebrate the outstanding heritage that East Devon has to offer by promoting its assets and presenting a vision for the future***

The role of East Devon District Council and other organisations

1.49. There are many organisations, including Local Authorities, national and regional public bodies and local historic groups engaged in the planning and management of the historic environment; the roles of some are outlined below. Many have accessible information resources and details of these are provided.

[3] Aim 4: Neighbourhood Plans comply with the Local Plan, which in turn complies with national policy

Key organisations and sources of information

East Devon District Council

1.50. The Council has a conservation team, which carries out a range of statutory and non-statutory duties. Statutory duties for Local Authorities include the designation, review and management of Conservation Areas, determining listed building consent, advising on unauthorised works and maintaining a 'Buildings at Risk' register.

1.51. The Council also has a responsibility under the National Planning Policy Framework (NPPF), revised in 2024, to maintain or have access to Historic Environment Records containing up-to-date evidence about the historic environment. It does so through a partnership with Devon County Council's Historic Environment Team which also provides specialist advice on archaeology within the district. East Devon District Council is also responsible for implementing the NPPF in terms of planning decisions affecting designated and non-designated heritage assets.

1.52. Non-statutory duties in the conservation of the historic environment relate mainly to policy, guidance and advice, which are also touched on in Theme B, 'positively managing our historic environment.'

Historic England[4]

1.53. The role of this public body is to advise government on the designation of Listed Buildings, Scheduled Monuments, Registered Parks and Gardens, Battlefields and Protected Wreck Sites identified by them or put forward by individual request, and managing the list of designated assets, as well as advising the government on matters of World Heritage. They primarily provide advice on Grade I and Grade II* heritage assets and deal with Scheduled Monument consents. Information is available on designated assets in East Devon including those categorized as 'at risk'.

The organisation also carries out extensive research and monitoring of heritage assets and their value, and provides information on funding, with a comprehensive range of guides through their website. 'Heritage Counts' is an annual audit of England's Heritage, monitoring 'heritage indicators' for each region with information collected by the Historic Environment Forum and reported on by Historic England.

1.54. In April 2015, when the organisation changed its common name from English Heritage to Historic England, the charity officially called the English Heritage Trust took the name of English Heritage.

English Heritage

1.55. The English Heritage Trust is a company and a registered charity that manages over 400 of England's historic sites, including Blackbury Camp in East Devon, and also provides information on England's history through the ages.

Devon County Council Historic Environment Team[5]

1.56. The County Council also carries out a range of research and projects specific to Devon. Of particular interest is the database of Historic Environment Records

[4] https://historicengland.org.uk/
[5] https://new.devon.gov.uk/historicenvironment/

(HERS)[6] it maintains, which provides information on archaeological sites, historic buildings, historic landscapes and other heritage features, including designated and locally listed assets.

1.57. Data includes historic tithe maps, aerial photos from the 1940's (World War II), photographs and other published material, available to view in person or online. Reports and studies are available, for example, on 'landscape character mapping' which can reveal the human activities of agricultural and industrial practices through the ages.

1.58. More recently, a technique called lidar (light detection and ranging), provides airborne remote sensed data to discover what can't be seen below the ground or tree coverage, uncovering a wealth of evidence on the history of East Devon.

1.59. For example, a recent project (2016-18) is centred mainly on the distinctive landscape of the Blackdown Hills where lidar will be used, along with aerial photos and other sources, to provide archaeological information. National Mapping Programme[7] surveys also enhance our local Historic Environment Records in order to inform land management, conservation and research.

National Archives

1.60. The National Archives has information on records including that of land ownership, religious houses, royal grants and agricultural practices. Manorial documents are now collected, some of which are available to view online.

South West Heritage Trust

1.61. This Trust includes the resource Devon Heritage Centre which holds a large collection of records and published works relating to Devon's history including historic maps, illustrations, estate and manorial records.

National Trust

1.62. The National Trust (for Places of Historic Interest or Natural Beauty) is a large charity in England, Wales and Northern Ireland. The Trust aims to preserve and protect the heritage of the many historic houses and gardens it owns and has thousands of volunteers that help to care for these places. Information is available on a wide range of heritage issues.

East Devon National Landscape [8] and Blackdown Hills National Landscape [9]

1.63. The National Landscapes are managed by partnerships which include national agencies, local authorities, land owners, conservation organisations and community groups. Both partnerships provide much information and advice on the environment and heritage of their area as well as support for community projects. East Devon National Landscape holds an annual Heritage Conference and both organisations have delivered heritage projects within East Devon.

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[6] https://new.devon.gov.uk/historicenvironment/the-devon-historic-environment-record/
[7] Grant funded by Historic England and undertaken by Devon CC and AC Archaeology

[8] http://www.eastdevonNational Landscape.org.uk/
[9] https://blackdownhillsNational Landscape.org.uk/

The Jurassic Coast Trust

1.64. This is the lead organisation co-ordinating the conservation of the Dorset and East Devon Coast World Heritage Site (The Jurassic Coast).

Local History Organisations, Heritage Centres and Museums

1.65. There are many local historic societies and associations, heritage centres and museums providing more detailed information on the historic environment in their area, which are listed in Appendix 3. Information may also be available in libraries.



Sidmouth Museum, Church Street (above)

Honiton Museum, High Street (below)





Background Legislation and Policy

Government Policy and Guidance

1.66. The Government sets out its objectives relating to the historic environment and heritage assets through the National Planning Policy Framework. Consideration of the historic environment and its heritage assets is a principal objective of sustainable development, which may be achieved through the three broad social, economic and environmental roles, which are mutually dependent.

1.67. The NPPF states that plans "should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats[10]". This strategy should take into account:

a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

c) the desirability of new development making a positive contribution to local character and distinctiveness; and

d) opportunities to draw on the contribution made by the historic environment to the character of a place

1.68. National Planning Policy Guidance[11] advises Local Planning Authorities to identify specific opportunities within their area for the conservation and enhancement of heritage assets, which may require the development of specific policies, and that they should "consider the relationship and impact of other policies on the delivery of the strategy for conservation".

Legislative Framework

1.69. In addition to the Town and Country Planning Act 1990, the Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest, and the Ancient Monuments and Archaeological Areas Act 1979 provides specific protection for scheduled monuments.

1.70. The Localism Act 2011 introduced Neighbourhood Planning which gives people greater power to influence development within their local area and to consider the impact of proposals upon heritage assets.

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[10] DLUHC (2024), National Planning Policy Framework, paragraph 203
[11] DLUHC (2014), National Planning Practice Guidance, Paragraph: 003 Reference ID: 18a-003-20190723, Revision date: 23 07 2019

East Devon District Council Policy

1.71. The new East Devon Local Plan is in the final stages of production. The new Plan will run until 2042 and will replace the current, adopted Plan.

1.72. The emerging Plan will contain a suite of policies of particular relevance to the historic environment. These will be strategic policies and will include an overarching policy and then specific policies relating to listed buildings, conservation areas, Archaeology and scheduled monuments and historic landscapes, parks and gardens. The full Local Plan is available to view on the Council's website.

Section 2: Heritage Themes



Salcombe Regis

Theme A: Understanding and appreciating our historic environment

2.1. Our landscape has a sometimes complex pattern of fields, hedges, woodlands, farms and other buildings, road network, lanes and settlements which all form a part of the historic environment, created over many thousands of years by human activity. It is important to both understand and appreciate this environment and the heritage assets within it so that they can be positively conserved and enhanced for future generations to enjoy. The historic environment is defined by central government as:[12]

Historic Environment

"All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora"

2.2. Two objectives of this chapter (and, indeed, these could be considered the main objectives of the strategy overall) are to widen the knowledge of the historic environment of East Devon and to improve the understanding of our heritage assets and their significance.

Proposed Action:

Provide information and guidance in the Heritage Strategy

2.3. Our district has a unique historic environment and range of heritage assets, which can be understood better by looking at what has gone before. Throughout the district there is much evidence of human occupation from the past in the present, from its Stone Age hand axes and camps, Bronze Age Barrows and Iron Age hill forts to Saxon settlements and Roman roads, from medieval places of worship to Georgian, Victorian and Edwardian residences, from factories of the industrial revolution to World War II airfields, to name just a few.

2.4. In rural areas the history of both farming and extractive industries are evident in the vast number of marl pits used for improving soil, clay pits used for pottery industries, and in the distinctive medieval strip fields which may be glimpsed in places, beyond the high 'Devon' banks and hedgerows defining many of our country lanes.

2.5. The district contains much evidence of the Roman conquest in its army camps and forts, and later some villas or highly Romanised farmsteads and enclosed settlements. Parts of

[12] DLUHC (2024) National Planning Policy Framework, Annexe 2: Glossary

the Imperial road system still survive, including what was the Dorchester to Exeter Road and ‘Fosse Way.’

2.6. East Devon has a rich heritage of urban centres, varying greatly in nature and character. Ottery St Mary’s Saxon origins can be seen in the characteristic ‘star’ shaped pattern of its central routes, whilst this and the market towns of Honiton and Axminster were centres of the textile industry from medieval times. Honiton is a classic example of a planned town by the local lord, whilst Axminster originated as a Roman roadside small town.

2.7. Farmstead groupings are also an important local feature, especially those of medieval origin or planned as a part of land estates, including those seen at Broadclyst, Gittisham and Broadhembury, whilst some fine manor houses and ecclesiastical residences remain, such as the Bishop’s Court at Clyst St Mary.

2.8. The quarrying of stone, such as that at Beer, and pottery making were other important industries at this time and local building materials and traditions including cob and thatch all contribute to distinctive local styles.

2.9. Many of East Devon’s villages predate the 10th and 11th centuries, often centred around a parish church. As Christianity has been the main religion for more than 1500 years, churches form some of the most visible parts of our heritage, and the remains of an Abbey have survived at both Dunkeswell and at Axminster (Newenham Abbey).

2.10. East Devon is also rich in toll houses and coaching inns, and in assets linked to water power, such as mills, factories and hydraulic rams.

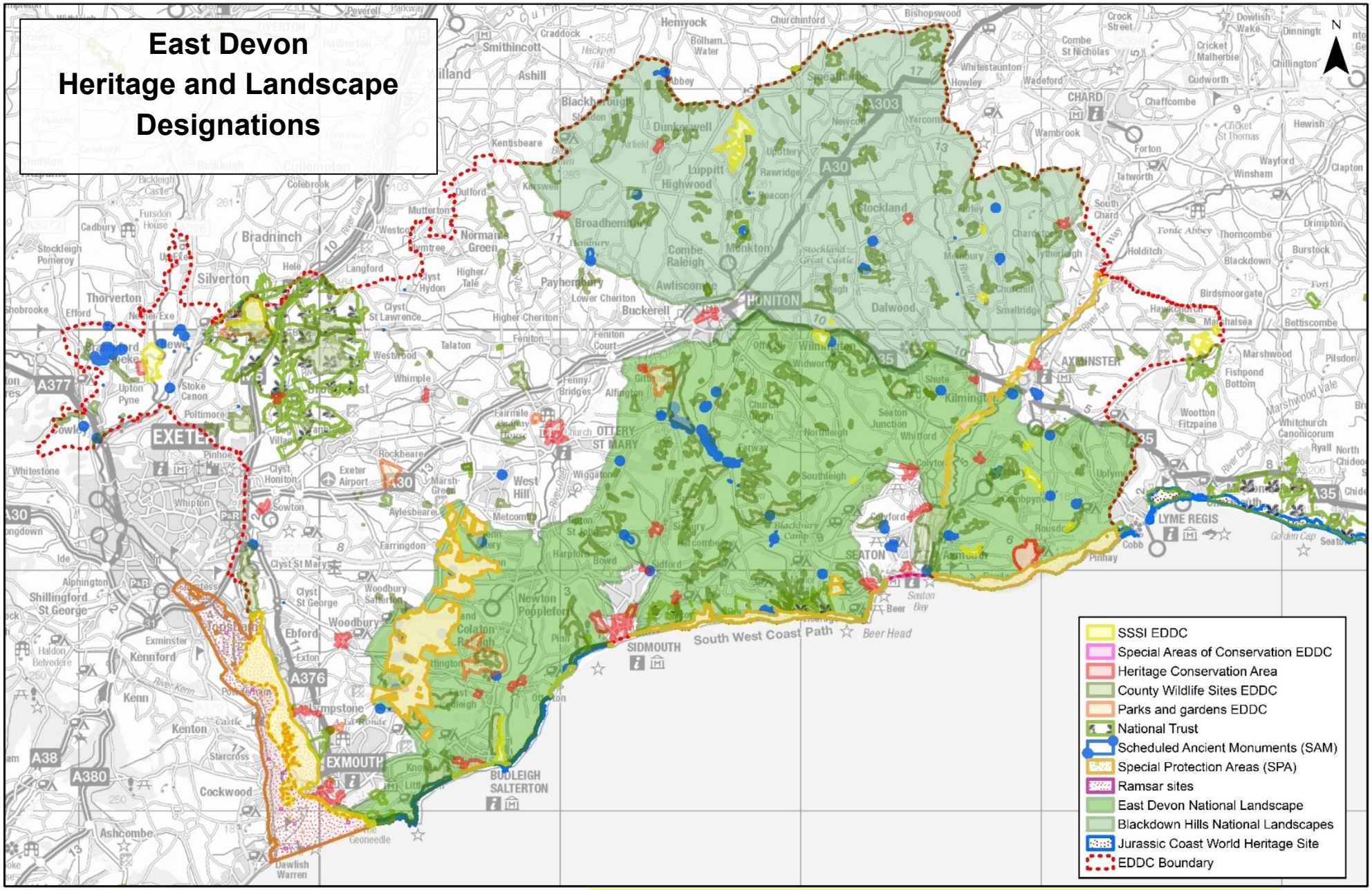
2.11. The Regency town of Sidmouth and other seaside resorts at Exmouth, Budleigh Salterton and Seaton all tell a story of their history through time, expanding with the development of railways. Good examples of the ‘Cottage Orne’ picturesque rustic buildings and later, fine Victorian terraces, Edwardian architecture and the Arts and Crafts style all contribute to distinctive town landscapes.

2.12. Meanwhile, villages along the coast retain a local character that has been largely unspoilt by the expansion of tourism. The Second World War has also left many traces including pill boxes, radar stations and airfields.




Second World War remains of military building at Beer Head; Dunkeswell Airfield and Heritage Centre

East Devon Heritage and Landscape Designations



This map can be enlarged on screen, or printed in a larger format.

More localised maps can be provided on request

0 3.25 6.5 13 19.5 26 Kilometers

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Heritage assets and their significance

2.13. Historic England describes how "some parts of the historic environment are important to society as a whole or to a group within it and merit some level of protection or consideration." [13] These are our heritage assets that future generations are likely to value too, for the same or similar reasons.

2.14. The term significance is used to describe (in heritage policy) "The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."[14]

2.15. Significance is a collective term for the sum of all the heritage values of a place, which may be assessed through evidential, historic, aesthetic and communal categories.[15]

2.16. Designation of an asset recognises the value(s) of its significance and gives it protection by law or policy for its management and enjoyment, now and in the future. The setting of an asset, when it makes a contribution to the significance of the asset, although not designated, may also be offered a degree of protection.

2.17. Designated heritage assets may be Listed Buildings, Scheduled Monuments, Conservation Areas, Registered Parks and Gardens, Battlefields or Protected Wreck Sites.

Nationally designated assets in East Devon

2.18. The most important heritage assets are formally recognised at a national level for their importance. In 2024, East Devon had 3,088 Listed Buildings, comprising nearly 4,500 individual buildings and structures (an asset may contain more than one individual building or structure), 8 designated parks and gardens and 112 scheduled monuments that are formally listed by Historic England. This includes two additions to the list since the last strategy, one Grade II* building and one Grade II building.

		Grade1	Grade II*	Grade II
Listed Buildings	3088	54	186	2,848
Scheduled Monuments	112			
Registered Parks and Gardens	8	1	1	6
World Heritage Site	1			
Conservation Areas	34			

Table 1: Designated Assets of East Devon District, March 2024

2.19. The number of listed buildings changes over time and up to date information can be viewed through the Historic England website.[16] The District also has a World Heritage Site inscribed by UNESCO[17] and 34 Conservation Areas that have been designated by East Devon District Council.

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[13] Historic England webpage (2024) Heritage Conservation Defined
[14] NPPF glossary 2024
[15] For a full explanation see Historic England (2008) Conservation, Principles Policy and Guidance
[16] https://historicengland.org.uk/listing/the-list/data-downloads/
[17] United Nations Educational, Scientific and Cultural Organisation

The Conservation Areas of East Devon

2.20. Conservation Areas are one of the fundamental heritage assets, which are areas defined on account of the value and worth of the features they contain. Designation helps to improve our understanding of an area's heritage and define what it is about the character or appearance that makes it special, and what should be preserved or enhanced. Legislation states that:[18]

> Local Authorities have a duty to "from time to time determine which parts of their area are areas of special architectural or historic interest, the character of which it is desirable to preserve or enhance", and to designate those areas as Conservation Areas.

2.21. When considering which areas should be designated, the Council looks at the quality and interest of an area as a whole as well as individual buildings and landscapes. A 'character appraisal' identifies the most significant aspects of the landscape, architecture and historic importance in our conservation areas.

2.22. Conservation Area appraisals also make an assessment of positive and negative features, and identify opportunities for improvement. For each settlement, our appraisals look at features including:

- The history of the buildings
- Topography and landscape setting
- Settlement form
- Important views and vistas
- Locally distinctive features and vernacular building styles
- Past and present activities and uses
- Streetscape and the public realm
- Green spaces and trees

2.23. Of the 7,000 (approximately) Conservation Areas in England, 34 have been designated in East Devon. They vary considerably in size and character, and cover parts of the main towns of Exmouth, Sidmouth, Seaton and Honiton, as well as the historic cores of smaller settlements such as Ottery St Mary and Budleigh Salterton.

2.24. Twenty Conservation Areas are within villages, mainly in rural areas, and nine of these are totally within a National Landscape. Four Conservation Areas are adjacent to the World Heritage Site ("Jurassic Coast") at Seaton, Beer, Budleigh Salterton and Combpyne Rousdon.

2.25. The district's Conservation Areas present a mix of forms, such as those with buildings arranged around a centre, appearing in a line, or more widely scattered, with many containing individual, groups and clusters of buildings listed in their own right as being of special architectural and historic interest.

[18] Planning (Listed Buildings and Conservation Areas) Act 1990

2.26. East Devon's Conservation Areas are diverse, from Victorian and Edwardian terraces and villas of our seaside towns in Exmouth, Budleigh Salterton, Sidmouth and Seaton, to those centred around medieval farmsteads of the Blackdown Hills, or around workers cottages such as in Gittisham. In the market towns of Ottery St Mary and Honiton a legacy of Saxon, Roman and planned medieval street patterns can be seen.

2.27. Conservation Areas vary in size from 3.46 hectares in Kilmington to 85 hectares at Combpyne Rousdon (which is also a registered park). Ottery St Mary and Combpyne Rousdon have large areas of landscape or garden. The Conservation Area with the largest built up area is in Budleigh Salterton comprising 30.27 ha, whilst Sidmouth Town Centre Conservation Area occupies a similar area of 28.91 ha. Conservation Areas in East Devon combine to make a total of approximately 518 ha.

A brief summary of each Conservation Area is provided in Appendix 2

2.28. **Of the smaller villages:** eleven Conservation Areas are a part of the villages of Brampford Speke, Broadhembury, Chardstock, Colyford, Gittisham, Kilmington, Musbury, Salcombe Regis, Sowton and Stockland, often covering a large part or most of the village. Six of these are entirely within a National Landscape whilst two are partly in or adjacent to one (see Appendix 2).

2.29. **Of the larger villages:** there are nine Conservation Areas within the villages of Beer, Broadclyst, Colyton, East Budleigh, Lympstone, Otterton, Sidbury, Whimple and Woodbury and are often located around the centre of the village. Three are entirely within a National Landscape (see appendix 2) whilst Broadclyst Conservation Area is partly within and surrounded by National Trust property.



Gittisham village: example of workers cottages and map showing extent of the Conservation Area (yellow) and Listed Buildings (pink).







Distinctive cottages in the villages of Sidbury, Broadclyst and Broadhembury

Towns

There is a concentration of five Conservation Areas in Sidmouth including the town centre, Elysian Fields, Bickwell Valley, Sid Vale and Sidford, and three in Exmouth at Albion Street, Bicton Street and Louisa Terrace. There also is one Conservation Area in each of the towns of Axminster, Budleigh Salterton, Honiton, Seaton and Ottery St Mary.

2.30. Five of the Conservation Areas, in Axminster, Budleigh Salterton, Honiton, Ottery St Mary and Sidmouth incorporate the historic town centre. These are described in more detail in Appendix 1.



Seaton: 19th Century 3 storey stucco villas in blocks of 4




Budleigh Salterton: late 19th Century housing with distinctive shutters and Exmouth: continuous terrace of late 18th and early 19th century properties

The Listed Buildings of East Devon

2.31. Listed Buildings are considered to be the best examples of buildings of heritage importance. Older buildings that retain much or all their original built fabric and features are more likely to be listed. If a building is deemed[19] to be of special architectural or historic interest, it is considered to be of national importance and worth protecting and is included on the list of buildings administered by Historic England.

There are 3 grades of listed building:

Grade I	Grade II*	Grade II
These are buildings of exceptional interest, sometimes considered to be internationally important. Only around 2.5% of listed buildings are rated Grade I.	These are particularly important buildings of more than special interest. Only around 6% of listed buildings are rated Grade II*.	These are buildings of special interest, which warrant every effort being made to preserve them. Accounting for 91.5% of all listed buildings, most domestic listed buildings fall into this category.




Examples of Grade I (St Mary's Parish Church) and Grade II* (The Priory) Listed Buildings in Ottery St Mary

[19] by the Secretary of State (for Culture, Media and Sport)

How Heritage Assets are chosen for listing

Since 2015, Historic England has been responsible for recommending buildings for inclusion on the statutory lists compiled by the Secretary of State. They consider buildings in 3 main ways:

***Spot listing** – looking at individual buildings brought to their attention by local authorities, amenity and historical societies and members of the public*

***Area lists** – every part of England has been visited by expert fieldworkers and the best buildings selected against the listing criteria*

***Thematic listing** – focusing on particular building types such as Industrial Heritage.*

Older buildings are more likely to be listed:

- *All buildings built before 1700, which survive in anything like their original condition, are listed*
- *Most buildings constructed between 1700 and 1840 are listed, though selection is necessary*
- *Between 1840 and 1945, only buildings of definite quality and character are listed, including those by renowned architects*
- *Post 1945, buildings have to be exceptionally important to be listed*
- *Buildings less than 30 years old are normally only listed if they are of outstanding quality and under threat.*

In choosing buildings, particular attention is paid to:

- *Special value within certain types, either for architectural or planning reasons or as illustrating social and economic history (for instance, industrial buildings, railway stations, schools, hospitals, theatres, town halls, markets, exchanges, almshouses, prisons, lock-ups, mills)*
- *Technological innovation or craftsmanship (e.g. cast iron, prefabrication, the early use of concrete)*
- *Association with well-known characters or events*
- *Group value, especially as examples of town planning (e.g. squares, terraces or garden cities).*

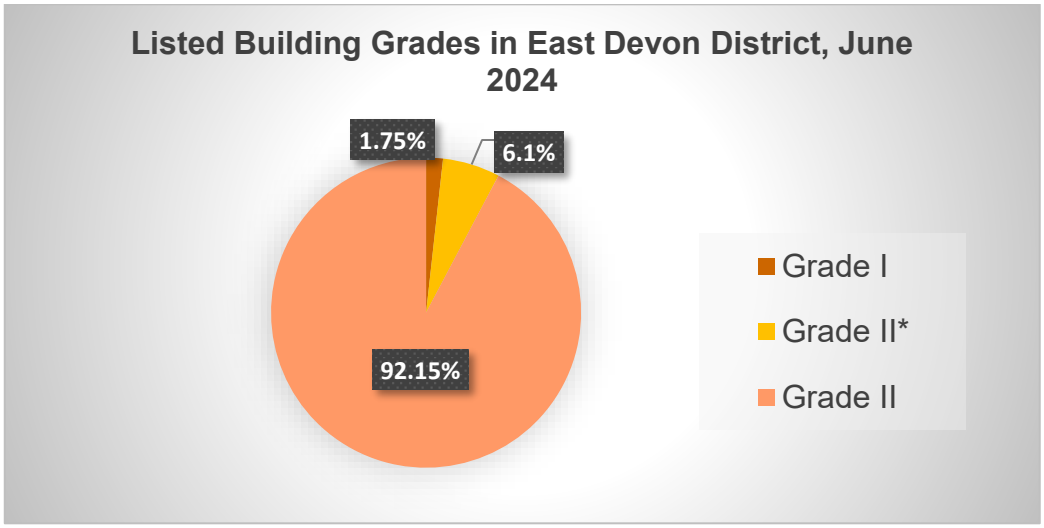


Table 2: Grades of Listed Building entries[20] in East Devon

2.32. The proportions of Grades I, II* and II are broadly representative of those in England as a whole, but with a slightly lower percentage of Grade I buildings.

The Parks and Gardens of East Devon

2.33. Formal parks and gardens and 'naturalistic created landscapes', were often provided alongside built features, especially grand country houses, though in some cases they may have been built as standalone features or integrated into a wider built fabric. In many cases these parks and gardens were also planted with significant collections of plants and trees and may contain built features within them such as summer houses or grottos that are of heritage importance in their own right.



Killerton Park and house, and Bear's Hut (originally a summerhouse built in 1808)

[20] A listed building entry may cover a number of individual units. Up-to-date information can be viewed at https://historicengland.org.uk/listing/the-list/data-downloads/

2.34. Given their heritage importance Historic England maintains a Register of Parks and Gardens of special historic interest in England, of which 8 are currently listed in East Devon: (See 2.49 for information on undesignated parks and gardens of local interest).

Bicton:	Grade I
Killerton House:	Grade II*
Rockbeare Manor:	Grade II
A La Ronde and the Point-In-View:	Grade II
Combe House:	Grade II
Rousdon:	Grade II
Connaught Gardens:	Grade II
Cadhay Park:	Grade II

Example: Connaught Gardens

2.35. This is an interesting example of a Registered Park. Adjacent to Sidmouth town centre and the sea front, the park lies partly within the World Heritage site and an extensive view of the Jurassic coast can be observed from this vantage point. The western side includes part of the National Landscape and a Grade II listed building, whilst the eastern side is within a Conservation Area. Adjacent to the park to the west is a County Wildlife Site and to the south a Site of Special Scientific Interest. The park is a meeting place for the community through its open air cafe and theatre, a greenhouse and many seating areas.



Connaught Gardens Registered Park, Sidmouth

Archaeological heritage

2.36. East Devon contains sites and finds dating from the oldest periods of occupation in Britain by humans and their predecessors. Human activity in the district became frequent from 250,000 BC and has left its mark with, for example, hand axes and other tools from the Lower Palaeolithic (Old Stone Age) found in the Axminster area.

2.37. From the 4th Millenium BC (during the New Stone Age) the construction of monuments began, including the causewayed enclosure at Hembury, now a part of the landscape along with our Bronze Age barrows and Iron Age hillforts. These provide a link with our historic and prehistoric past giving an insight to the lives of our ancestors. Most of the landscape we can see today dates from the medieval and post-medieval enclosure of the landscape.

2.38. Archaeological sites not only represent our heritage but can contribute to our sense of place. However this legacy is subject to a growing range of pressures, both by humans and natural processes such as erosion.

The Scheduled Monuments of East Devon

The most important archaeological remains are formally recorded as Scheduled Monuments.[21] Historic England carries out a programme of scheduling these nationally important archaeological sites but anyone can make a nomination to Historic England.

2.39. In 2024, East Devon had 112 Scheduled Monuments, notably its prehistoric Bronze Age bowl barrows and Iron Age hill forts. It has a diverse range including 6 ‘castles’, 6 forts, 2 abbeys, 6 bridges, 8 crosses, a holy well, a prehistoric field system, a manorial settlement, a Roman villa and an ‘Ice House’.

2.40. However, more than 60 of the district’s Scheduled Monuments are ‘barrows’, which are particularly abundant around Farway Hill, Gittisham, Woodbury Common and in the Rewe, Upton Pyne and Bramford Speke area. Barrows are a type of burial mound where earth, and / or stone is used to cover a tomb and ‘bowl barrows’ are named due to their appearance of an upturned bowl. They were created during the late Neolithic to late Bronze Age and provide important information on beliefs and customs as they served a ceremonial or ritual purpose. Barrows are often isolated but many occur in groups and are described as barrow cemeteries, three of which are in East Devon.



Farway: Bronze Age barrow



Blackbury Camp Iron Age hill fort

[21] *Monuments are protected by the Ancient Monuments and Archaeological Areas Act (1979)*

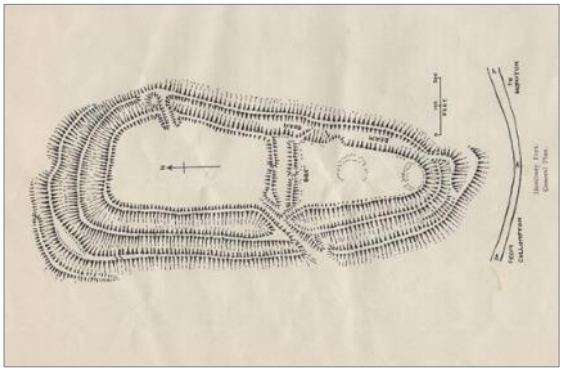
Example: Farway Hill barrows form part of the most dense and extensive concentration of barrows in Devon. They are diverse in form and size and some are a part of a barrow cemetery, whilst their association with Farway Castle provides additional historic interest.

2.41. **Hillforts:** Characteristic of the Iron Age, the remains of hillforts at Woodbury 'Castle', Blackbury Camp and Hembury have been tested by excavation and reveal complex entrances and ramparts. Other examples are the Seaton Down (inland) and Berry Camp (coastal) promontory forts.

2.42. **Roman villas:** Evidence of Romanised buildings or 'villas' at Seaton and Uplyme indicate that people eventually accommodated to Roman rule in this area.

2.43. **Castles:** The remains of structures, locally called castles but which are pre-historic hillforts, are also located at Belbury, Membury, Musbury, Sidbury and Stockland.

2.44. Concentrations of Scheduled Monuments can be found in locations near Brampford Speke, at Killerton Park, Farway Common and Woodbury Common, as seen on Map1.



Hembury Fort Drawing from the 1930's[1]: *This scheduled monument has a complex history from being a settlement during the Early Neolithic period, a Hillfort during the Iron Age and then a base for the Roman army in the first century. Its interesting history is currently included as part of a school curriculum.*

Hembury Fort scheduled monument, Payhembury (above)





Part of Dunkeswell Abbey scheduled monument (see also page 48) and medieval churchyard cross at St John's the Baptist Church, Broadclyst (above right)

World Heritage Site

2.45. A World Heritage Site is “a natural or man-made site, area or structure recognised as being of outstanding international importance and therefore as deserving special protection.”[22] Sites are nominated to and inscribed by the World Heritage Convention (part of UNESCO). The basis of world Heritage Site significance is the concept of Outstanding Universal Value. Natural England oversee the protection of the Sites of Special Scientific Interest that underpin the protection of the Jurassic Coast.

2.46. The Dorset and East Devon Coast World Heritage Site (also known as the ‘Jurassic Coast’) was the first natural environment designated World Heritage Site in England, and is one of only 17 in England and 31 in the UK. Its 95 mile coastline extends from the River Exe in East Devon to Studland Bay in Dorset. Most of the East Devon part also falls within the East Devon National Landscape. The coast’s exposed sedimentary rocks give a unique insight into 185 million years from the Triassic, Jurassic and Cretaceous periods. Further, there are heritage assets present as a consequence of the geology and a result of human interaction with it, for example Exeter Cathedral’s quarries at Dunscombe and Beer.





Parts of the World Heritage Coastline looking west from Beer Head revealing Cretaceous white chalk and greensand, and at Sandy Bay Cliffs, Exmouth made up of Triassic sandstone and mudstone.

Undesignated heritage assets in East Devon

2.47. The majority of heritage assets in East Devon, whether buildings, archaeological sites or areas of historic landscape character, do not enjoy statutory designation. Their conservation relies on the planning system and positive management by land and property owners. The Devon County Historic Environment Record at the time of writing (2024) records 21,643 heritage assets (designated and non-designated) that fall within the early prehistoric to modern periods.

2.48. Some of these may have the same significance as a designated heritage asset but have not yet been considered for designation. This would include such sites as the small Roman fort at Pomeroy Wood, Gittisham, and parts of the World War II Taunton Stop Line defences in the Axe Valley. Others are of regional or more local importance, but all are irreplaceable and require consideration in planning decisions.

2.49. In addition to the eight parks and gardens included in the Historic England Register, twenty five sites are included in the Devon Gazetteer of Parks and Gardens of local historic

[22] Collins English Dictionary (2024)

interest as important designed landscapes in the local context of Devon. Records are maintained by Devon County Council's Historic Environment Team.

2.50. In Theme B the strategy sets out proposals, working with local communities, for the means to establish and manage a list of undesignated assets.

Landscape and natural environment designations

2.51. Whilst this strategy is primarily concerned with built heritage, East Devon also has areas of landscape and natural environments of great quality. In many cases these areas are home to heritage assets and form part of their setting, while landscapes and environments, having been informed or 'created' by past human activity such as parks and gardens, historic orchards or medieval field patterns, can be heritage assets in their own right. In this context, to some degree much of the landscape and countryside of East Devon can be seen to have a heritage value, though many traditionally farmed landscapes, in particular, have been 'improved' and lost much or some of their heritage value.




Landscapes: Blackdown Hills, view north from Honiton

National Landscape

2.53. A National Landscape (known as Areas of Outstanding Natural Beauty prior to 2024) is an important landscape with such outstanding distinctive character and natural beauty that it is protected in the national interest and has been designated by Natural England. East Devon has a landscape of exceptional quality, reflected in the designation of two National Landscapes that cover about two thirds of the District, and that also includes a small part of the Dorset National Landscape. National Landscape Management Plans actively promote the conservation of, access to and enjoyment of their historic environments.




Landscapes: Woodbury Common Pebblebed Heaths and view towards East Hill. An area of high environmental and heritage value with a concentration of landscape and heritage designations, within East Devon National Landscape

East Devon National Landscape

2.54. This area lies totally within East Devon and mainly in the southern third of the district (see map 1). It was designated in 1963 and covers 103 square miles (32%). The south includes part of the dramatic 'Jurassic Coast' World Heritage site. Inland, large expanses of heathland provide a contrast to woodlands and river valleys in the predominately pastoral landscape. The East Devon Pebble Beds at Woodbury and other commons form the largest single block of lowland heathland west of the New Forest. Steep sided Devon hedge-banks border fields and narrow country lanes, leading to the many villages and hamlets, with many houses and cottages built of local stone, pebbles, thatch and cob.

Blackdown Hills National Landscape

2.55. This area includes land in both Devon and Somerset and covers mainly the north eastern third of East Devon (see map 1). Designated in 1991, the National Landscape is a relatively unspoilt, diverse rural landscape. Stretching from a prominent steep scarp in the north, the area dips gently southward as a flat-topped plateau to Honiton in the South, dissected by spring-lined valleys. The traditional pattern of villages and hamlets along the valleys remain largely unchanged among some medieval patterns of small enclosed fields and narrow lanes with high hedge banks. Villages, hamlets, individual buildings and their settings form a vital element of the character of the Blackdown Hills, particularly because of the widespread use of chert, a local stone, and the area's well preserved, distinctive architecture.

Natural Landscapes and Green Infrastructure

2.56. There are many environments in East Devon that are also protected on account of their biodiversity or geological interest. Whilst typically, heritage considerations or assets would not form part of the reason for their designation, it may be that human management and activity has 'created' the biodiversity or geological interest. There can therefore be heritage interests that overlap the more formal biodiversity or geological interests of their designation.

National and International Biodiversity and Geodiversity Designations

2.57. Special areas of conservation: These are strictly protected sites designated under the EC Habitats Directive relating to species other than birds.

2.58. Special protection areas: These are designated under the EU and are strictly protected sites for rare and vulnerable birds.

2.59. Sites of Special Scientific Interest: These are designated by Natural England to conserve their wildlife or geology.

2.60. Ramsar Sites: These are designated for the conservation and wise use of wetlands and their resources, when they meet the criteria of international importance.

Further information on heritage assets

2.61. In addition to providing information within this document, the Council has met the action in the original strategy to provide improved web pages for heritage advice, guidance and information, including links to other organisations specialising in heritage. This will continue to be updated throughout the life of this strategy. It has the potential to host a forum for the exchange of information on heritage issues however this would require resources that are not currently available.

Proposed Actions:

- *Continue to develop and improve web pages on the Council's website for the provision and exchange of information on heritage issues relevant to East Devon*
- *Provide links to further guidance through the Council's website*

Promoting the heritage of East Devon

2.62. Apart from an improved website, the Council has further promoted the heritage of East Devon through publicity, hosting an occasional event which could include workshops and attendance at other events in accordance with the original strategy. This work will be ongoing throughout the life of this strategy.

Proposed Actions:

- *Maximise opportunities to promote the Heritage Strategy and improved web pages, including use of social media*
- *Host an occasional heritage themed event / workshop for Members and community representatives (this may be undertaken as part of wider Neighbourhood Planning events)*
- *Support local heritage events, such as the as the annual Heritage Open Days and the East Devon National Landscape Heritage Conference, promote the Heritage Strategy and website at heritage events*
- *Encourage local groups and museums to engage with local schools*

Theme A Summary

- *Our historic environment includes the built environment, archaeology and green landscapes which make our place distinctive*
- *Heritage assets are assessed by their 'significance' and the setting of an asset can also be significant*
- *Heritage assets may be nationally designated, or undesignated (but may be on a Local List)*
- *The District's designated heritage assets include Listed Buildings, Scheduled Monuments, Registered Parks and Gardens and Conservation Areas. East Devon also contains part of a World Heritage Site Coastline*
- *The District has 34 Conservation Areas varying widely in character*
- *Listed Buildings and Parks and Gardens may be Grade I, II* or II*
- *The District has landscape designations including National Landscape and many biodiversity and geodiversity designations*
- *East Devon has an abundance of undesignated heritage assets, some of which are of the same importance locally as designated ones*

Objectives and Actions:

1 ***To enhance understanding of our heritage assets and their significance. Actions:***

- *Provide information and guidance in the heritage strategy*
- *Provide links to further guidance through the Council's website*

2 ***To widen knowledge of the historic environment of East Devon and its assets. Actions:***

- *Continue to develop improved web pages on the Council's website for the provision of information on heritage issues relevant to East Devon*
- *Encourage local groups / museums to engage with local schools*

3 ***To celebrate and promote the heritage of East Devon. Actions:***

- *Promote the strategy and improved web pages*
- *Support local heritage events, promote the strategy and website at events*
- *Host an occasional heritage themed event / workshop*

Theme B: Positively managing our historic environment

2.63. Our heritage assets are an irreplaceable resource, which make a valuable contribution to the character of East Devon. They generate many benefits, as explored in Theme C, enriching the quality of life for residents and visitors whilst helping to boost the local economy.

2.64. Without management, heritage assets may start to deteriorate, through either human activities or natural processes such as weathering. It is important therefore to address this with the positive management of our assets, whilst supporting new development that enhances local identity and distinctiveness.

East Devon District Council staff resources for heritage work

2.65. The Council places considerable weight on the importance of protecting the built heritage of East Devon, but it does so with limited resources. As a consequence, the emphasis in Council work has been to undertake regulatory tasks that it is required by law to do (specifically determining planning applications and listed building consent applications), rather than the more proactive aspects of conservation.

2.66. Combined with other economies due to the spending review within local government, this has meant very limited resources for conservation staff to carry out work such as monitoring buildings at risk, reviewing Conservation Areas and developing new opportunities through partnerships and communities.

Working with communities

2.67. The Localism Act (2011) encourages and gives additional powers for local communities to contribute to decision making in their areas. Since then, communities across the country have very successfully helped to assess what makes their location distinctive, appraised and reviewed Conservation Areas and management plans, monitored buildings at risk and identified assets for local listing.

2.68. The original strategy introduced a role for our local communities in some tasks, with Council support, and this has so far proved successful. There is a wealth of enthusiasm and expertise in our communities that could be further engaged and some actions have been updated to reflect the greater role that they can now play, especially where this will utilise guidance and templates produced in response to the original strategy. Our proposals are set out in more detail in relation to specific tasks in this section, and more generally with respect to training and building capacity within the community, in Theme C.

Proposed Action:

- *Facilitate and advise on training for local communities to assist in identifying and managing heritage assets, especially neighbourhood planning and other community groups with an interest in heritage (this Action is a part of Theme C)*

Designated heritage assets: development management

2.69. Most heritage assets are in private ownership and are maintained and managed by their owners. This is especially the case in respect of Listed Buildings, which are mainly domestic properties that are lived in by the property owners. These are typically well maintained and retain the features and integrity that warranted their listing in the first place.

2.70. However some maintenance and 'home improvements' can cause harm and should not in any case be undertaken in the absence of listed building consent (and potentially also planning permission). Historic England provides a range of guidance advocating good practice in the maintenance, repair and improvement of older buildings that are sympathetic to their historic character.

2.71. The Council has a range of legal and regulatory powers to manage heritage assets and development, whilst there is a facility to support and encourage good practice. For example, planning permission and listed building consent are two separate consent processes granted by the Council through regulatory powers.

2.72. The main means by which East Devon District Council manages designated assets is through the statutory powers it exercises as the Local Planning Authority.

2.73. The government sets out national policy with respect to the determination of planning applications which may affect heritage assets in the National Planning Policy Framework.[23]

East Devon Local Plan Policy

2.74. In accordance with national guidance, the East Devon Local Plan elaborates on and provides more policy detail for the determination of applications. The document sets out policies for the management of development including the protection of archaeological sites, listed buildings, Conservation Areas and other heritage assets.

2.75. In most cases sympathetic development schemes can be bought forward but the Council will not grant permission for development involving substantial or total loss of significance of a designated heritage asset unless it can be demonstrated that it is necessary to achieve substantial public benefits that outweigh the harm or loss. Criteria apply, which are set out in the Heritage Chapter policies of the local plan.

2.76. In addition to this, the Local Plan allocates development sites. Site assessments are undertaken as part of the allocation process to ensure that, in principle, development will not harm important interests including by negatively impacting upon heritage assets or their setting. In some cases development may actually enable better revealing of an asset or better understanding or access to it, particularly if archaeological assessment is required prior to development taking place. Where sites are allocated development will still need to accord with the policies of the Local Plan and will still require planning permission. Further archaeological assessment and recording may be required through planning conditions on the planning permission.

[23] DLUHC (2023) National Planning Policy Framework Paragraphs 202 - 221

Planning applications

2.77. Where development is proposed, there is usually a need to obtain planning permission and / or building regulations approval.[24] In considering planning applications the Council will apply the relevant local and/or neighbourhood plan policies and take into account heritage considerations and, specifically, potential adverse impacts on any heritage asset or the setting of a heritage asset that might arise and seek to secure the best outcomes whilst minimising adverse impacts.

Listed building consent

2.78. Heritage Assets (Listed Building Consent is something of a misnomer, as it relates to heritage assets and is not restricted to buildings) and their settings are an important element of East Devon's character that the Council wishes to preserve. Alterations must be carried out with the greatest skill and care to ensure that changes are not detrimental to the special architectural and historic interest of the building.

2.79. Listed building consent, which is separate from any requirement for planning permission, is required if the works have an impact on the significance of the heritage asset. Where a listed heritage asset is involved in, or is the subject of a development proposal, it can be that both planning permission and listed building consent are required to allow for development to proceed. It can also be the case that development is acceptable under one consent but not the other, in which case it should not proceed.

2.80. The impact of a proposal on the setting of an asset contributes to a buildings significance as it provides a context. Although setting is not a heritage asset in itself, it is vital to an asset's significance. When considering development proposals the significance of any heritage assets and their settings should be established. Detailed guidance is available in publications on 'Setting' and 'Curtilage' through Historic England.[25]

Listing enhancement

2.81. Historic England now offers a more detailed entry for listed buildings which sets out clearly why a building has been listed and where its significance lies. An 'Enhanced List Entry' may exclude parts of the property internally and externally including extensions and other structures within the curtilage that would have been included under an old List Entry, where they are not part of its significance or the reason for original listing. An Enhanced List Entry provides certainty and clarity, informing decisions on what changes are possible for owners and local authorities where Listed Building Consent is needed.

Listed Buildings Enforcement Action

2.82. The owners of listed buildings are encouraged to keep their historic buildings well maintained and in use, although they are under no statutory obligation to do so. However when a building is deteriorating, the Council may take action to require the owner to undertake essential works through a Section 215 Notice[26], s.48 Repairs Notice or a s.54[27] Urgent Works Notice. Non-compliance with a notice can lead to prosecution or work undertaken by the Council, with measures to recover the cost.

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[24] "development" is legally defined and some minor building works do not constitute development

[25] Historic England (2017) The Setting of Heritage Assets; (2018) Listed Buildings and Curtilage Advice note 10.

[26] Town and Country Planning Act (1990)

[27] Planning (Listed Buildings and Conservation Areas) Act 1990

2.83. Unauthorised works to a listed building is an offence under Section 9 of the Planning (Listed Building and Conservation Areas) Act 1990. A person who is guilty of such an offence will be:

- Liable on conviction to imprisonment for up to 3months or a fine not exceeding the statutory maximum or both; or
- Liable on conviction to imprisonment for a term not exceeding 12 months or a fine or both. In deciding the amount of fine to be imposed on any person convicted, the court will consider any financial benefit which has been gained as a result of the offence.

2.84. The Council has a range of possible courses of action available to deal with cases of unauthorised works to listed buildings. These include the following:

- seek a prosecution;
- administer a formal caution. This is a formal process whereby the perpetrator signs a statement admitting the offence and submitting to the caution. It may be referred to at the sentencing stage if the same person is ever found guilty of a subsequent offence. It may also be taken into consideration when deciding whether or not to prosecute at a later stage for another similar offence;
- serve a breach of condition notice –note it is an offence to fail to comply with a condition on a listed building application;
- serve a temporary stop notice or stop notice;
- negotiate the reversal of works/works to address the unauthorised works;
- serve an enforcement notice to remedy the works –note that there are no time limits for issuing listed building enforcement notices;
- take no formal action. This may be accompanied by informal action, such as advising the alleged offender to ensure that the incident is not repeated.

2.85. In the case of empty properties, an improvement notice[28] may be served on owners initially, but if this is not effective works can be completed by the Council whilst charging the owner for these essential repairs. Council tax may be charged at 100% for properties that have been empty for over 2 years, whilst management orders and compulsory purchase may be actioned where other methods have not been effective.

Protecting National and Locally Important Archaeological Sites

2.86. Archaeological heritage is often vulnerable and easily damaged. Development won't be permitted if it would harm nationally designated sites, and that which would harm locally important sites or their settings will only be permitted if the need for development outweighs the damage to the archaeological interest of the site and its setting.

Protecting Scheduled Monuments

2.87. Any work to a designated monument requires Scheduled Monument Consent, for which applications are made to Historic England. Preservation in situ is considered to be the most appropriate means to ensure protection.

Protecting Registered Parks and Gardens

2.88. For any proposed development, the impact on the special character of a registered park or garden must be considered and is a material consideration in the planning process.

[28] Section 11&12 Housing Act (2004)

Local List of undesignated assets

2.89. Many buildings, structures, landscapes and archaeological sites contribute to the special character of East Devon but do not meet the criteria for national listing. The Council recognises the valuable contribution that these heritage assets make to local areas and is reviewing how they are identified and publicised.

2.90. A feature of local interest is one that retains its historic form and external detail and makes a positive contribution to the architectural and historic character of the locality for one or more criteria, such as age, rarity, historic association or aesthetic value.

2.91. Assets that meet the criteria can be placed on a Local List of undesignated assets which gives recognition to their importance and may be taken into consideration in development proposals, which can help to speed up the planning process. A Local List can also help to build a more comprehensive picture of an area's significance for future planning decisions.

2.92. The previous Strategy committed to producing guidance on the process and selection criteria for submitting potential heritage assets to the Council for consideration and then establishing and maintaining a list of undesignated heritage assets. The Council has met these commitments and will continue to support local communities putting forward buildings and structures that are important to them. The list, and guidance, are available on the council's website East Devon Heritage and Local Heritage Assets - East Devon

Proposed Action:

Maintain and publish the local list of undesignated assets:

- *Continue to publicise the Local List Guide for East Devon, which advises on procedures and guidance on selection criteria*
- *Continue to receive and consider submissions from community and historic interest groups*

Heritage assets at risk

2.93. Designated heritage assets may be classified as 'at risk' due to negative changes through neglect, inappropriate development, crime or damage and can reflect or impact on an area's social and economic decline.

2.94. Whilst most designated heritage assets of East Devon are in good or reasonable condition, a small proportion are classed as 'at risk.' There were no Conservation Areas at risk as at March 2024, in comparison with 6% in England.

2.95. From the Historic England Heritage at Risk register 2023, which includes Grade I, Grade II*, Grade II Places of Worship and Scheduled Monuments there are 26 listed items defined as being at risk, an improvement on the 46 recorded in 2018 and considerably better than the national picture:

5 are Grade I:	*2 Listed Buildings, 2 listed Places of Worship and 1 Registered Park*
2 are Grade II:*	*1 Listed Building and 1 listed Place of Worship*
1 is Grade II:	*1 Place of Worship*
18 are Scheduled Monuments	

Table 3: East Devon Heritage Assets at Risk Grading, 2023 *(Historic England Website, March 2024)*

2 are category A:	*Immediate risk of further rapid deterioration or loss of fabric; no solution agreed: Church of St Lawrence (Grade I) and Poltimore House (Grade II*); the former is owned by a religious organisation, the latter is not in use and is owned by a heritage charity.*
4 are category C:	*Slow decay; no solution agreed: 2 are the Tithe barn and stable at Bishop's Court, Clyst St Mary (Grade I) and privately owned, the other 2 are Grade II* and Grade II churches*
1 is category D:	*Slow decay; solution agreed but not yet implemented: This is a Grade II* church*
The remaining 19 assets at risk do not have a priority grading	

Table 4: East Devon Categories of Buildings at Risk 2023 (as per table 3)

Of the 26 assets at risk, 2 are noted as improving in condition and one is recorded as stable. Overall the situation has improved but a number of scheduled ancient monuments remain at risk of deterioration due to factors outside the planning system, such as coastal erosion and farming practices, with barrows being at particular risk from agricultural intensification and plant growth. Historic England do not monitor Grade II listed buildings at risk unless they ae ecclesiastical buildings.

Scheduled Monuments at risk

2.96. Scheduled monuments may be vulnerable to development but are also exposed to pressures beyond the planning system, such as agricultural intensification, forestry and coastal erosion, which may present the greatest threat. In the southwest, 16% of scheduled monuments were on the at risk register in 2016, a trend which has gradually decreased from 21% in 2009.

2.97. In East Devon 26 (40%) out of the 64 registered barrows are at risk, and are the majority of scheduled monuments at risk, suffering from deterioration due to causes such as plant or shrub growth, farming activities or animal burrowing.

Managing assets at risk

2.98. Assessing the overall condition of assets and identifying those at the most risk helps to provide a basis for prioritising actions and resources, where available, to mitigate pressures and threats to those assets. 'Heritage at Risk' is an annual survey, compiled by Historic England, of assets whose value is under threat, as shown in Tables 3 and 4. The condition of assets on the list are monitored and updated regularly by Historic England, with generally more frequent attention to those considered most at risk. New entries that are put forward for the list are also assessed by Historic England's regional team in the Southwest.

2.99. Historic England does not monitor Grade II listed buildings, unless they are places of worship, however have started a project, the "Grade II Listed Building Condition Survey". This offers support and training for specialist and community groups and individuals to help identify any Grade II assets at risk. Training is currently available for volunteers through the Historic England website.

2.100. A programme of monitoring buildings at risk in East Devon could help to identify patterns or trends and would be a valuable resource to help the council manage the most vulnerable assets. A programme could be established for communities to help assess the condition of Grade II buildings in their local area, setting priorities within conservation areas, for example.

2.101. Providing a link through the Council's webpages to the Historic England list of buildings at risk and a means of reporting information would help partners, organisations and communities to identify new items for the list, and potentially help to monitor the condition of those on the list.

2.102. The National Landscape Partnerships have been actively involved in managing Scheduled Monuments at risk. East Devon National Landscape has been working on improving the condition of six at-risk assets with the help of volunteers. Meanwhile, the Blackdown Hills National Landscape have trained volunteers as Historic England Heritage Wardens to record the condition of Scheduled Monuments in that area, including some site maintenance work.

Proposed Actions:

- *Continue to provide up to date information and a link to Historic England heritage assets at risk through the Council's webpages*
- *Liaise with partners and organisations to implement the process for recording and reporting on assets at risk*

Managing and protecting our Conservation Areas

2.103. A range of planning controls exist to ensure that the special qualities and fabric of an area are not undermined by the loss or damage of important features, or damaged by inappropriate, insensitive developments. All properties are required to have their conservation area status recorded as a local land charge so that new owners are aware of their designation.

2.104. The main regulatory role the Council has is to determine planning applications taking Conservation Area status into account, guided by an area's character appraisal. Proposals for development are only permitted where they would preserve or enhance the appearance and character of the area so it is important that any new development through siting, scale, design and use of materials is complementary to the character and makes a positive contribution to the appearance of an area.

2.105. Other means of protection include control over the demolition of unlisted buildings and of works to trees, restrictions on the types of advertisement permitted and on other types of permitted development through an Article 4 direction.

2.106. Further, the local plan describes how the Council will take positive steps to enhance character within the Conservation Areas, for example by encouraging an emphasis on the renovation and re-use of buildings rather than demolition and redevelopment.

2.107. The Council are legally obliged to review Conservation Areas 'from time to time' to include an assessment of whether boundaries need to be amended and new areas designated, and also have a duty to formulate and publish proposals for the preservation and enhancement of conservation areas (management plans).

Threats:

Increased traffic and parking problems, erosion of character through insensitive repairs, out of character shop signage and replacement of frontages, vacant buildings, cluttered signage, street furniture and overhead utility cables.

Opportunities:

Increase in community involvement, improved knowledge for local community groups, input to neighbourhood plan, partnership working in regeneration areas and tourist locations, re-use of vacant buildings attracting grant aid, sensitive repairs, conversions and development using local materials with guidance.

Table 5: Examples of threats and opportunities within a conservation area




Examples of detracting features in Conservation Areas: Cluttered signage at Ottery St Mary (2013) and overhead power lines at Sidford (2018)

2.108. A 'Conservation Areas at Risk' programme monitored by Historic England collects information from local authority surveys. In 2024, no conservation areas were recorded as being at risk in East Devon, an improvement from 2014, when 3 were considered to be at risk.

Reviewing Conservation Areas and designating new areas

2.109. Over time, circumstances can change within conservation areas, parts can deteriorate or be improved, so there is a need to review our conservation area boundaries and consider the designation of new areas. In many conservation areas, however, there may be no need to revise a character appraisal, and a review may confirm that the original appraisal is still relevant.

2.110. The majority (26) of East Devon's conservation areas were fully appraised in 1999 and were subject to a programme of interim review during 2008 – 9. The remaining conservation areas were designated or subject to a full appraisal more recently, between 2007 and 2011.

2.111. It is proposed that we establish and undertake a programme of review for our Conservation Areas, including management plans where needed. Local communities may become involved in reviewing their Conservation Areas, starting with a supervised pilot scheme.

Management plans and Article 4 directions

2.112. Management plans can be developed from up-to-date appraisals which identify threats and opportunities for the future of a Conservation Area, and set out priorities. Management proposals need to present clear design guidance based on the threats or vulnerabilities identified for an area and to be made available to residents and others involved in planning decisions.

2.113. An Article 4 direction may be applied to remove specific permitted development rights, where an accumulation of minor works through permitted development may undermine other positive work being carried in a conservation area. An example may be the removal of permitted development rights to alter windows or railings, in order to preserve the character of street facing facades.

2.114. However, the government advises that Local Authorities should consider making an article 4 direction only in exceptional circumstances where the exercise of permitted development rights would harm local amenity, the historic environment or the proper planning of the area.

Proposed Actions:

- *Deliver programme of Conservation Area reviews, including management plans*
  - *Identify priorities for review eg*
    Where a Neighbourhood Plan is proposed
    Where regeneration/other investment is required or proposed
    Where significant change is anticipated
- *Implement the process for communities to help deliver reviews, including training and monitoring*
- *Determine if any parts of the district merit designation as a Conservation Area by conducting a regular review*

Local distinctiveness promoting high quality new development

2.115. An understanding of heritage matters and applying sound vernacular design principles in new development can greatly assist in securing high quality development in the future. A tendency towards 'anywhere design' prompted by economic pressures and an agenda of urgent house building in recent years has sometimes undermined an area's local distinctiveness. However, it is possible to design new buildings in a locally distinctive way.

2.116. This may be critical when it involves or is part of the setting of a heritage asset, but even when it is not, an understanding of the local forms and styles of design used in the past can be of great value in building future developments.

2.117. It will often be the case that new buildings need not be an imitation of the past (a 'pastiche') and in some cases this could actually be undesirable. Buildings can be designed in a locally distinct and contemporary way with an understanding of what makes a place distinctive or a building architecturally significant, whilst being informed by local materials and traditions. With heritage acting as a stimulus for good design in an area, such new buildings can inspire new development in the future.

2.118. Proposals in the previous strategy for a new Design Guide for East Devon have not been carried forward into this updated version as new, national guidance is to be introduced. There is an opportunity for Neighbourhood Plans to incorporate the important themes of heritage and local distinctiveness, and where they do so, this will be a material consideration in planning decisions.

The conversion of existing buildings

2.119. The Local Plan and National Framework promote the use of existing buildings to accommodate new viable uses where appropriate and compatible with policy. The potential

benefits of this are explored in Theme C. The same principles of design using local traditions and materials can be applied.

Use of local materials

2.120. In the past, difficulty in transporting materials meant that many buildings were traditionally constructed using local materials. The variety of geology in East Devon has resulted in a broad range of materials being used, which are sometimes very localised so that the character and appearance of our settlements can vary greatly.

2.121. The Council encourages the use of traditional materials and methods in new and converted buildings as a means to help define and enhance the quality of the built environment. This can be promoted with examples of best practice, guidance on the use and sourcing of local material. Design guides and other advice can be made more widely available and accessible to developers, residents, local businesses and local communities in general.

Examples of local materials: ***Beer paving - local Beer stone and Beer workers cottages - local flint***





Development in rural areas

2.122. The development of agricultural buildings in remote areas, where the need for large scale storage facilities is increasing, needs to be handled sensitively due to possible visual impacts on an historic landscape. The re-use of redundant farm buildings also needs to consider and safeguard the existing character of the historic environment.

Examples of recent renovations







Use of Beer stone at St Giles and St Nicholas parish church, Sidmouth and the Parish Church of St Andrew, Colyton. Renovation with cob and thatch, Otterton

Proposed Actions:

Encourage development which enhances distinctiveness:

- *Provide links to further guidance which address the most common issues*
- *Provide information on the website to include sourcing of local materials, in particular a stone quarry guide*
- *Update and publish shopfront guides and any other relevant guides relating to heritage:*

  -Audit existing local heritage guidance
  -Identify areas/topics where new or updated guidance is required and which is most urgent
  -Undertake updates based on priority

Theme B Summary

- *Heritage assets are an irreplaceable resource which may deteriorate without positive management*
- *The Council has a range of legal and regulatory powers to manage heritage assets however there are limited resources to do so*
- *Listed buildings consent may be required for works to Listed Buildings and enforcement action may be taken where such a building has been allowed to deteriorate*
- *East Devon has 46 designated assets at risk recorded by Historic England (in 2018), mainly scheduled monuments*
- *Conservation Areas require review and management*
- *The development of a Local List may help in planning decisions*
- *Encouraging good design and the use of local materials helps distinctiveness*

Objectives and Actions

1. ***Positively manage the heritage assets of East Devon. Actions:***

Conservation Areas:

- *Implement the programme of Conservation Area review and encourage communities to help deliver reviews*
- *Determine if any parts of the district merit designation as a Conservation Area by conducting a regular review*

Heritage at Risk:

- *Provide information and a link to Historic England heritage assets at risk*
- *Liaise with partners and organisations to report on assets at risk*
- *Work with Historic England to review potential assets at risk and discuss strategies for dealing with them*

Local list:

- *Publicise the Local List Guide for East Devon,*
- *Receive and consider local list submissions*

2. ***Encourage development which enhances distinctiveness. Actions:***

- *Provide links to further guidance which address the most common issues, on website*
- *Provide information on the website to include sourcing of local materials*
- *Update and publish shopfront and any other relevant guides*

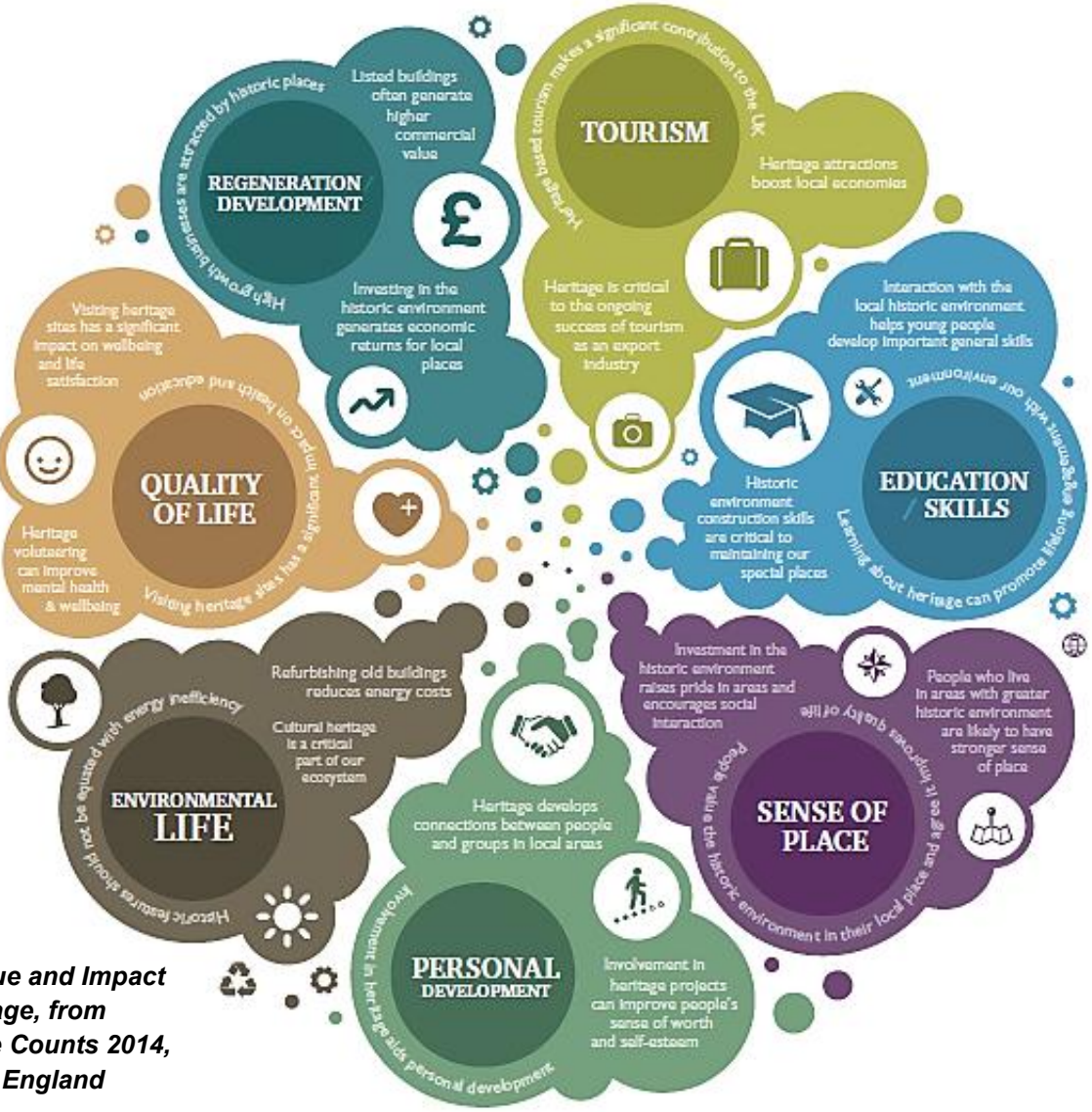
Theme C: Enhancing and benefiting from our heritage

The value and impact of heritage

2.123. The historic environment is an important feature of sustainable development and can provide social, economic and environmental benefits, which are often interlinked. Research by Historic England has identified many of these potential benefits, which are outlined below.

2.124. At a time of economies within the public sector, understanding the value and impact of our heritage is especially important. Working with partners and communities, we can help to enhance our heritage and make the most of these benefits. The involvement of local communities is vital to identifying and capitalizing on what is important for neighbourhoods and local areas.

2.125. Much of this theme looks to the future and some of the more proactive steps that can be taken identifying the need for, and opportunities gained from much greater partnership working. Being aware of and co-ordinating with other strategies and policies across the District encourages a coherent approach to make the most of our heritage assets.



The Value and Impact of Heritage, from Heritage Counts 2014, Historic England

Social, economic and environmental benefits

Social benefits

2.126. The heritage of a place can play a central role in local identity and distinctiveness, giving a sense of pride and belonging for local people and strengthening a community.

2.127. Further, the involvement of a community in heritage issues has been shown to improve well-being and quality of life. Heritage counts 2024[29] finds that learning about heritage promotes lifelong engagement, whilst both visiting and volunteering in heritage brings happiness and can improve both physical and mental health:

> ***"In a survey, 93% of residents said that local heritage has an impact on their quality of life, and 80% think local heritage makes the area a better place to live"***

Economic benefits

2.128. The economy, regeneration and tourism are often fundamentally linked with the historic environment and the sectors can work together to enhance its benefits. Heritage Counts (2024) describes the relationship between our national economy and heritage and how this market is experiencing strong growth, which is expected to continue.

2.129. Using the latest available national statistics (2022), England's heritage sector is estimated to have contributed £44.9 billion in Gross Value Added (GVA) to the UK economy in 2022 and supported the employment of over 523,000 workers (CEBR, 2024).

2.130. Findings from Heritage Counts 2024 also reveal that businesses are attracted by historic places, with the owners of creative enterprises especially attracted to historic buildings, and that listed buildings generate higher commercial returns. The results of surveys illustrate that investment in the historic environment generates growth and that there are economic benefits from the regeneration of historic places.



2.131. 'Heritage indicators' have been collected in the Southwest, mostly since 2002, indicating medium term trends which can help organisations to understand what is working and to set priorities for the future.

Heritage and tourism in East Devon

2.132. In East Devon, tourism and the visitor economy are important contributors to the vitality and vibrancy of the district's coastal and market towns and our rural communities. In turn, the traditional buildings of East Devon form a vital part the tourist appeal.

[29] Heritage Counts is produced by Historic England on behalf of the Historic Environment Forum (HEF) Heritage Counts: Heritage Sector Trends, Insights and Data | Historic England

2.133. The Local Plan identifies the towns and villages with built up area boundaries as the best locations for new tourist accommodation. 'Sustainable tourism' can be encouraged including quiet countryside pursuits, and local products and services that do not compromise the historic landscape and environment.

2.134. It is estimated that in 2015 tourism contributed £252.5 million to the East Devon local economy, 3.5 million more than the previous year, indicating a positive trend. Whilst more recent East Devon figures are not available, national trends would suggest that this positive trend has continued, with 7 out of 10 of the most popular paid visitor attractions in England being heritage attractions, 35% of UK citizens holiday destinations being influenced by the presence of cultural heritage and spending per trip on day trips now almost doubling pre-pandemic levels.

2.135. Research into the economic impact of the Jurassic Coast World Heritage Site Designation in 2022 found that World Heritage Status of this coastline influences around £100m of economic activity each year[30].

Environmental benefits and the 'Climate Emergency'

2.136. Heritage assets can provide inspiration for the design of new development both within Conservation Areas and in new developments. This may help to reinforce local distinctiveness, including the use of local materials and encourage high quality, imaginative design.

2.137. The UK Government have committed to a target to reduce greenhouse gasses be 'Net Zero' by 2050. Following this, East Devon District Council declared a climate emergency, aiming to be carbon neutral by 2040.

2.138. In 2024 the Office of National Statistics reported that, despite reductions, buildings remain the UK's second highest greenhouse gas emitting sector whilst in occupation, largely from the use of natural gas and other fuels. If targets are to be met then not only do we need to *adapt* our buildings to be resilient to events such as flooding and higher temperatures, but to *'mitigate'* the effects, by reducing carbon emissions during the lifetime of a building. It is also important to note that the statistics do not account for the 'embodied carbon' that is released during a building's lifetime, particularly by the materials, transport and processes needed for construction and demolition. Indeed the Royal Institute of Chartered Surveyors estimates that more than half of the 'lifecycle carbon' from a typical residential dwelling is emitted before it is occupied.

2.139. Finding ways of retaining our existing housing stock and other premises, including those of historic importance, is therefore vital to reduce the substantial amount of carbon needed to produce new buildings. Historic England[31] considers that *"*most traditional buildings… have an innate ability to offer greater resilience to our changing climate than their modern counterparts" where they are well maintained and adequately heated and ventilated.

2.140. Traditional materials used such as clay and lime are breathable, absorbing moisture during wet weather and releasing it when the sun and wind dry a building. Energy efficiency

[30] See Jurassic coast website 'economic benefits' for further details
[31] Historic England (2017), Energy Efficiency and Historic Buildings on the Historic England website

measures that are not breathable can affect this balance, so care is needed. Adapting an historic building for climate change needs an even more sensitive approach to ensure protection of the heritage 'significance' that makes the building important.

2.141. Despite these challenges, the organisation believes it is possible to improve the energy efficiency of all buildings without unacceptable harm to their significance, and has recently published Advice Note (HEAN 18): Adapting Historic Buildings for Energy and Carbon Efficiency. The guide sets out approaches, clarifies policy and details the permissions that may be needed. It also offers typical ways of adapting historic buildings for climate change that may be acceptable, whilst prioritising interventions and minimising harm. It recognises that there is generally a balance to be found between protecting heritage assets and adapting them for the future, with adaptions not causing unacceptable harm. Each case is different, for example, there may be works to a listed building that are so harmful to their significance that they should not be allowed.

The Whole Building Approach

2.142. As each building performs differently, the 'whole building' approach is described in the guide. It is an holistic method which explores a building in its context to find a range of 'balanced and effective solutions' that in summary:

- save energy and carbon based on an understanding of the building and how it performs,
- sustain the asset's heritage significance whilst avoiding or minimising harm,
- provide a safe, healthy and comfortable indoor environment for occupiers

Some useful principles on adaptations to note from the guide, are:

- **Low risk (often low cost) work should be started first -** before more potentially harmful work. Low impact interventions on significance, such as adding thermostat controls or insulating an unused chimney flue, reduce energy loss at little cost.

- **Start small scale -** and continue in stages and make changes that are reversible where possible.

- **Tried and tested** repairs and improvements are preferable.

- **Energy efficiency improvements can be aligned with other works** - such as draft proofing whilst carrying out repairs to windows and doors.

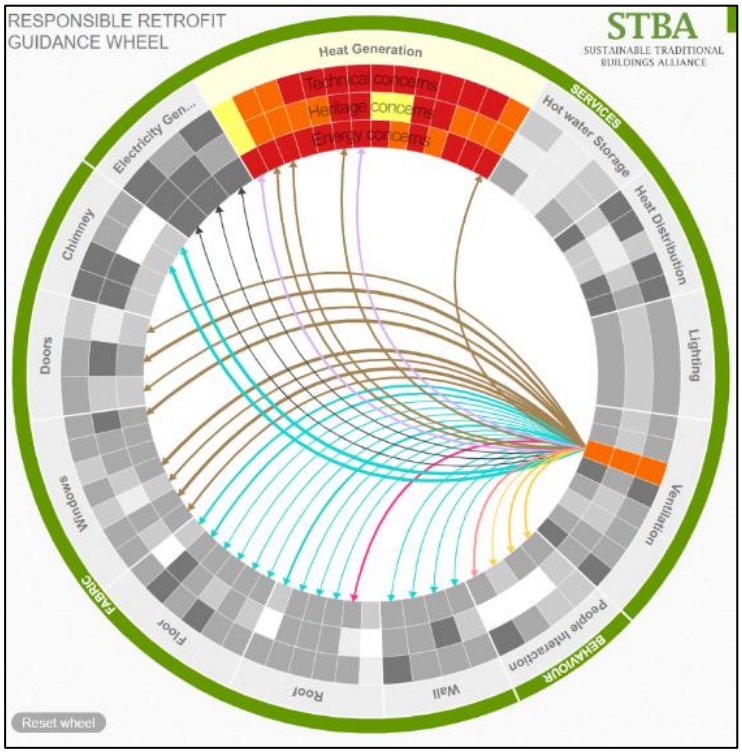
- **Lifespan should be considered -** for example, well maintained historic windows may survive for over 100 years, in comparison with PVCu windows for less than 25 years.

- **Maintenance and repair is essential, reducing damp -** there are many small jobs that can be done every year to keep properties in good condition, including:
  - cleaning gutters and other rainwater goods
  - removing weeds from masonry
  - retouching paintwork on doors and windows

These can help to prevent damage, maintain value and save costs in the long term. Some tasks could be organised as a community project, for example within a conservation area.

- **Checks can be outlined -** using the whole house approach to ensure adequate ventilation to prevent damp. However, a careful balance must be struck as excessive draughts can waste heat.

2.143. There are some common retrofit mistakes to be aware of:



2.144. ***The Responsible Retrofit Guidance wheel (left)*** by the Sustainable Traditional Buildings Alliance is an excellent free interactive tool.

2.145. It depicts more than 50 measures that can be used for the retrofitting or refurbishing of traditional buildings and highlights the possible risks associated with those measures.

2.146. Each measure has a number of advantages and concerns, categorised into technical, heritage and energy. For example, installing photovoltaics indicates 3 heritage concerns, including 'loss of original external detail' – a 'high' concern and 'planning consent within a conservation area - a 'major' concern.

Common interventions outlined in the HEAN 18 guide

2.147. Although each building must be assessed on a case-by-case basis, the document provides useful guidance on works that are generally acceptable, and for which works listed building consent may be required.

2.148. Details are given for works relating to windows, doors, insulation, mechanical ventilation and heat recovery systems, heating systems and heat pumps, photovoltaic and solar thermal panels, solar slates, wind power and the addition of electric vehicle charging points.

2.149. For each measure the guide indicates what is likely to be acceptable, for example:

2.150. **Windows:**

- Draft-proofing: almost always acceptable and unlikely to need listed building consent (LBC)
- The installation of secondary glazing or slim profile double glazing within historic frames: both are generally acceptable, with the latter likely to need LBC

- The sensitive replacement of windows which do not contribute to a building's special interest: this may be acceptable but is likely to need LBC.

2.151. **Insulation:**
Insulation between or under floors and in lofts is also generally acceptable, with internal or within external wall insulation described as acceptable in some cases. Whilst external wall insulation is unlikely to be acceptable, the reinstatement of an historic render finish is almost always desirable.

2.152. **Low carbon heating alternatives:**
Such as heat pumps may be acceptable with careful siting, design and screening, as may solar panels if hidden from view, or incongruous. This includes careful consideration of their potential impact on significant views of the building, and where harm is avoided to the building's special interest.

2.153. **Other external works:**
May be suitable, to help buildings adapt to changing weather patterns, subject to permissions. Acceptable examples given in the guide are external awnings, shutters or blinds to reduce overheating, and careful improvements to rainwater goods to take increased rainfall.

Useful links:
HEAN 18 - https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18
HE's 'Energy Efficiency and Retrofit' webpages, which include a series of more detailed advice notes - https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings
HE's 'Your Home' webpages provide more general advice for homeowners - https://historicengland.org.uk/advice/your-home
The Responsible Retrofit Guidance wheel - https://www.responsible-retrofit.org/greenwheel

Enhancing our heritage assets

The impact and influence of linked policy

2.154. It is important to consider a range of policies within the Council and those of other organisations within or neighbouring the District, which have an impact on this strategy, so that a co-ordinated approach can be made. In addition to policies to protect, conserve and enhance the historic environment and to recognise the importance of local distinctiveness in design, the (adopted and) emerging Local Plan(s) have set out policies for the economy, tourism, town centres, villages and neighbourhood planning which may compliment and impact on the Heritage Strategy.

2.155. Wider objectives and priorities in the local plan include:

- Promoting East Devon to create value and enjoyment of the area
- Actively seeking external funding and exploring alternative delivery mechanisms for a series of priority regeneration and development projects
- Creating opportunities through partnership and the planning process
- Strategically working with neighbouring authorities and other agencies, and
- Promoting and improving our town centres and high streets to encourage community identity, local services, more trade and stronger businesses

Town and village centres

2.156. Local Plan policies identify Town Centre Areas and Primary Shopping Areas which seek to ensure vitality and economic viability for town centres (including Colyton and the village of Beer) and encourage the active use of upper floors.

2.157. The Local Plan also includes several policies to encourage provision of new facilities and services and resist the loss of existing ones, especially where they are the last remaining facility or service of a type in a town or village centre. There are differences in the role and scale of centres, for example many towns include a large rural hinterland, many village centres support local everyday, basic needs whilst some, like Beer, are also a visitor and tourist centre with specialist holiday accommodation.

Design and the built heritage

2.158. The Local Plan stresses the importance of promoting high quality locally distinctive design standards and encourages the use of traditional materials and methods in buildings. This can inform and be integral to the work of designers, using local materials in sympathetic and traditional styles and forms. The previous Strategy identified the production of an East Devon Design Guide (Local Plan Supplementary Planning Document) as an action, however this is unlikely to be prioritised now as guidance is to be produced nationally. Instead, there is an opportunity to reinstate a 'Member Champion for Building Design and Heritage' whose role would be to promote all aspects of the historic environment in East Devon. The role described by Historic England[32] includes:

- generating enthusiasm for and awareness of the importance of the local historic environment
- helping to ensure that commitment to the proper care of the historic environment is embedded in all relevant activities and plans of the local authority, and
- Influencing and communicating with others to ensure benefits for the historic environment.

Tourism

2.159. The Local Plan encourages tourism development, particularly where it enhances and capitalises on the geology, wildlife, coastline, countryside, historic environment and other assets that are unique to the District.

2.160. The economic policies of the Local Plan commit to supporting and facilitating high quality tourism and sustainable growth. Tourism can help to initiate the regeneration of settlements and the marketing of East Devon's assets through information technology is encouraged.

Local Plan Policy seeks to maintain and enhance the district's visitor appeal "by working in partnership with East Devon's tourism industry to promote the District as an all year round destination"

[32] Historic England (2018) 'What is a Heritage Champion' webpage extract, summarised

Working with local communities



2.161. Local communities are a valuable resource and we are fortunate in East Devon to have many specialist groups with expertise and knowledge of our local heritage. Residents, business owners and other interested parties may be involved in heritage issues through their parish councils, historic societies or neighbourhood planning groups.

2.162. It is beneficial for communities to help in assessing what makes our towns, villages and rural areas special. It is often a place's heritage that makes it locally distinctive and unique, which can give people a greater sense of identity and pride in their place.

2.163. During recent years of economic constraints within local authorities, different approaches towards conservation management have been emerging, with local communities becoming more involved in the appraisal of their Conservation Areas, local listing and monitoring buildings at risk. Nationally, local groups have, for example, helped to prepare character appraisals and management plans for Conservation Areas.

2.164. In East Devon, communities have taken on ownership and accountability of their area through neighbourhood plans, with volunteers driving the process forward. There is potential to develop this further to help manage heritage assets in the future, and this is outlined for particular tasks in Theme B.

2.165. Community involvement in programmes will help to increase the skills, knowledge and experience to help conserve our heritage, whilst the Council can in turn strengthen links with local communities, demonstrate public accountability and encourage innovative ways of working.

2.166. There are also opportunities for people to work on specific projects to protect and enhance heritage assets in their area, in partnership with specialist organisations and groups. Under careful supervision and guidance, individuals may get involved in many ways and with a variety of skills such as 'ground truthing' (looking for structures below the ground detected by lidar surveys), vegetation removal, mapping exercises and researching historic documents.

Example: Dunkeswell Abbey (2017-19)

2.167. This Grade I listed building and Scheduled Monument is a ruin and a category 'A' building at risk. A partnership involving Devon County Council, Historic England, The Blackdown Hills National Landscape, Blackdown Hills Trust, the Abbey Church Trust and the local community will make a bid for funding from the Heritage Lottery "sharing heritage" fund in 2018-19. The partnership hope to work on many activities, including the investigation of a possible historic route for monks from Forde Abbey to Dunkeswell as a long distance walk, activities with primary schools, an earthworks survey with further ground truthing, vegetation removal from the site and the recording of Abbey walls.



Dunkeswell Abbey with the Church of Holy Trinity, Dunkeswell, in the background

Example: Woodbury 'Castle' Restoration Project (2017-18)

2.168. This is a scheduled monument which is also on the 'at risk' register. It is an Iron Age hillfort suffering from erosion, located within the Pebble Bed Heaths of Woodbury Common. A project has been progressed in partnership with Clinton Devon Estates, the East Devon National Landscape, Devon County Council, the Devon Archaeology Society, the Pebble Bed Heaths Conservation Trust and Friends of the Commons volunteers. Work has included clearing vegetation, providing new access steps, stabilising one of the ramparts and establishing new vegetation for the long term protection of its banks.

2.169. The project has been celebrated through guided walks and involvement of the local primary school, learning about the monument and sowing grass seed on the ramparts to help protect them for the future. The partnership hopes to establish a volunteer archaeological monitoring scheme for ongoing conservation work.



Woodbury Castle restoration project 2017- 2018, Woodbury Common.

Neighbourhood Planning

2.170. The Localism Act (2011) introduced Neighbourhood Planning, which gave local communities greater powers to make decisions about their area through a Neighbourhood Plan. There is much guidance available through Historic England on how to gather information on, and capture heritage within a plan. Both the Council's Planning Department and Historic England can advise on the stages of development of a neighbourhood plan.

2.171. At the time of writing, 42 neighbourhood areas are designated in East Devon, which represent a large number of plans for a non - unitary Local Authority nationally. Twenty seven of these have been 'made' (legally approved).

2.172. Within neighbourhood plans, policies can be developed relating to heritage. Made neighbourhood plans for Lympstone and Chardstock, for example, have policies relating to new development and their setting in relation to heritage issues. It is important, however, for any evidence provided to be proportionate to the scale of the neighbourhood plan.

2.173. Neighbourhood Plans can also include policies which identify and/or give additional protection to non-designated heritage assets. Recognising the importance of local community knowledge, several of the actions in this Strategy commit to producing and helping to implement guidance at a local level- Parish Councils and Neighbourhood Plan groups are ideally placed to identify local heritage assets and ensure that their importance is recognised.

2.174. Some Neighbourhood Plans will also allocate sites for development and it is essential that local heritage assets, and their setting, are properly taken into account in this process. Early conversations with the Council's Neighbourhood Planning Officer and Historic England can help to raise the awareness of sensitivities regarding heritage assets and guidance will be produced to assist in identifying, and taking account of, the significance of heritage assets when allocating sites for housing development.

Proposed Action:

- *Explore reintroducing a Member Champion for Building Design and Heritage*
- *Continue to offer support to neighbourhood planning groups in identifying heritage assests, assessing significance and writing policies*
- *Produce a template to guide neighbourhood planning groups in site assessments to ensure that heritage matters are appropriately considered*

Training and capacity building

2.175. There are many sources of information available and training for groups and individuals to participate in managing their local heritage. Publications such as 'Knowing your place', 'Placecheck' and 'Understanding place' provide useful guidance from Historic England, whilst the Oxford Toolkit is a recommended guide on how to undertake a conservation area character appraisal. A Smartphone App 'Rate My View' is currently available for communities to record local points of interest. Devon County Council's Historic Environment Viewer and Heritage Gateway provide much information.

2.176. A resource is also available through the Devon Rural Archive (Significance of Place)[33] website for communities engaged in Neighbourhood Plans, Conservation Area Appraisals and Management plans, providing guidance and workshops on heritage related matters.

[33] http://www.devonruralarchive.com/Significance-of-Place.html

2.177. Capacity building, where residents' knowledge and skills in heritage issues are developed through workshops, which may include their training of other residents, can be developed within communities creating a valuable resource of knowledge and expertise.

Proposed Action:

- *Facilitate, or advise on, a range of training opportunities, especially for neighbourhood planning and other community groups with an interest in heritage*

Working in partnership

2.178. Working in partnership and co-operating with other public bodies, organisations and agencies within and adjacent to the district means that approaches and work programmes can be co-ordinated where possible, and benefits can be maximised. Partners within the economic and tourism sector, for example, combine to regenerate areas and draw visitors and businesses to our towns and seaside resorts.

2.179. In the environmental sector partnerships such as those with the two National Landscapes help us to understand, protect and enhance our outstanding landscapes. For example, the East Devon National Landscape has produced an action plan based on Historic Landscape Characterisation carried out across East Devon.

2.180. The District Council also works in partnership with Devon County Council to fulfil its obligations to have access to Historic Environmental Records and specialist archaeological and non-designated heritage asset planning advice.

2.181. Corporate working between Council departments including economic development, environmental health, housing and planning are also important where possible, to help work towards common objectives and overarching priorities. Working with partners and other departments within the Council can help to identify where joint projects may be progressed or bids for funding may be pursued, for example in our historic town centres or areas targeted for regeneration.

Proposed Actions:

- *Increase attendance at meetings or events with partner organisations to work towards common goals*
- *Create working group within the Council to work towards joint objectives and coordinate projects and programmes*
- *Work with partners and other departments to identify joint projects and sources of funding*

Regeneration

2.182. Heritage can provide the impetus for regeneration projects, especially where redundant historic Brownfield sites have proved not viable to bring back into use by a private owner due to the additional costs of specialist work. Empty or derelict buildings can have a

negative effect on an area. Research has demonstrated the added value of bringing historic buildings into a good state of repair and into use, restoring confidence and attracting further investment. Solutions may need to be creative or innovative in terms of partnerships and sources of funding in order to tackle difficult sites.

Economic Development department

2.183. Working with this department we can help to identify heritage-led regeneration projects that will have social, economic and environmental benefits through, for example, improving tourist and town centre sites that are run down. Heritage has an important role to play in place-making and this may be part of a much wider programme working with other partners in the public and private sector.

Environmental Health department and private sector housing

2.184. Working with our private sector housing team can help to identify joint projects where heritage assets are in a poor state of repair. Owners may be encouraged to improve their properties through grant funding, loans or advice, or properties may be subject to enforcement action (as described in Theme B).

2.185. Listed buildings may become neglected and empty due to the cost of repairs. Owners can be encouraged to bring properties into use through empty homes loans at a beneficial rate, or where the owner may not be able to get a loan otherwise.

2.186. Private sector house renovation schemes can be a vital part of a wider programme of regeneration, especially in our town centres. For example, funding may be available for 'Living over the Shops' schemes where empty residential or commercial space is converted into living accommodation in our high streets and town centres. Not only can such schemes improve the appearance of an area, encouraging owners and businesses to invest, but can house and bring in more residents, who are likely to shop locally. Many sustainable outcomes can be achieved through this. For example, with less car use carbon emissions are reduced bringing environmental benefits, health may be improved as walking is encouraged to local shops, bringing social benefits, whilst retailers may have increased local trade bringing benefits to the local economy.

Example: Honiton High Street

2.187. A group of flats above commercial buildings within the conservation area were recently upgraded with the Council working with the fire service to improve safety issues, which will help to keep the buildings occupied and encourage the benefits explored above.

Area Regeneration

2.188. The historic environment can be a powerful tool for delivering regeneration and providing spaces for local businesses, community facilities and other activities. Co-ordinated programmes for improvement can influence a much wider area as existing property owners tend to spend more on maintenance, whilst new investors move in.



Example: Otter Mill, Switchgear factory (left) and site (right), Ottery St Mary in 2013 and 2022

2.189. The regeneration of the listed Town Mill, Mill House and Corn Mill buildings have greatly improved the sustainability of the area. This Brownfield site was neglected for many years and was an eyesore at the entrance to the town centre and Conservation Area. The provision of housing has helped to sustain local shops and add to town centre vitality. Its proximity to schools, shops and other major services encourages walking and cycling, contributing to the health and wellbeing of the community whilst reducing carbon emissions. The restoration of these Listed Buildings hasl improved the local environment and helped the town to become a more attractive location for local businesses and visitors.

Example: Seaton seafront

2.190. The World Heritage Coast and an adjacent conservation area combine to make a valuable resource for retail, tourism and day visitors. Seaton town centre and seafront have been targeted for improvement over many years, including a partnership between Devon County Council and the District Council to improve the appearance of the town centre and raise the quality of shop front development. Practice notes were adopted as supplementary planning guidance in 2002 and have been used to determine planning applications in the Conservation Area.

2.191. The renovation of individual sites which may have been an eyesore can also make a huge impact on an area, its heritage, sustainability and local economy, by encouraging investment in a location previously unattractive and subject to uncertainty.




Seaton conservation area shop fronts and adjacent seafront

Town centres and high streets

2.192. The use of town centres is important for local communities - residents, businesses, and retailers as well as for visitors, providing a focus for social and communal activities. Historic buildings, streets and spaces can provide an attractive setting and a local identity to these places, contributing to their overall success. Historic England reports[34] on how the role of town centres and high streets are changing due to economic, social, demographic and technological trends, which in turn have often had an effect on the local historic character.

2.193. Research has revealed a decline in the retail performance in town centres, along with the shift of large retailers away from town centres during the last 20 years. Replacing this is a trend towards leisure, food and drink, with a focus on quality and experience, and the growth of many restaurant groups and fashion retailers. Meanwhile, banks and post offices are closing leaving many prominent and listed buildings with the need for a new use. Emerging successful independent retailers are important for the vitality of town centres.

2.194. During the last decade, limited public sector funding combined with a lack of economic viability has been a consistent trend. With a lack of investment, the historic environment will suffer along with economic vitality, so the sensitive development of new shops is very important. Many smaller scale solutions are emerging, often in smaller centres where there is an understanding of the need to enhance local distinctiveness and a willingness to adapt to new challenges.

2.195. The publication ‘The Changing Face of the High Street’ (2013) looks at how local councils, developers and partnerships have sought to improve the vitality of these centres and the public realm by embracing their local heritage.

2.196. Cost effective ways of improving town centres include marketing and branding exercises, ‘way-finding’ and signage schemes, pop up shops, events and street markets. Meanwhile, joint initiatives involving empty properties, including ‘Living Over The Shop’ schemes or shop front improvement can help to invigorate run down centres.

[34]Historic England (2013) The Changing Face of the High Street: Decline and Revival

Branding and Competitiveness

2.197. Place branding can help to build the reputation of a place and improve the perception of residents, businesses, investors, workers and visitors. The role of heritage is important in building a brand that reflects local identity and a sense of place and it is estimated that the role of heritage in place making and place branding will grow. Place branding studies[35] have revealed that the main resources are heritage assets which help to differentiate places, provide an authenticity which has a wide appeal and can extend visitors 'dwell time'.

The historic town centres of East Devon

2.198. In East Devon, the town Centres of Ottery St Mary, Honiton, Budleigh Salterton, Axminster and Seaton are mainly or largely within a conservation area, making these attractive places for visitors. Some, such as Budleigh Salterton, are preserved more than others, while others such as Ottery St Mary are subject to more growth giving them very different identities and priorities for their future.

More information and maps on each historic town centre are in provided Appendix 1



Examples of Historic town centres: Honiton, Seaton and Axminster

[35] Historic England (2017), Heritage Counts 2024

Sources of Funding

2.199. The Heritage Funding Directory currently provides comprehensive details of a range of support that may be available for heritage interests through grants, loans, awards, education and training, and “in kind” resources. These are from central government, local authorities, agencies, EU and non-governmental bodies, trusts and corporate or private interests. Some of these organisations and types of funding are outlined below.

Historic England

2.200. The organisation provides grants for heritage assets at risk, though due to high demand, limited qualifying projects can be funded. A condition may be applied that offers public access to a grant aided site for a number of years. Repairs grants may be offered, mainly for urgent repairs to prevent loss or damage to important architectural, historic, landscape and archaeological features.

2.201. Grants for the repair and conservation of War Memorials may be available through the War Memorials Trust, whilst Historic England may offer funding to improve the management of field monuments through agreements with landowners or tenants.

2.202. The ‘heritage protection commission’s programme’ may grant aid projects to develop innovative ways to protect the environment from harm and enrich skills and expertise to help care for it. The ‘capacity building programme’ provides funding for projects which promote the conservation, understanding and enjoyment of the historic environment.

Heritage Lottery Fund

2.203. A share of funds raised through the National Lottery is available through the National Heritage Memorial fund (HLF) for a wide variety of heritage themed projects, including training in heritage skills and the restoration of historic buildings and monuments.

Local Authority

2.204. The Council may have resources available for empty homes through loans to bring them into repair and back into use.

Central Government

2.205. Energy schemes administered by the government are available from time to time with loans towards items such as draft proofing or insulating a property.

DEFRA[36]

2.206. The Blackdown Hills and East Devon National Landscapes have secured funding from this organisation through the Sustainable Development Fund. This is aimed at supporting projects that bring social, environmental or economic benefits to the areas and demonstrate innovation and good practice, including training communities in heritage.

[36] Department for Environment, Food and Rural Affairs

Theme C Summary

- *The interlinked benefits of heritage can be social, economic and environmental*
- *Climate change mitigation measures require particular care and sensitivity*
- *Tourism and visitors to heritage sites contribute to our economy*
- *Co-ordinated policies can help to enhance our heritage*
- *Communities can be involved in heritage in many beneficial ways*
- *Partnerships can help effective regeneration*
- *Distinctive historic town centres attract visitors and business*
- *There are many sources of funding, detailed in the Heritage Funding Directory, for heritage related projects*

Objectives and actions

1 ***Work with partners and corporately to identify joint projects and maximise funding. Actions:***

- *Explore reintroducing a Member Champion role for Building Design and Heritage*
- *Increase attendance at meetings or events with partner organisations*
- *Create a working group within the Council to work towards joint objectives and co-ordinate projects and programmes*
- *Work with partners and other departments to identify joint projects and sources of funding*

2 ***Work with communities. Actions:***

- *Facilitate, or advise on, training opportunities, especially for community and neighbourhood planning groups with an interest in heritage*
- *Continue to support neighbourhood planning groups in identifying heritage assests, assessing significance and writing policies*
- *Produce a template to guide neighbourhood planning groups in site*

Section 3: Implementation



Colyton Conservation Area, from the Grade I listed Parish Church of St Andrew

Introduction

3.1. The strategy is proposed to cover an 18 year period (2024 – 2042) to run alongside the East Devon Local Plan 2020 – 2042. An action plan is provided for implementation of the strategy.

3.2. Through the three themes of the strategy, objectives have been identified and proposed actions to meet those objectives are highlighted in red. The themes, objectives and actions form the basis of the action plan, and each theme is colour coded in yellow, blue or green. For each action an estimate is made of the resources needed, its timing and its priority (whether it is a statutory duty).

3.3. As the second heritage strategy for East Devon, many of the actions relate to delivering the systems and programmes already established under the original strategy. A review of the strategy is proposed after the first five years. Resources and benefits are also outlined below.

Resources

3.4. The actions recommended have been carefully considered and our statutory duties are the main priority. Other actions are expected to produce significant beneficial outcomes in the future, whilst minimising resources in the long term. Projects and programmes will be suitably progressed according to available resources.

3.5. In order to minimise the demand on resources, the Council has identified some specific tasks that staff within the planning policy section may perform to help manage our heritage assets, with a ‘light touch’ sign-off by conservation officers.

3.6. The participation of the community in helping to deliver parts of the strategy will also provide a valuable resource, contributing to its progress. The impetus of local volunteers in Neighbourhood Planning and specialist historic interest groups may be captured and taken forward for this strategy.

3.7. The investment of staff time facilitating and advising on training will be needed especially in the early stages, but as the programme develops, capacity should build within local communities to help manage their own assets. Training is currently available for some projects and the Council is aiming to secure grant funding to support further work.

3.8. Cost effective ways of improving knowledge and engagement include circulation of the strategy in an accessible format and the provision of a more comprehensive website resource. New web pages can provide a base for the exchange of information and links to other organisations, guides and training in heritage issues.

3.9. An occasional heritage themed event at the Council offices and officer presence at other events are achievable ways of networking and promoting the heritage of East Devon. Local and regional organisations have offered their support for the strategy and these partnerships can be further developed to pool resources and deliver some common objectives in a cost effective way.

Benefits

3.10. The benefits that can be sustained or enhanced through delivery of the strategy are wide ranging, and are explored through the three themes.

3.11. Theme A aims to improve knowledge and understanding of the heritage of East Devon by making information accessible to a wide audience and by promoting its value. Benefits include increased awareness and appreciation of our heritage, active participation in heritage programmes and a feeling of identity and pride in local areas.

3.12. Theme B explores how we can manage our heritage assets through Conservation Area review, monitoring buildings and risk and local listing, all of which help to conserve our heritage. The strategy aims to increase community involvement in programmes, building on the strong neighbourhood planning groups and historic societies in East Devon. This will in turn increase the range of skills, knowledge and experience to help conserve our heritage.

3.13. Historic England reports on growing evidence of a positive relationship between heritage participation, wellbeing and quality of life[37]. This includes findings that both visiting and volunteering in heritage brings happiness. Heritage participation helps to develop connections between people and groups in local areas, whilst building skills and personal development. All of these can contribute to improved mental and physical health.

3.14. For organisations, programmes involving the community encourage innovative ways of working, demonstrate public accountability and strengthen links with the community.

3.15. Theme C looks at how heritage can boost the economy through tourism and the attraction of our historic town centres, both directly, through the employment of specialised craftsmen and use of local materials, and indirectly through increased appeal for tourists, businesses and residents.

3.16. Visitors to heritage-related tourism generate considerable income for the local economy, helping local enterprise. Further, heritage often plays a central role in the regeneration of towns, with both people and businesses being attracted to characterful places.

3.17. Environmentally, the positive conservation of our heritage assets helps to reinforce local distinctiveness and encourage high quality design.

Monitoring

3.18. The monitoring of actions will be developed further where measurable targets are possible. Some indicators are already included in the local plan and others are collected by Historic England. In the long term the impact of projects delivered through the strategy can be assessed to inform the future planning of programmes.

3.19. Benefits may be measured through a range of surveys, questionnaires and interviews. The impact of community programmes may also be assessed using a matrix to explore the value of what has changed, and to what extent, against other programmes.

[37] Historic England (2024), Heritage counts 2024

Action Plan 2024 – 2042

Timescales: S = Short term 2024 – 2027 M = Medium term 2028 – 2035 L = Long term 2036 – 2042

Objectives Theme A	Actions and tasks	Stat. duty	Indicative resources	Delivery: Staff and Partners	Timescale S	M	L	Notes	Indicative monitoring
Enhance understanding of heritage assets and their significance	Provide information and Guidance through an updated Heritage Strategy		Moderate staff resources	Policy team	X				
	Provide links to further guidance through the Council's website		Minimal staff resources	Policy and conservation staff	X	X		Ongoing	
	Continue to develop and improve web pages on the Council's website for the provision and exchange of information on heritage issues relevant to East Devon		Moderate staff resources with ongoing updates	Regular updates from policy and conservation staff. Links to, and input from partners	X	X		Ongoing with regular updates	Survey on use of website and other programmes
Widen knowledge of the heritage of East Devon and its assets	Encourage local groups / museums to engage with local schools		Moderate staff resources	Policy staff to circulate information		X			
	Promote strategy and web pages including use of social media		Moderate staff resources	East Devon staff, press office and Members	X	X		Ongoing	No. of local groups / partners engaged
Celebrate and promote the heritage of East Devon (raise the profile)	Support events such as the annual Heritage Open Days and the East Devon National Landscape Heritage Conference. Promote heritage strategy and website at heritage events.		Moderate staff resources	Staff and Lead Councillor for Heritage presence at heritage events	X	X	X	Ongoing	Number of events attended; outcomes recorded
	Host an occasional heritage themed event / workshop for members and community representatives- this may be provided as part of wider Neighbourhood Planning events		Use of Council chamber and catering	East Devon staff, Members and Community Officer. Help from partner organisations	X	X			Event feedback survey

Objectives Theme B	Actions and tasks	Stat. duty	Indicative resources	Delivery: Staff and Partners	Timescale S	M	L	Notes	Indicative monitoring
Positively manage the heritage assets of East Devon:	**Undertake a programme of Conservation Area review:**	**Yes**							
	Deliver programme of Conservation Area review and management plans.		Staff resources, policy team.	Conservation team	X			Ongoing	Completion of guidance
Conservation Areas	Implement the process for communities to help deliver reviews, including training and monitoring.		Staff resources, policy team	Policy/NP officer, in consultation with conservation team and local amenity group.	X	X			Process developed
	Implement programme to prioritise reviews over 18 years. Consider priorities in Conservation Areas within towns and other Settlement Boundaries most subject to change and those with active Neighbourhood Planning and Historic Interest Groups. Undertake the programme of reviews, to include full and interim reviews and other methods where appropriate, some involving neighbourhood planning and local history / amenity groups. Prepare appraisals and management plans.		Staff resources, policy and conservation team. Much input from community and staff initially	Programme managed by policy staff working with communities with input and sign-off by conservation team. Assistance from partners, especially if able to secure funding for training.	X	X		Long term protection of assets and benefits for the community.	Numbers of reviews and management plans. Other Indicators developed for pilot scheme
Objectives Theme B	**Actions and tasks**	**Stat. duty**	**Indicative resources**	**Delivery: Staff and Partners**	**Timescale S**	**M**	**L**	**Notes**	**Indicative monitoring**

Conservation Areas	**Determine if any parts of the district merit designation as a Conservation Area and if so designate new areas:**	**Yes**							
	Conduct regular review of areas that may merit designation		Staff resources	Annual review by staff	X	X	X		
Heritage at Risk	Provide information and a link to the Historic England register of heritage assets at risk on the Council webpage	**Yes**	Minimal staff input complete and update	Information supplied by Historic England	X	X		Minimal input with annual updates	
	Liaise with partners and organisations including Building Control, Estate Agents and communities to enable reporting on assets at risk where possible and start a list.		Staff resources, to provide information on website	Policy staff to facilitate in consultation with conservation team		X		Awareness of assets at risk can help to inform programmes and focus action.	Numbers of heritage assets at risk, numbers reported, surveyed or monitored
Local List	**Establish a local list of non-designated assets:**	**No**							
	Continue to publicise the Local List Guide for East Devon, which advises on procedures and guidance on selection criteria		Policy officer		X			Ongoing	
	Continue to receive submissions from communities and historic interest groups.		Policy team	Submissions from town or parish councils, ward members, neighbourhood planning groups and local amenity groups.	X			Ongoing subject to available resources	Number of groups submitting items consideration
Objectives Theme B	**Actions and tasks**	**Stat. duty**	**Indicative resources**	**Delivery: Staff and Partners**	**Timescale S**	**M**	**L**	**Notes**	**Indicative monitoring**
Local List	Continue to assess, record and publish a list of non-designated heritage assets		Policy staff resources	Policy officer in consultation with conservation team	X				

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Encourage development which enhances distinctiveness	Provide links to further guidance which address the most common issues, on website, much from Historic England.		Minimal staff resources to provide links on webpages	Policy officer in consultation with conservation team		X			Feedback survey on information provided
	Provide information on the website on sourcing of local materials, in particular a stone quarry guide		Moderate staff resources	Conservation and policy team, available through new webpages		X			Completion of guides, number of guides requested; feedback
	Update and publish shopfront and any other relevant guides relating to heritage		Moderate staff resources	Conservation and policy team, available through new webpages		X			Completion of guides, no. requested; feedback

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

Section 4: Appendices



Whimple conservation area

Appendix 1: The historic town centres of East Devon

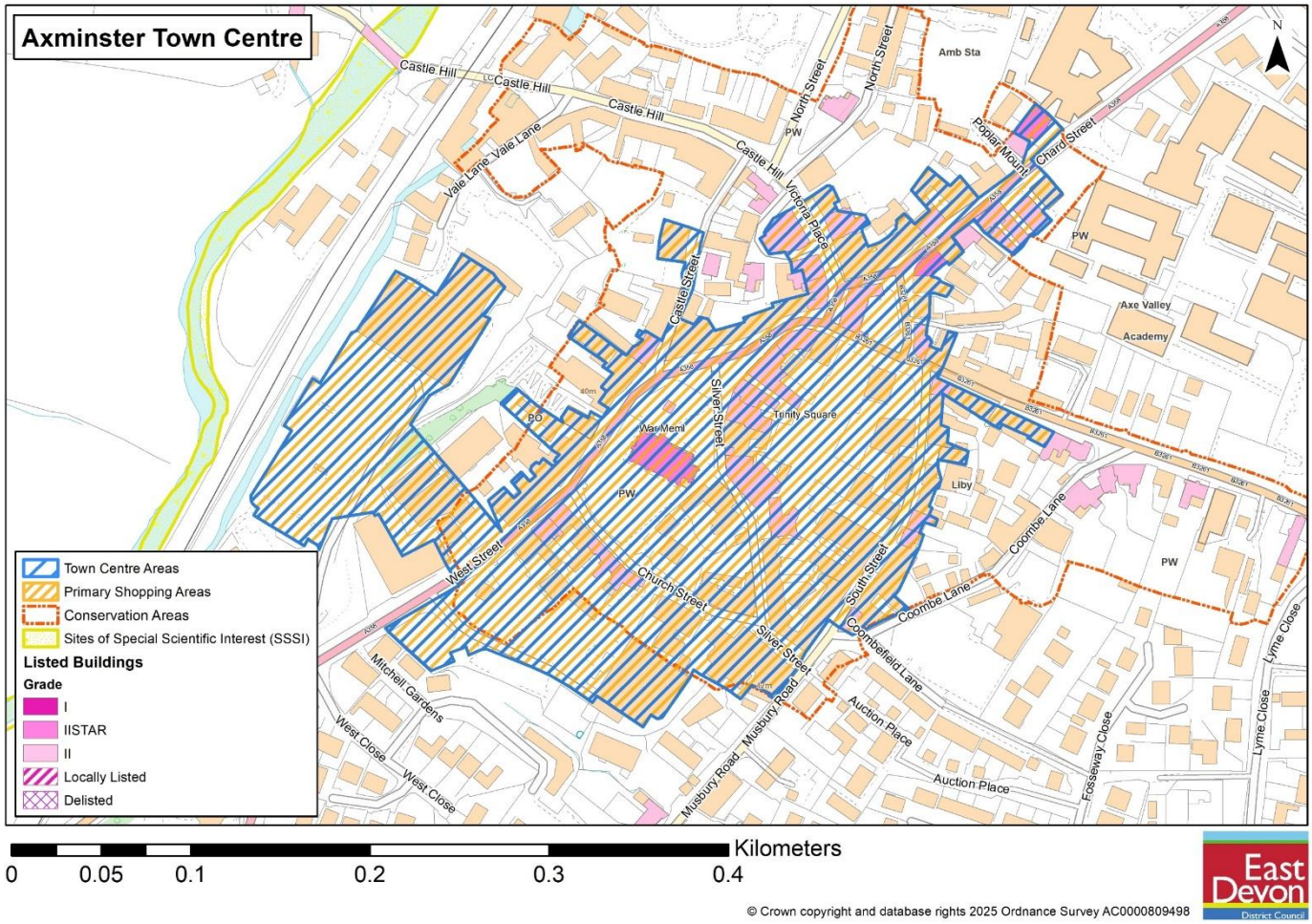
Axminster

Axminster has a long and rich history from its origins as a Roman roadside town, then Saxon, Royal and ecclesiastical centre reflected in its character, and is noted for its textiles and carpet manufacture which started in the mid-18th century.

Most of the town centre is within the conservation area. Growth is proposed with town centre regeneration and improvements to access with provision of a new road to relieve traffic pressure on the historic town centre.

The vision for Axminster in the Local Plan is to conserve and enhance the fine built heritage of the town and surrounding countryside. There are good levels of food retail shopping but low levels of non-food retail which will be encouraged. Growth should support the range of independent shops in the town centre.

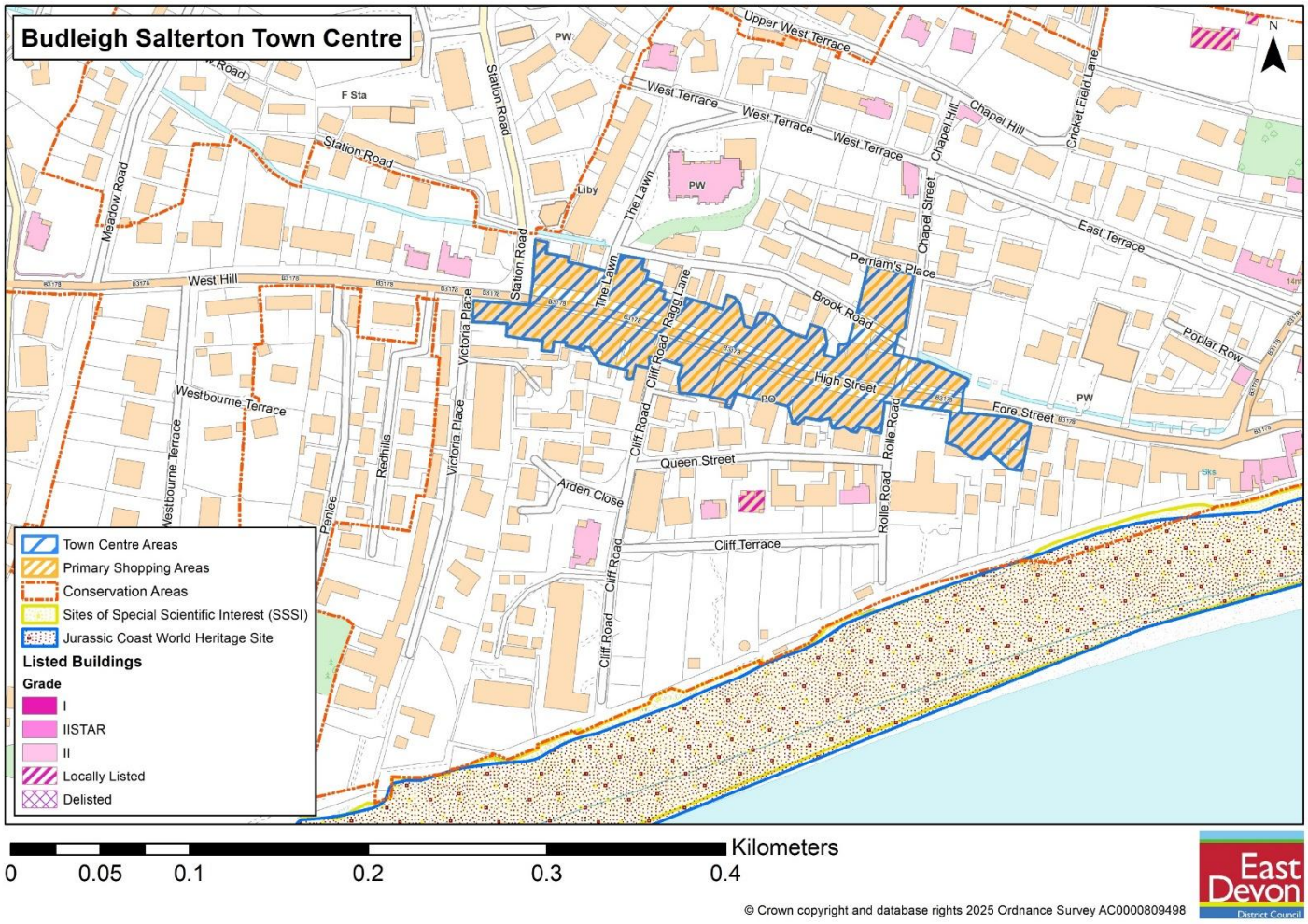
The local plan expects that developments within the town centre, will enhance the townscape quality, reinforce its independent market town character and so contribute to a sense of place.



Budleigh Salterton

The town has a large conservation area which encompasses all of the town centre as well as a long stretch of the promenade at the seafront. It is the only town in East Devon which is completely within a National Landscape. The whole beach and adjoining coastline form part of the World Heritage Site and the town acts as a 'gateway entrance' to the site. The Otter estuary to the east is a Site of Special Scientific Interest. It is also known for "its rich and varied domestic architecture and absence of usual seaside commercialism"[38]. As a result there are strict constraints on development within and adjoining the town.

The town centre contains many important building groups and stretches of unspoilt frontages within the conservation area (adopted in 2007). The town, which originated as a fishing hamlet particularly flourished between the early 19 and 20th centuries, and contains many attractive houses of the late Georgian and Regency period, as well as houses inspired by the Arts and Crafts movement.



[38] EDDC Conservation Area Appraisal (2007)

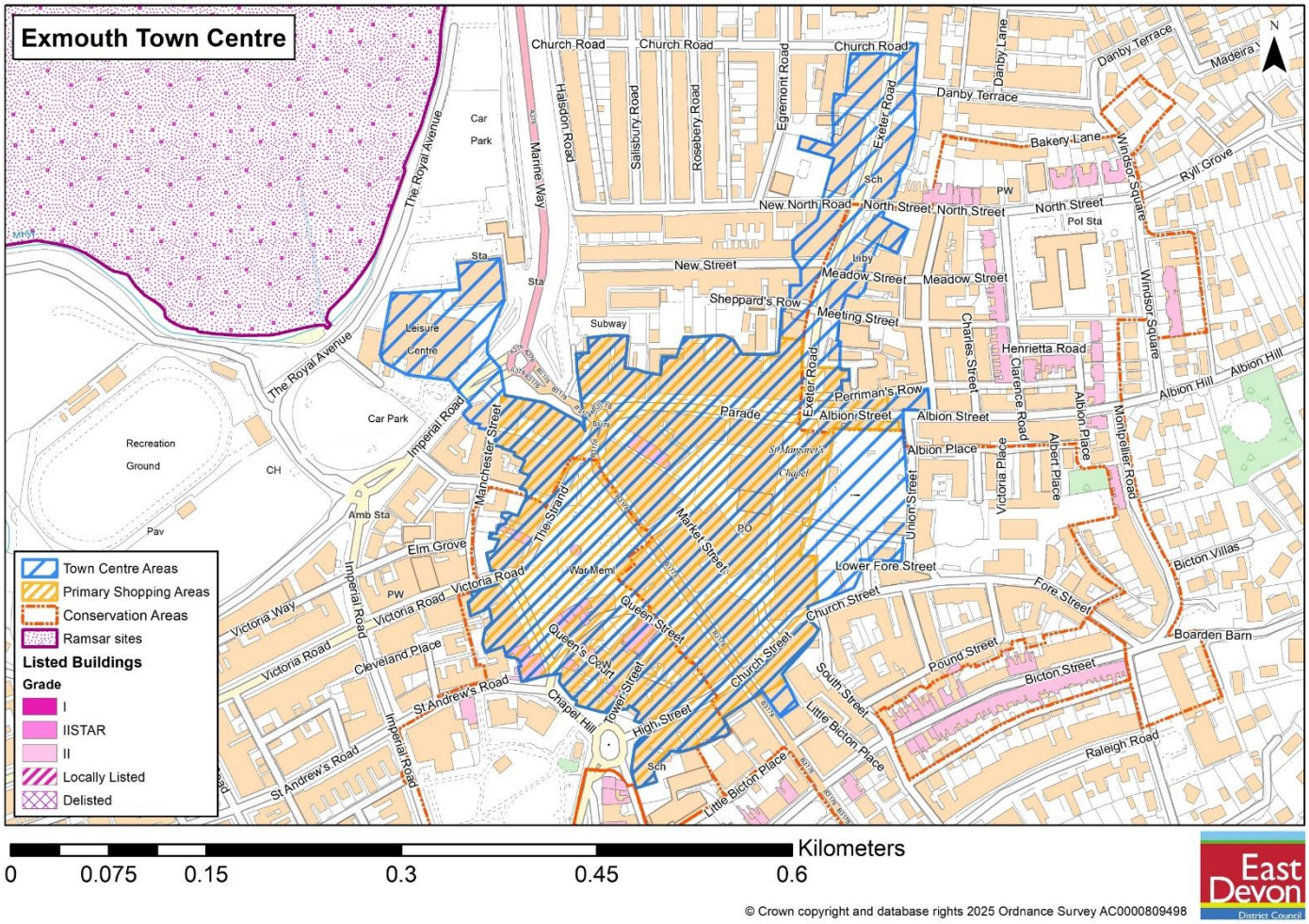
Exmouth

Only a small proportion of Exmouth town centre is within a conservation area, mainly the eastern side of Exeter Road on the outer fringe of the town centre. However conservation areas adjacent to the south and east borders of the centre include many terraces of listed buildings, mainly residential.

There is a focus on town centre enhancement, this area is close to the sea and estuary which are the main tourist areas. This includes an uninterrupted terrace of fine properties from the late 18th and early 19th centuries with sea views. At the nearby seafront, terraces of stuccoed buildings from the late 19th also contribute to the character of Exmouth.

Nearby, the Exe Estuary is a 'Ramsar' site while the World Heritage Site coastline begins further east beyond the promenade.

An Extensive Urban Survey project has been completed for Exmouth, recording the history, archaeological potential and historic character of the modern town. This is available online via the Devon County Council Historic Environment webpages.



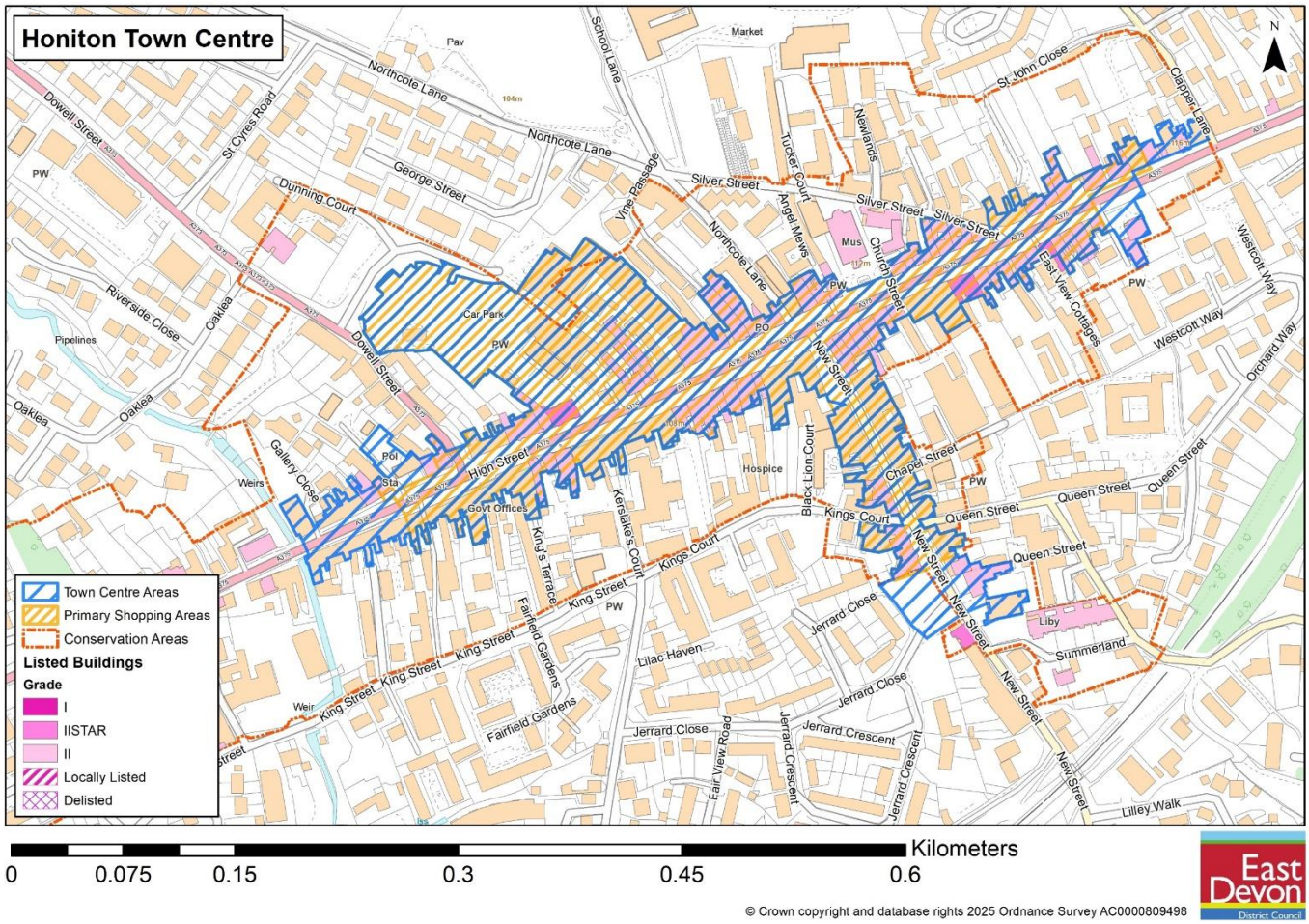
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Honiton

The town centre of Honiton, mainly along one route, lies completely within a conservation area. This High Street is the former Exeter to Dorchester Road, and is flanked by listed buildings, mainly grade II but including some grade II*, and includes a concentration of heritage assets in the medieval planned town. A fire in the centre of the High Street led to many of the medieval cottages being replaced by Georgian houses although much of the burgage plot layout still survives. One of the town's main functions was as a coaching stop, and many large inns remain, although some no longer function as such.

Honiton is noted for its antique shops that attract visitors to the town, access is excellent with a direct link to the adjacent A30 and a railway station serving the Exeter to Waterloo line.

The local plan aims to enhance the environmental quality of the town centre as a major asset for visitors and resource for residents.

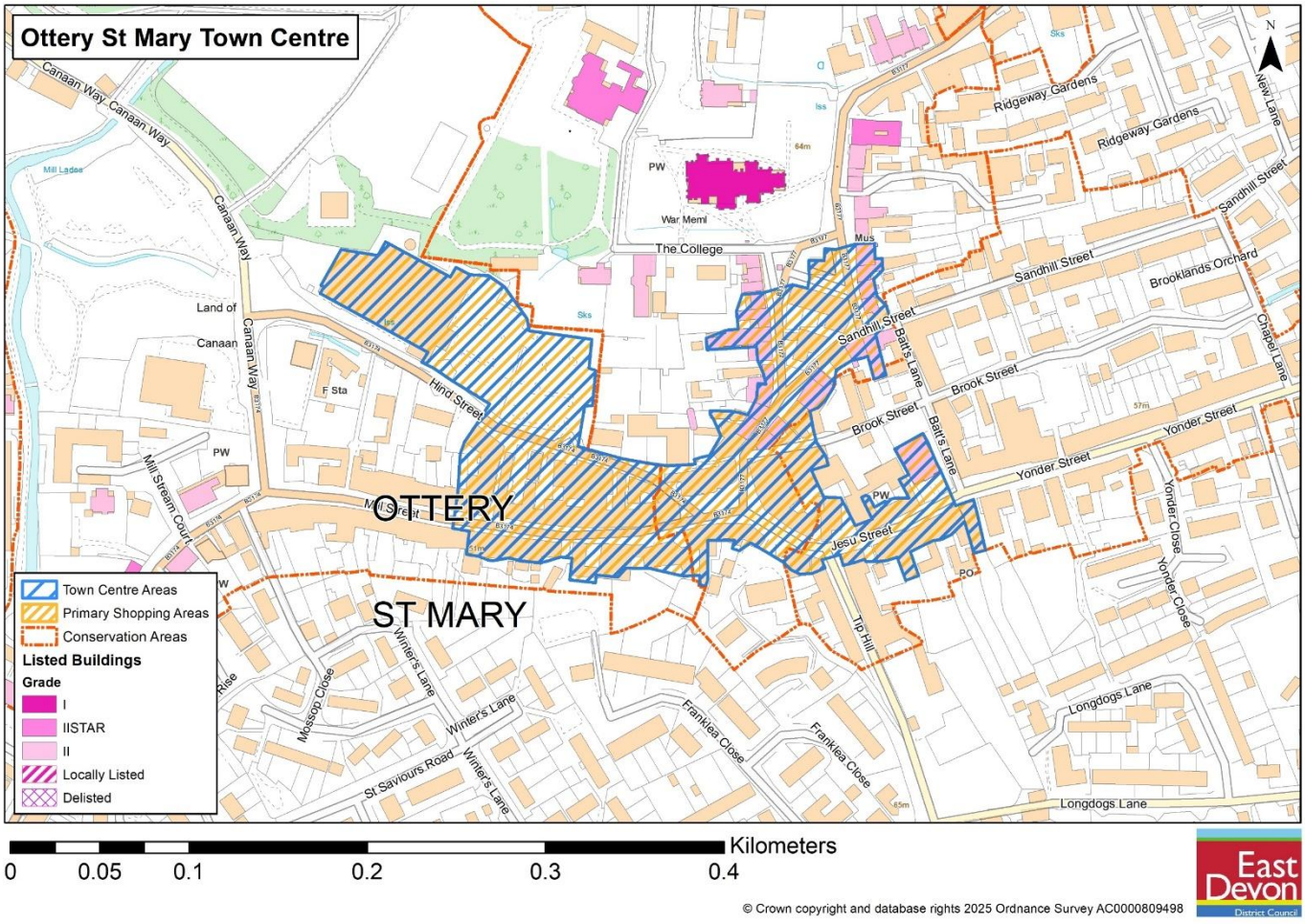


Ottery St Mary

The town is well known for its 'Tar Barrels' cultural event every November, which is believed to have originated in the 17th Century. It has a range of heritage assets where evidence from its early Saxon development, medieval town mill, parish church and collegiate, 18th century industrial development and 19th century literary greats can all be seen. It has a large conservation area, with an historic core of great architectural value within which lies the whole of the town centre including three rows of fine Georgian terraces and the Grade I St Mary's Parish Church.

The local plan has identified Ottery St Mary as a place for new homes and gives priority to the enhancement of the environment and the promotion of business opportunities in the town centre area. Development is focussed on making the town a more vibrant area and the town centre more attractive for residents, businesses and visitors.

Close to the town centre a major regeneration project has centred on redevelopment of the listed 18th century flour mill and wool manufacturing unit. This has improved the setting of the main route into the town. Increased homes within the building and at nearby new developments will in turn help to enhance the viability of the town centre. Conserving the historic qualities of the town and especially the town centre, and promoting these as assets for residents and visitors to the town is a priority.



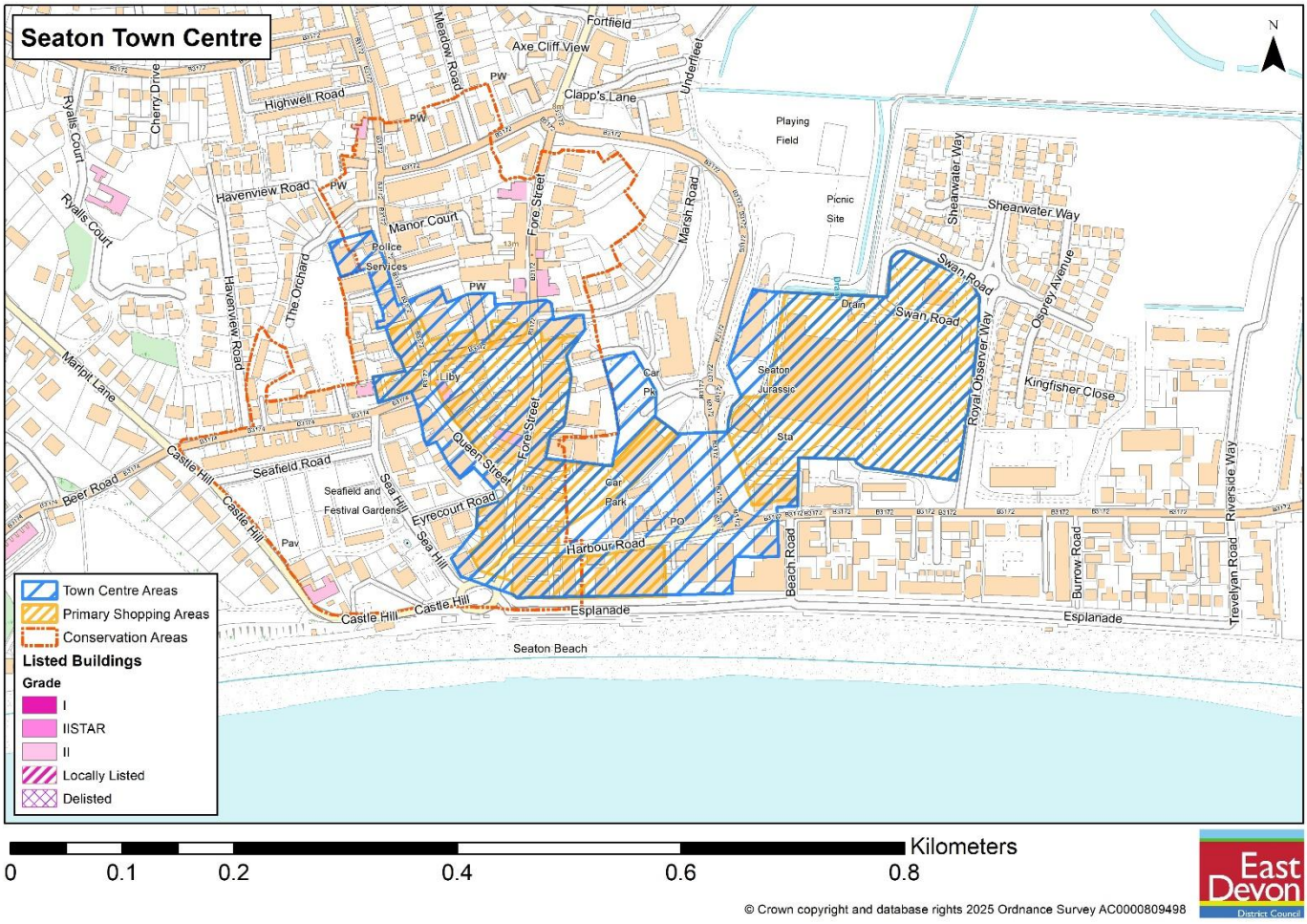
Seaton

The local plan recognises the importance of the Jurassic Coast world heritage site and exceptional surrounding coastline as assets integral to the future success of the town. The town is surrounded by a National Landscape and a number of county wildlife sites.

The town centre contains distinct areas, the recent eastern half being dominated by a large supermarket, a central area which is a focus for regeneration and the western part of the site which lies almost entirely within a large conservation area. The southern part of this conservation area is adjacent to the beach and is a tourist site with distinctive street furniture celebrating the Jurassic Coast. To the west of the Conservation Area items of historic interest include a fine terrace of 19th Century three storey stucco villas.

The local plan emphasises the importance of conserving the natural environment and surrounding ancient heritage assets as well as traditional seaside heritage, including the esplanade and harbour to make the most of 'leisure, cultural and commercial opportunities'.

An Extensive Urban Survey project has been completed for Seaton, recording the history, archaeological potential and historic character of the modern town. This is available on-line via the DCC Historic Environment webpages.



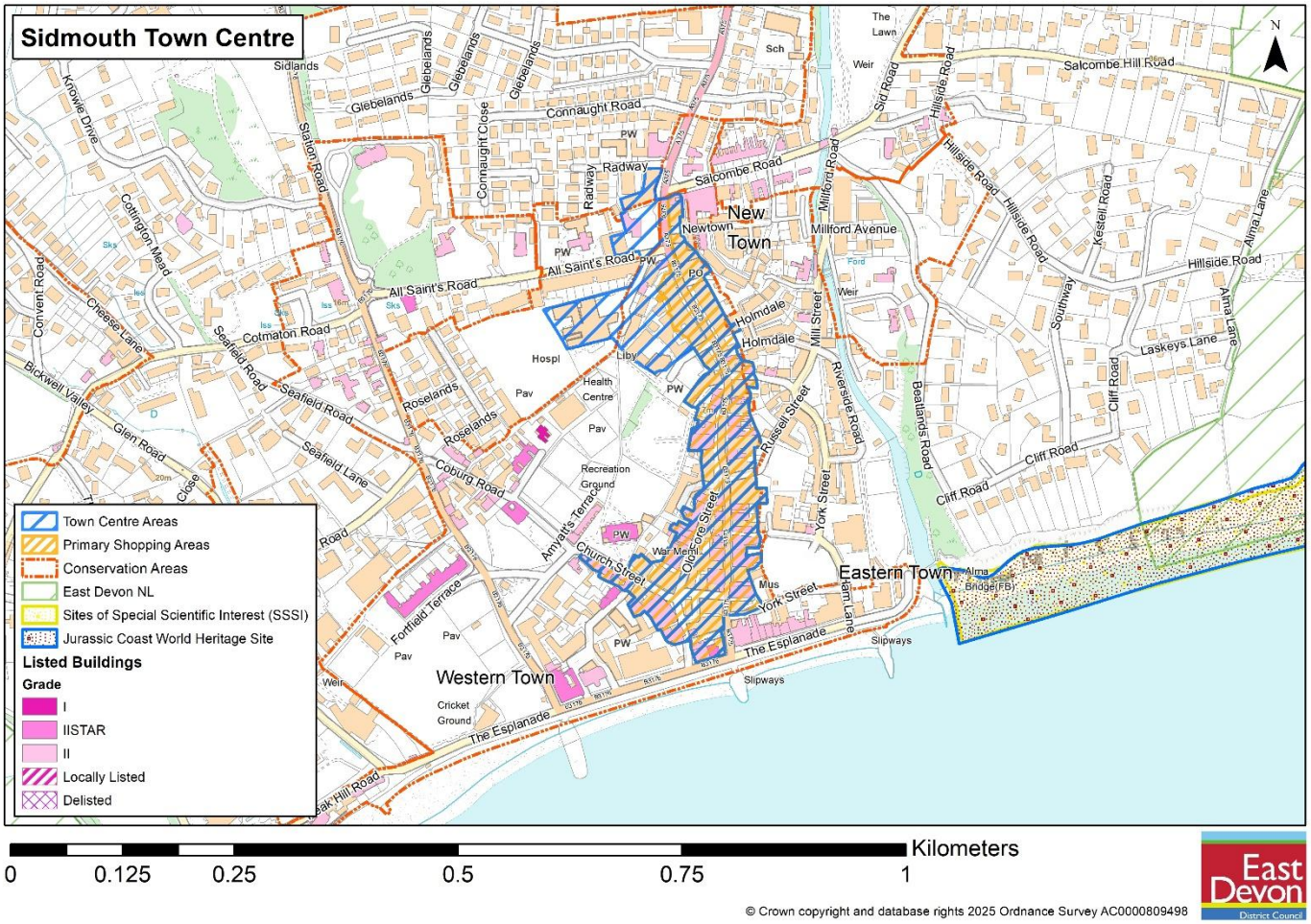
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Sidmouth

The town centre is almost entirely within a conservation area. Many listed buildings line the primary retail frontage, making an attractive shopping area and tourist destination.

Sidmouth is nationally renowned as a fine Regency seaside town of exceptional charm, character and architectural value. Like Seaton, the town is flanked by the Jurassic Coast World Heritage Site to the east and west and surrounded by a National Landscape. There are also extensive National Trust areas in and around the town, adding to its interest for tourists and visitors.

Sidmouth is designated as a “Gateway Town” for the Jurassic Coast World Heritage Site. The town centre is vibrant commercially with many independent shops, bars and cafes and is an important focal point socially for both residents and visitors. The conservation, enhancement and sensitive management of Sidmouth’s heritage, and promotion of these assets, especially in the town centre and Seafront, should be continued.



Appendix 2: The Conservation Areas of East Devon

This appendix provides a very brief description of the Conservation Areas of the District but detailed information on Conservation Areas can be found in each appraisal on the East Devon District Council website.

Villages / small towns:

Beer and extension: this covers most of the village centre and is adjacent to World Heritage Site and National Landscape. Comprising 20.09 hectares.

Broadclyst: the conservation covers the centre of a larger village. The village is surrounded by National Trust land, which is also designated for more than 50% of the conservation area. Includes 2 complete rows of listed buildings and grade I place of worship. Comprising 9.56 hectares.

Broadhembury: this takes up most of the small village and is totally within a National Landscape. There are a large proportion of listed buildings including a Grade I place of worship and 4 grade II* buildings. Comprising 7.2 hectares.

Brampford Speke: On the western borders of East Devon to the north of Exeter, this small village is mainly within the conservation area. To the east and partly inside the conservation area is an SSSI, and to the south a county wildlife park. The conservation area has a good proportion of listed buildings including a Grade I and a Grade II*. Comprising 14.93 hectares.

Chardstock has a Grade II* listed place of worship and is totally within a National Landscape. Comprising 8.1 hectares.

Colyford: follows a linear pattern along the main route, the eastern end is flanked by an National Landscape and a county wildlife site to the southeast. Comprising 14.31 hectares.

Colyton and extension**:** occupying the northern section which is the centre of this small town. It has been extended especially to the north and contains part of a National Landscape. Some larger listed buildings within the original area include a Grade I Place of Worship. Comprising 20.23 hectares.

Combpyne Rousdon: most of this conservation area, comprising 85.13 hectares, is also a Registered Park including Grade II* buildings. It is adjacent to the World Heritage Site, a Site of Special Scientific Interest and a Special Area of Protection. It is totally within a National Landscape.

Dunkeswell: the conservation area is centred on a cluster of farm buildings, cottages and a church.

East Budleigh: the conservation area covers the north western centre of this larger village, with terraces of listed buildings, a Grade II* and a Grade 1 place of worship. It is entirely within a National Landscape. Comprising 4.7 hectares.

Gittisham: is totally within a National Landscape, with a large proportion of listed buildings including a Grade I place of worship and a Grade II* building including a wall. Part of a registered park. Most of this small village is within the conservation area, of 4.7 hectares.

Kilmington: is the smallest conservation area, a large part is within a National Landscape and includes a Grade II* place of worship. Comprising 3.46 hectares.

Lympstone: the conservation area occupies the village centre and along the main route through the village to the river where the western boundary is adjacent to a special protection area, and just south of a National Trust site. There is a large proportion of listed buildings in this area including a Grade II* place of worship. Comprising 10.35 hectares.

Musbury: is totally within a National Landscape with many listed buildings and a Grade I place of worship; comprising 5.65 hectares

Otterton and extension**:** this is a large conservation area covering at least half of this larger village, mainly along the linear route through the village. It is totally within a National Landscape and has a good proportion of listed buildings, a terrace of workers cottages and a Grade II* place of worship. Comprising 13.98 hectares.

Salcombe Regis: is a very small village almost completely contained within the conservation area and completely within a National Landscape. There is a grade II* building. The south and south east boundaries of the conservation area are adjacent to a National Trust and a county wildlife site. The north of the area is dominated by a caravan site and farm. Comprising 6.82 hectares.

Sidbury and extension**:** this area covers about half of this medium sized village, is completely within a National Landscape and has a large proportion of listed buildings. It is overlooked by the prominent hill site of the Iron Age Sidbury Fort. Comprising 11.37 hectares.

Sowton: This small village close to junction 29 is almost entirely within the conservation area with a large proportion of listed buildings including a Grade I place of worship. 10.68 hectares.

Stockland: lies totally within a National Landscape, the conservation area covers most of this small village and includes a Grade I listed place of worship and a grade II* building (the reading room); comprising 8.12 hectares.

Whimple: One of the larger villages, the conservation area includes the village centre and main route, and a grade II* place of worship. Comprising 4.38 hectares

Woodbury: this is a large conservation area covering nearly half of this large village with a number of listed community buildings including the 2 pubs and primary school, a Grade I place of worship and a smaller row of grade II* buildings. Comprising 19.34 hectares.

Towns:

Axminster: the conservation area covers the town centre with a Grade II* church and many listed buildings along street frontage, comprising 10.58 hectares.

Budleigh Salterton: this is adjacent to the World Heritage Site, it contains all of the town centre, and is completely within a National Landscape, comprising 30.27 hectares.

Exmouth areas 1 and 2: a residential esplanade towards the seafront includes a continuous terrace of late 18th and early 19th century properties and a Grade II* place of worship. Behind this a street of listed small terraced properties – the complete row on one side. Comprising 13.02 hectares.

Exmouth area 3: this is mainly a residential area, with Victorian terraces and villas but including part of the town centre and retail frontage. Comprising 6.75 hectares.

Honiton: includes most of town centre and all of the primary retail frontage, with a large number of listed buildings along the high street. This was a Roman road and includes 6 Grade II* listed buildings. Comprising 21.09 hectares.

Ottery St Mary and extension: see town centres, theme C; comprises 52 hectares.

Seaton: This includes part of town centre, retail area and all of primary frontage, see Theme C. Comprises 11.48 hectares.

Sidmouth: Bickwell Valley and extension, in the western part of the town. This is a residential area partly designated as a National Landscape and partly a National Trust site. Contains 4 listed building and comprises 27.27 hectares.

Sidmouth: Elysian Fields, including Grade II* listed church, this comprises 8.53 hectares

Sidmouth: Sidford The conservation area is to the northern part of Sidford, along two main routes and includes a complete terrace of listed buildings. It is just to the south of a National Landscape. Comprising 4.04 hectares.

Sidmouth: Sid Vale and extension: Comprises 20.59 hectares.

Sidmouth: Town centre see Theme C; includes all of the town centre and primary frontage and comprises 28.91 hectares.

Appendix 3: Partners, local history organisations & museums

Partners

East Devon National Landscape
Blackdown Hills National Landscape
Devon and Cornwall Police
Devon County Council
Historic England
Jurassic Coast Trust
National Trust

Local History Organisations

Axminster Historical Society
Axe Vale and District Conservation Society
Axe Valley Heritage Association
Branscombe Project
Broadclsyt Local History Society
Chardstock Historical Record Group
Colyton Parish History Society
Devon Gardens Trust and Devon Gazeteer
Devon Historic Buildings Trust
Devon Historic Churches Trust
Exmouth Civic Society
Exmouth Historical and Archaeological Society
Feniton History Group
Hawkchurch History Society
Honiton History Society
Lympstone History Society
Membury History Society
Newton Poppleford Local History Group
Otter Valley Association
Ottery St. Mary Heritage Society
Sidmouth Local History Group
Sid Vale Association
The Devonshire Association
Whimple History Society
Woodbury Local History Society

East Devon Museums and Heritage Centres include:

Allhallows Museum, Honiton
Axminster Heritage Centre
Axe Valley Heritage Museum, Seaton
Dunkeswell Airfield Heritage Centre
Exmouth Museum
Fairlynch Museum, Budleigh Salterton
Sidmouth Museum
Upottery Airfield Heritage Centre
Whimple Heritage Centre

Report to: Strategic Planning Committee

Date of Meeting 25th November 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

Housing Monitoring Update to year ending 31 March 2025

Report summary:

This report provides a summary of house building monitoring information to the year ending 31 March 2025. The report confirms that, looking forward, we have a 3.50 year Housing Land Supply. Although this is an improvement on the previous monitoring period there is a need to continue to bolster supply through the granting of permissions through application of the tilted balance and the presumption in favour of sustainable development.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

1). Note the residential dwellings completion data and future projections for the district including comments on future supply risks detailed in section 5 of the report;

2). Note the district Five Year Housing Land Supply position and impacts for decision making as set out in this report;

3). Note that the Housing Monitoring Update will be published on the Council's website.

Reason for recommendation:

To keep members informed of housing completions and forward projections.

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

Click here to enter report writer, including contact e-mail address and direct dial number.

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 https://eastdevon.gov.uk/planning/planning-policy/monitoring

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 Through the Planning Policy team, the East Devon District Council (EDDC) produces an annual Housing Monitoring Update (HMU). This report to Committee forms the monitoring report for the year ending 31 March 2025. This document largely focuses on whether the Council can demonstrate a five year housing land supply for the purposes of NPPF paragraph 78 detailed below.

1.2 It is drawn to committee attention that this paper is drafted on the basis of, and in respect to, the new housing requirement figures published alongside the NPPF update in December 2024. Housing requirements set by Government has gone up and as a result, the five year land supply figure that we report has gone down.

2. Housing Need and Supply in East Devon

2.1 The East Devon Local Plan, specifically in respect of housing supply and monitoring purposes, covers the 18 years from 01 April 2013 to 31 March 2031 (however it is relevant to note that the new plan, currently preparing for second Reg 19 consultation, will supersede the current plan long before this end date as a plan is considered out of date after five years). For this 18 year period the plan establishes an objectively assessed need for 17,100 new homes to be created in East Devon. This averages out at 950 homes per year. However, as the current plan was now adopted more than five years ago, we now need to use the latest Government guidance to calculate our baseline figure, the local housing need which is 1,156 homes per year. This takes into account the increases seen in housing targets published alongside the NPPF update in December 2024.

2.2 The table below breaks down the net completions recorded in the twelve years running from 2013 to 2025.

Table 1: Net Total Completions 2013 to 2025

	Apr 13 to Mar 14	Apr 14 to Mar 15	Apr 15 to Mar 16	Apr 16 to Mar 17	Apr 17 to Mar 18	Apr 18 to Mar 19	Apr 19 to Mar 20	Apr 20 to Mar 21	Apr 21 to Mar 22	Apr 22 to Mar 23	Apr 23 to Mar 24	Apr 24 to Mar 25
West End	486	531	403	335	326	392	560	455	568	518	358	393
Rest of East Devon	344	498	624	389	540	537	505	417	479	443	276	297
Annual TOTAL	**830**	**1,029**	**1,027**	**724**	**866**	**929**	**1,065**	**872** Revised to **867** by the MHCLG after taking the net loss of 9 care home bedrooms into account	**1,047** Revised to **1,039** by the MHCLG after taking the net loss of 15 care home bedrooms into account	**961** Expected to be revised to **998** by the MHCLG after taking the net gain of 67 care home bedrooms into account	**634** Expected to be revised to **623** by the MHCLG after taking the net loss of 20 care home bedrooms into account	**690** Expected to be revised to **696** by the MHCLG after taking the net gain of 12 care home bedrooms into account

* The Housing Delivery Test measurement results published by Government is the source for confirming the revised figures (taking into account care home moderations), The 2023 HDT measurement was published in December 2024. See also 4.1 to 4.9.

2.3 There were **10,674** net total dwelling completions in East Devon (including dwelling equivalents from care home accommodation) from 1 April 2013 to 31 March 2025, **690** were in the 2024/25 monitoring year.

2.4 Including the 2024/25 figures, the average level of completions over the last five years is now **845** (including care homes), which is below the adopted local plan housing requirement of 950.

2.5 The annual average since the start of the plan period is **891** dwelling completions which is below the annualised requirement of 950. The increased delivery rate in the last five years has not yet mitigated the slower delivery rate in the first five years. It has not been sufficient to result in a surplus or "oversupply" at the 2025 Monitoring Point.

3. Five Year Housing Land Supply Assessment

3.1 The Council is required to examine its five year housing land supply annually. This is an assessment of whether the projected levels of future house building, taking into account what has been built in the past, is sufficient to meet the levels of housing required by the local plan for the next five years.

3.2 The equations below, with associated explanation, establish the calculated housing land supply in East Devon at a base position of 1 April 2025.

Table 2: Five year requirement plus buffer calculations

East Devon housing requirement and buffer for 01 April 2025 to 31 March 2030			
	Calculation	**No. of dwellings**	**Item**
A		1,156	Local Housing Need
B	Ax5	5,780	Five year requirement target
C	A/20	58	5% buffer
D	B+C	5,838	**Five year requirement target with 5% buffer**
E	D/5	1,168	**Annual Requirement**

Table 3: Five year supply calculations

Supply sources at 31 March 2025 with realistic prospects of delivering dwellings 1st April 2025 to 31st March 2030			
	Calculation	**No. of dwellings**	**Supply sources**
F		2,752	Extant permissions
G		895	Cranbrook Plan DPD expansion zones without Reserve Matters or Unconsented**
H		445	Future windfalls
I	F+G+H	4,092	Total five years deliverable supply
J	D-I	1,746	Five year shortfall figure
Five year housing land supply position at 2025 Monitoring Point			
K	I/E	**3.50**	Years of land supply

* Annual requirement based on Local Housing Need (standard method)
****** Planning applications on three of the four Cranbrook expansion areas received Planning Committee 'Resolution to grant approval' after the 2023 Monitoring Point and stands for the 2025 Monitoring Point.

4. Five Year Land Supply Position – conclusion

4.1 At the 31st of March 2025, East Devon District Council can demonstrate a **3.50** year housing land supply position against the annual requirement of **1,168**. The total number of dwellings deemed deliverable in the five year period being 4,092 dwellings. Comparing the 4,092 forecasted five year supply (including dwelling equivalents from care homes) to the 5,838 net dwellings five year requirement indicates a district supply **shortfall of 1,746** dwellings.

4.2 The results and conclusions in this document supersede all previous East Devon Housing Monitoring Updates reports regarding the previous four and five year housing land supply position.

4.3 Finally, for the avoidance of doubt, the five year housing land supply assessment does not prejudge or predetermine the rolling five year housing land supply assessment to be made in the future relating to the emerging East Devon Local Plan, including the five year land supply position at the anticipated point of plan adoption. The rolling five year housing land supply assessment for the Local Plan will need to be consistent with NPPF and PPG specifically regarding plan-making

5. Housing Delivery Test

5.1 Since November 2018, Councils have also had to pass the new Housing Delivery Test (HDT). Rather than simply looking at what *can* be achieved over the following five years, the HDT checks what *has* been achieved over the previous three, with delivery of the full amount resulting in a score of 100%.

$$\textbf{Housing Delivery Test (\%)} = \frac{\textit{Total net homes delivered over three year period}}{\textit{Total number of homes required over three year period}}$$

5.2 The number of net homes delivered is the national statistic for net additional dwellings over a rolling three year period, with adjustments for net student / other communal accommodation.

$$\textbf{\textit{Net homes delivered in a year}}$$

$$= \textit{Net Additional Dwellings National Statistic}$$

$$\textit{PLUS}$$

$$\frac{\textit{net increase in bedrooms in student communal accommodation in local authority}}{\textit{average number of students in student only households in England}}$$

$$\textit{PLUS}$$

$$\frac{\textit{net increase in bedrooms in other communal accommodation in local authority}}{\textit{average number of adults in households in England}}$$

5.3 The HDT comprises three elements:

i) If delivery has been less than 95%, the council should prepare an Action Plan to address the reason for the shortfall;
ii) If delivery has been less than 85%, the council should also include a 20% buffer in calculating its Five Year Land Supply (rather than 5% or 10%);
iii) If delivery has been less than 75%, the presumption in favour of sustainable development would then apply.

5.4 The results of the Sixth HDT (covering 2020/21 to 2022/23) were released in December 2024. East Devon District Council passed the test with a score of 118%, meaning no action is required.

5.5 Previous Housing Delivery Test measurement results for East Devon were as follows:

First HDT (2015/16 to 2017/18)	149%
Second HDT (2016/17 to 2018/19)	121%
Third HDT (2017/18 to 2019/20)	122%

Fourth HDT (2018/19 to 2020/21)	123%
Fifth HDT (2019/20 to 2021/22)	126%
Sixth HDT (2020/21 to 2022/23)	118%

5.6 The result of the seventh HDT (covering 2021/22 to 2023/24) is anticipated at time of writing.

5.7 In the absence of the seventh HDT measurement being published by Government, the Council continues to use the previously published fourth Housing Delivery Test. This is consistent with NPPF paragraph 22 which states that "*Until new Housing Delivery Test results are published, the previously published result should be used*."

5.8 East Devon passed the sixth Housing Delivery Test with a score of 118%. This means that no buffer is required in the five year housing land supply calculation for the 2025 Monitoring Point in this document.

5.9 Figures used in the calculation of the sixth Housing Delivery Test can be found in the full 2025 HMU report.

6. Buffer ensuring choice and competition

6.1 The NPPF sets out that to allow fair choice and competition or previous undersupply, buffers should be added. Paragraph 78 looks to

6.2 "The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

a) 5% to ensure choice and competition in the market for land; or

b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply; or

c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework, and whose annual average housing requirement42 is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance."

6.3 The HDT currently shows there is no significant under delivery of housing so no 20% buffer is needed at this time. However, to ensure choice and competition, a 5% buffer is required to be added to the annual target. We will need to await the Housing Delivery Test result for 2025. In the event that delivery is below 95% of the requirement, we would need to prepare an action plan to address under-delivery. If delivery is below 85%, a 20% buffer is added to the five-year housing land supply requirement, and an action plan is still needed. If delivery is below 75%, the "presumption in favour of sustainable development" applies to planning applications. Clearly the 20% buffer would present the greatest challenge since we are progressing actions to bolster our housing land supply already and the presumption in favour is already in place due to our lack of a 5 year housing land supply.

7. Five year housing land supply by sub-area

7.1 The table below breaks down the net completions recorded in the ten years running from 2013 to 2025 in both the West End (*Cranbrook and other big strategic housing sites on the Western side of the District)* and the Rest of East Devon excluding adjustments for care homes.

Table 4: Net Total Completions 2013 to 2025

	Apr 13 to Mar 14	Apr 14 to Mar 15	Apr 15 to Mar 16	Apr 16 to Mar 17	Apr 17 to Mar 18	Apr 18 to Mar 19	Apr 19 to Mar 20	Apr 20 to Mar 21	Apr 21 to Mar 22	Apr 22 to Mar 23	Apr 23 to Mar 24	Apr 24 to Mar 25
West End	486	531	403	335	326	392	560	455	568	518	358	393
Rest of East Devon	344	498	624	389	540	537	505	417	479	443	276	297

7.2 Applying the five year housing land supply calculations in Table 3 with data from Table 4, the two sub areas results in the following five year housing land supply positions:

- West End 3.49 years supply
- Rest of East Devon 3.61 years supply

7.3 The positions shown above highlight the issues seen in both the West End and in the rest of East Devon on supply. Action to rectify the position has occurred, namely:

- The Cranbrook Plan DPD was adopted.
- In three of the four Expansion Areas, there are recent planning applications where Planning Committee resolved to grant planning approval, subject to S106 agreements.
- Master planning is underway for the creation of Marlcombe, a new town situated in the West End.
- Work is ongoing on the new Local Plan which is currently nearing 2nd Reg 19 stage which allocates a range of sites for housing and mixed use development across all of East Devon.

7.4 This is the first year of the updated standard method which has seen an increase in Local Housing Need from 893 to 1156, it will take time to achieve these figures given the 29% increase. On top of this, there is a new requirement to increase the annual target by 5%, leading to a 1,168 Annual Requirement.

8. Conclusion in respect of current requirements

8.1 At 31 March 2025, East Devon District Council can demonstrate a **3.50** year housing land supply against the annual requirement of 1,168 dwellings. The total number of dwellings deemed deliverable in the five year period is 4,092 meaning there is a supply shortfall of 1,688 dwellings against the five year housing requirement of 5,838.

9. Key considerations looking forward

9.1 As expected, the Government elected in July 2024 changed the Local Housing Requirements for East Devon to those issued within the consultation in the summer of 2024. East Devon LHN figures were published with new numbers for the whole of England alongside an update to the NPPF in December 2024. For most local authorities, including for East Devon, numbers have gone up (for England as a whole they go up quite

substantially). The higher housing numbers established by Government for East Devon have severely reduced the housing land supply figure stated in this report.

9.2 Although the housing land supply position has improved since the previous monitoring period it is essential that the Council continues to grant planning approvals in order to maintain and improve housing supply in future years.

9.3 The Council will need to give appropriate weight to the lack of a 5-year housing land supply as part of the planning judgement made when determining planning applications. This is particularly important when determining full and reserved matters planning applications. Detailed planning approvals and resolution to grant planning approval are currently the most effective way to provide 'clear evidence' that sites are deliverable and can be included in the five-year housing land supply.

9.4 The Council will soon need to be able to demonstrate to a planning inspector at plan examination that there will be a five year land supply at the point of local plan adoption, this is projected to be in late 2026. To get to this position we will be on vulnerable ground if we are to seek to argue that allocated sites, without a planning permission, will rapidly gain permission and start accommodating development at a rapid rate and such make a substantive contribution to the future five year land supply. As such there is a very real vulnerability in the ability to secure a positive report from an inspector on the local plan, allowing for plan adoption, unless we start to grant additional planning permissions for development.

9.5 A number of allocation sites are however, progressing through the planning application process, having applied since consultation on sites was completed in spring 2025, showing there is an appetite from developers. Further work on the local plan trajectory has involved the consultation of developers to gain a better understanding of future supply. However, land without planning permission at the point of monitoring are not eligible to be included, exceptions are made for areas with resolution to grant (e.g. Cranbrook expansion areas).

Financial implications:

There are no direct financial implications identified within the report. (AB/13/11/2025)

Legal implications:

The legal implications are covered in this report (002533/14 November 2025/DH)

Planning policy

Housing Monitoring Update

Up to 31 March 2025



November 2025

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1 Introduction

1.1. This document provides the housing monitoring update for East Devon District Council (EDDC) to a base date of **31 March 2025**. It forms part of the district's Authority Monitoring Report for monitoring development and related key indicators in the adopted East Devon Local Plan 2013 to 2031. Section 113 of the Localism Act (2011) removed the requirement for councils to submit an Annual Monitoring Report (AMR) to the Secretary of State but allowed monitoring reports to be produced covering individual indicators which must be published at least once a year. This housing monitoring update complies with that requirement.

1.2. One key indicator in the adopted local plan is the number of new dwellings built annually within the district. This document reports on annual completions since 2013.

1.3. The adopted local plan also identifies non-delivery of the five year housing land supply as a trigger for policy review and action. In accordance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). This document provides the current five year housing land supply position for East Devon district as of 31 March 2025 and the necessary supporting evidence. The five year housing land supply is to be used in the operation of NPPF paragraph 78 for development management purposes. The housing supply position covers the five year period from 1st April 2025 to 31st March 2030. It applies from the day after this document is published.

1.4. The East Devon Local Plan 2013 to 2031 is not 'recently adopted' and the council does not have a previous Annual Position Statement. For these reasons, and for the avoidance of doubt, the council will not be submitting this Housing Monitoring Update 2025 as an Annual Position Statement to 'confirm' the five year housing land supply position for the purposes of NPPF Paragraph 78 and 79 (and PPG Housing supply and delivery paragraphs 12 to 18 and 60).

1.5. The most recent at time of publishing National Planning Policy Framework, December 2024, can be found on-line at:

https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

The most up to date Planning Policy Guidance, at time of publishing, which is relevant to this report can be found on-line at:

https://www.gov.uk/guidance/housing-supply-and-delivery

1.6. This report considers the following:

Housing completions since 1st April 2013, and in particular the completions over the last 12 month period (1 April 2024 – 31 March 2025) including:

- Total net completions district wide.
- Gross completions districtwide by parish, settlement, and Built-up Area Boundary.
- Breakdown of completions on brownfield and greenfield sites.
- Affordable housing.

Forecasts future housing completions which provide the housing trajectory from 1 April 2025 to the end of the adopted Local Plan period.

The East Devon five year housing land supply position as of 31 March 2025 (for the period 1 April 2025 to 31 March 2030) for NPPF paragraph 77 purposes.

Comparison of past and future forecast housing delivery to the following:

- The key monitoring indicator (17,100 dwellings in the plan period)
- The residential development trajectory illustrating the expected rate of housing delivery over the plan period, and related Appendix 2 in the adopted East Devon Local Plan 2013 to 2031.

2 Completions 2024-25

How do we know if a house has been completed?

2.1 Housing completions are monitored throughout the year using the Housing Monitoring database, which is linked to the main EDDC Uniform database. This includes new builds, change of uses and conversions.

2.2 When the Basic Land and Property Unit (BLPU) state of any given dwelling's Unique Property Reference Number (UPRN) changes (to BLPU State 2 – 'In Use' and a Primary Classification of 'Residential') within Uniform (i.e. a property is Council Tax banded), this will feed through to the appropriate planning record on the Housing Monitoring database.

How is a "dwelling" defined?

2.3 For the purposes of housing monitoring, generally, a dwelling is defined as being a separately Council Tax banded property. As an example, this would mean that if a house that had previously been a single Council Tax banded dwelling were to be split into four flats, each being separately Council Tax banded, then there would be an assumed three net new dwellings on the site upon completion.

2.4 Annexes are not counted as a dwelling unless they become separately Council Tax banded, have the appropriate planning permission and are not tied conditionally to only be used as ancillary to the main dwelling.

2.5 In addition to this, the Housing and Economic Land Availability Assessment (HELAA) methodology for the Exeter Housing Market Area (HMA) revised in 2021, states that care

Commented [JD1]: Good catch James. I've looked at the HELAA report so many times that I should really know when it was published!

and extra-care homes should contribute towards dwelling numbers despite units not being separately Council Tax banded. The reasoning for this is that as elderly people move into care / extra-care homes they "free up" open market dwellings for others to move into.

2.6 The methodology conservatively assumes that one dwelling is freed up by every two nursing or care home beds created. This is based on primary research conducted within the HMA whereby existing care homes were contacted to find out numbers of residents, the proportion that were permanent and the proportion that had previously lived alone. This research suggested that on average 50% of residents were permanent and had previously lived alone which suggests that when they permanently moved to the care home, they were leaving an empty house.

n.b. New care/nursing home places in the October 2013-March 2014 monitoring period assumed 1.4:1 as a ratio, whilst from April 2014 to September 2014 1.67:1 was the assumed ratio. The Government's new Housing Delivery Test uses a ratio of 1.8:1; however, gains and losses in communal accommodation are now reported separately to the main figures, with an assessment made on the number of bedrooms in question.

Net Total completions

2.7 Net completions have fluctuated in the period 2013 to 2025. Of these, there have been five years, including the previous two, delivering above the annualised 950 dwellings per year policy requirement in the adopted local plan. Net completions take into account losses, in this case demolitions or changes of land use away from residential and as a result, is lower than the gross figures detailed later in the report.

2.8 A full schedule of completions and projections with planning permission by site from the start of the Local Plan period can be found in Appendix 2 to this report.

2.9 The table below breaks down the district net completions figures into two sub areas: West End and the Rest of East Devon. The West End can be defined as Cranbrook and other big strategic development sites on the Western side of the district, the area not within the West End is defined as the Rest of East Devon. These 2 sub areas are used for monitoring housing delivery.

Commented [MD2]: Be good to add a definition of where/what the West End is.

TABLE 3: Net Total Completions 2013 to 2025 – District and sub areas

	Apr 13 to Mar 14	Apr 14 to Mar 15	Apr 15 to Mar 16	Apr 16 to Mar 17	Apr 17 to Mar 18	Apr 18 to Mar 19	Apr 19 to Mar 20	Apr 20 to Mar 21	Apr 21 to Mar 22	Apr 22 to Mar 23	Apr 23 to Mar 24	Apr 24 to Mar 25
West End	486	531	403	335	326	392	560	455	568	518	358	393
Rest of	344	498	624	389	540	537	505	417	479	443	276	

	Apr 13 to Mar 14	Apr 14 to Mar 15	Apr 15 to Mar 16	Apr 16 to Mar 17	Apr 17 to Mar 18	Apr 18 to Mar 19	Apr 19 to Mar 20	Apr 20 to Mar 21	Apr 21 to Mar 22	Apr 22 to Mar 23	Apr 23 to Mar 24	Apr 24 to Mar 25
East Devon												297
Annual TOTAL	830	1,029	1,027	724	866	929	1,065	872 Revised to 867 by the MHCLG after taking the net loss of 9 care home bedrooms into account	1,047 Revised to 1,039 by the MHCLG after taking the net loss of 15 care home bedrooms into account	961 Expected to be revised to 998 by the MHCLG after taking the net gain of 67 care home bedrooms into account	634 Expected to be revised to 623 by the MHCLG after taking the net loss of 20 care home bedrooms into account	690 Expected to be revised to 696 by the MHCLG after taking the net gain of 12 care home bedrooms into account

Commented [JC4]: @Joseph Dunnett Has this been confirmed yet (i.e. no need to say 'expected to be')?

Commented [JD5R4]: I cant seem to find the right live table to see what they have adjusted the figure to, if they have indeed adjusted the figures

It feels like it should be here but I have downloaded and viewed each of the table and I'm still none the wiser?

Housing supply: net additional dwellings - GOV.UK

Commented [JC7]: @Joseph Dunnett Has this been confirmed yet (i.e. no need to say 'expected to be')?

Commented [JC3]: HDT 2023 says 904 https://assets.publishing.service.gov.uk/media/6759ccfbad4694c785b0eddb/Housing_Delivery_Test_2023_measurement.ods

Commented [JC6]: HDT 2023 says 996 https://assets.publishing.service.gov.uk/media/6759ccfbad4694c785b0eddb/Housing_Delivery_Test_2023_measurement.ods

Key monitoring indicator results

2.10 Based on the table above, there were **10,674** net total dwelling completions in East Devon (excluding dwelling equivalents from care home accommodation) from 1 April 2013 to 31 March 2025; **690** of these were in the 2024/25 monitoring year. Resulting in an average of 890 dwellings completed each year over the plan period.

2.11 Since the start of the plan period the average annual completions (including care homes) is **891** dwellings/dwelling equivalents per year, which is below the adopted local plan housing requirement. The average annual level of completions (including care home dwelling equivalents) has improved over the last five years and is now **845** per year, which is below the adopted local plan housing requirement of 950, the revised LHN of 1156, and annual target of 1168**.** The increased delivery rate in the last five years has not yet mitigated the slower delivery rate in the first five years. It has not been sufficient to result in a surplus ("oversupply") at the 2025 Monitoring Point.

Completions by parish

2.12 The table below shows gross completions during the 2024/25 monitoring period by parish. Parishes where there were no 2024/25 completions are not listed. Town councils are highlighted in yellow.

Commented [MD8]: Might want to note that gross completions are very similar to but marginally differ from net completions as they do not take account of very small number of losses of existing dwellings (I assume this is the reason).

TABLE 4: Gross dwelling completions by parish

Parish	Total	Parish	Total
Awliscombe	3	Gittisham	13
Axminster	23	Honiton	55
Beer	3	Kilmington	1

Broadclyst	222	Newton Poppleford and Harpford	1
Broadhembury	5	Offwell	2
Buckerell	1	Ottery St. Mary	15
Budleigh Salterton	1	Plymtree	1
Clyst St. George	1	Rockbeare	1
Clyst St. Mary	1	Seaton	18
Colaton Raleigh	1	Shute	1
Colyton	1	Sidmouth	1
Combe Raleigh	1	Sowton	1
Cranbrook	172	Talaton	3
Dunkeswell	9	Uplyme	2
East Budleigh	1	Upottery	2
Exmouth	139	Upton Pyne	1
Farringdon	2	Yarcombe	1
		Grand Total	**705**

Completions by settlement

2.13 The table below shows gross completions during the 2024/25 monitoring period by settlement. Settlements are identified in the adopted local plan and completions have been sorted into settlements using the built-up area boundaries (BuAB) of the settlements or by very close proximity where settlements don't have BuAB. Settlements where there were no 2024/25 completions are not listed.

Commented [MD9]: Does this need qualifying or extra text adding as Weston, Honiton (I assume, but not sure where the reference refers to) does not have a Built-up Area Boundary. Or should the text refer to at/or around the settlement noting the section below. Also, perhaps for the future, is there any merit in have this section and the next? They end up saying very similar things.

TABLE 5: Gross dwelling completions by settlement

Settlement*	Total	Settlement*	Total
Axminster	23	Kerswell	2
Beer	3	Newton Poppleford	1
Broadclyst	1	North of Blackhorse	94
Budleigh Salterton	2	Ottery St Mary	2
Clyst Honiton	35	Payhembury	3
Clyst St George	1	Pinhoe	71
Clyst St Mary	2	Rural areas	31
Colyton	1	Seaton	18
Cranbrook	172	Sidmouth	1
Dunkeswell	1	Uplyme	2
Dunkeswell (Highfield)	8	Upton Pyne	1
Exmouth	139	West Clyst	20

Farringdon	1	Weston, Honiton	2
Honiton	68	**Grand Total**	**705**
**Settlements as identified in the adopted East Devon Emerging Local Plan settlement hierarchy*			

Completions by Built-up Area Boundary (BuAB)

2.14 The below table shows gross completions in the 2024/25 monitoring period by BuAB. The table is based on boundaries shown on the Policies Map from Development Plan Documents that were adopted or made as of 31 March 2025. Those BuABs where there were no 2024/25 completions are not listed.

TABLE 6: Gross dwelling completions by BUAB

BuAB	Total	BuAB	Total
Axminster	23	Newton Poppleford	1
Beer	3	North of Blackhorse	94
Broadclyst	1	Open Countryside	126
Budleigh Salterton	1	Ottery St Mary	2
Clyst St Mary	1	Pinhoe	72
Colyton	1	Seaton	18
Cranbrook	166	Sidmouth	1
Exmouth	139	Uplyme	1
Honiton	55	**Grand Total**	**705**

Completions split by Greenfield / brownfield

2.15 The table below shows the breakdown of gross completions between greenfield and brownfield sites during the 2024/25 monitoring period.

TABLE 7: Gross dwelling completions by Greenfield/Brownfield

		Dwellings	%
Greenfield	General Greenfield	537	95%
	Garden Greenfield	18	3%
	Greenfield Ag/Forestry Building Conversion	12	2%
	Total	567	80%
Brow	Brownfield Redevelopment	107	78%
	Brownfield COU	31	22%

	Total	138	20%
	GRAND TOTAL	705	100%

2.16 Greenfield describes any site on land which has not previously been developed. Brownfield therefore describes sites of previously developed land, the definition of which can be found within the glossary of the NPPF but is reproduced below for ease of reference:

***"Previously developed land:** Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape."*

2.17 The table above shows that 80% of completions in the district during the 2024/25 monitoring period were on greenfield sites, which is 5% more than during the 2023/24 monitoring period.

Affordable completions

2.18 The Housing Strategy and Enabling team report a total of 236 affordable units delivered during 2024/25, including 36 for social rent, 95 for affordable rent and 105 shared ownership.

Key facts for the year

- EDDC acquired 10 properties from the open market this year using Right to Buy receipts and LAHF (Local Authority Housing Fund) Round 2 funding to add to council stock
- 74 affordable homes have been completed at Cranbrook
- 15 affordable homes completed at Exmouth – Plumb Park
- 33 affordable homes at Pinhoe
- 95 market units were purchased and converted to affordable with Homes England funding

Net Windfall completions

2.19 Windfalls refer to sites built out which are the result of planning applications on sites which have not been allocated in the Local Plan.

Commented [MD10]: Did we ever get to a point where we have a site by site breakdown of all affordable houses that have been delivered through new developments. This figure presumably includes these three bullet pointed items but what about the top bullet pointed one.

Commented [JD11R10]: There is a completions by year breakdown that Cassandra has worked on (I haven't spent much time trying to understand the figures but they are there) alongside a trajectory of future affordable completions. Tim has worked through the additional affordable completions brought forward by allocations using policy using % affordable figures, resulting in a affordable trajectory.

2.20 The table below shows that over the past 12 months 308 of the 690 net completions have been windfalls. This equates to 45% of net completions in the last year. Of these 308 net windfall completions, only 83 were in the West End with the remaining 225 in the Rest of East Devon. Resulting in 27% being in the West End and 73% in the Rest of East Devon.

TABLE 8: Net windfall completions (excluding garden-greenfield sites)

Gross site capacity	1-2 dwellings*	3-5 dwellings*	6-9 dwellings*	10-20 dwellings*	21+ dwellings*	TOTAL
RoED	46	32	20	7	120	225
West End	2	0	1	5	75	83
TOTAL	48	32	21	12	195	308
Percentage	15.6%	10.4%	6.8%	3.9%	63.3%	100%

*Dwellings (excluding garden-greenfield sites)

Net communal accommodation completions

2.21 Gains and losses of Use Class C2 (Residential Institutions) are reported to the Ministry of Housing, Communities & Local Government (MHCLG) through the annual Housing Flow Reconciliation Return. These figures are separate from the figures reported for gains and losses of dwellings. However, when converted to net dwelling equivalents, the change in communal accommodation is reported via the net supply figures used by Government to calculate housing supply delivery used for the Housing Delivery Test. They are reported in the Government's live tables on dwelling stock.

2.22 One care home had seen new beds created in the 2024/25 monitoring year in East Devon district: The Curlews, Exmouth (12 bedrooms). It is anticipated this will result in a net gain of the equivalent of 6 dwellings once confirmed by the MHCLG.

2.23 No gains of shared accommodation, such as student accommodation occurred in the 2024/25 monitoring year.

Commented [JC12]: @Joseph Dunnett This contradicts Table 3 and paragraph 2.22

3 Projections 2025-2029

3.1 This section is an assessment of forecast and projected completions for the remainder of the plan period from 1 April 2025 to 31 March 2031. The forecasts and projections can be broken down into:

- Sites with extant permissions at the 2025 Monitoring Point:
  - These are sites that already have planning permission (either detailed or outline, and including sites that are already under construction / sleeping) that are expected to be built out.
- Windfalls:
  - These are the adjusted allowance for completions on windfall sites, with the projection based on historic windfall completions (to avoid double counting, the adjusted allowance discounts small windfall sites with extant planning permission at the 2025 Monitoring Point).
- Cranbrook expansion zones:
  - These are forecast completions on the four Cranbrook expansion areas – Treasbeare, Bluehayes, Cobdens and Grange are allocated in the Cranbrook Plan DPD adopted 19 October 2022. These include sites with recent Planning Committee resolutions to grant planning approval subject to completion of S106 agreements and have begun to gain outline and reserve matters permissions.

3.2 The planned housing development in the Axminster Masterplan area (including the adopted local plan allocation) is not forecast for delivery. The Council considers that due to the issues of nutrient neutrality, and the lack of funding to deliver the relief road this land is currently not deliverable. Although some areas in previous plans did not see development, it is expected that some sites still have potential and may be reallocated in the new local plan.

3.3 Annex 3 of the National Planning Policy Framework (NPPF) defines a “deliverable” site as follows:

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

3.4 The HELAA Methodology 2021, shown in the table below, was agreed between the four local authorities (East Devon District Council, Exeter City Council, Mid Devon District Council, and Teignbridge District Council). It is reproduced as part of the East Devon Housing and Economic Land Availability Assessment 2022 (Appendix A is the HELAA Methodology 2021). This is available online at:

https://eastdevon.gov.uk/media/3724867/appendix-a-helaa-methodology-may-2021.pdf

TABLE 9: HELAA Methodology for calculating build-out rates

	Commencement of sites			Build-out rate	
Size of site (no. of dwellings)	**Sites where dwellings are under construction**	**Sites where dwellings have planning permission**	**Suitable sites without planning permission**	**Years 1-5**	**Years 6+**
1-15 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 1	Commence in Year 3	1st year - 12 dwellings maximum. 2nd year onward - 25 dwellings per year maximum	1st year - 25 dwellings maximum. 2nd year onward - 50 dwellings per year maximum
16-500 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 2	Commence in Year 3	1st year - 12 dwellings maximum. 2nd year onward - 25 dwellings per year maximum	1st year - 25 dwellings maximum. 2nd year onward - 50 dwellings per year maximum
501-1,000 dwellings (assumes two developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1st year - 12 dwellings maximum. 2nd year onward - 50 dwellings per year maximum	1st year - 25 dwellings maximum. 2nd year onward - 100 dwellings per year maximum
1001+ dwellings (assumes three developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1st year - 12 dwellings maximum. 2nd year onward - 75 dwellings per year	1st year - 25 dwellings maximum. 2nd year onward - 150 dwellings per year

Small site projections (1-9 dwellings total)

3.5 Projections are based on the status of sites and extant planning permissions at 1st April 2025. Projected build-out rates for small sites (1-9 dwellings in total) generally follow the approach advocated by the Exeter Housing Market Area (HMA) Housing and Economic Land Availability Assessment (HELAA) methodology market conditions model, unless we are aware of an alternative build-out rate.

Large site projections (10+ dwellings total)

3.6 Projected build-out rates for large sites (10+ dwellings in total) have been calculated by consulting with the relevant developer responsible for each planning permission. Each Large site developer was contacted regardless of planning permission progress under construction to awaiting decision on an outline application. Developer consultation took place in summer 2025.

Windfall projections

3.7 As mentioned, paragraph 75 of the NPPF allows for future additional windfall completions to be taken into account so long as historic windfall delivery is considered and with the implication that sites on gardens are not counted.

Commented [JC13]: @Joseph Dunnett I think this reference may now be paragraph 75? Please check!

3.8 The Exeter HMA HELAA methodology sets out a clear process by which windfalls will be calculated assessing delivery of windfalls (excluding gardens and sites of more than 20 gross dwellings) over the last five full years. That being the case, the assessment below shows net windfall completions (excluding gardens) over the last five full years (1 April 2020 to 31 March 2025).

3.9 Net completed windfall dwellings are split into the gross capacity of the site on which they came forward in order to be able to analyse the types of windfalls that might come through in the future:

TABLE 10: Windfall completion analysis 2020-2025

Gross site capacity	Apr 2020 to Mar 2021	Apr 2021 to Mar 2022	Apr 2022 to Mar 2023	Apr 2023 to Mar 2024	Apr 2024 to Mar 2025	Average per year
1-2 dwellings	50	58	43	35	48	46.8
3-5 dwellings	30	19	17	25	32	24.6
6-9 dwellings	35	3	26	14	21	19.8
10-20 dwellings	22	47	32	11	12	24.8
Totals	**137**	**127**	**118**	**85**	**113**	**116**

3.10 The table above identifies a basic net average windfall projection of 116 dwellings. The methodology then requires this figure to be tempered by subtracting projected windfall completions on sites with planning permission or resolution to grant permission subject to S106. The table below shows how this figure is tempered accordingly to identify the adjusted windfall projection for each forecast year:

TABLE 11: Adjusted windfall projections 2025-2030

Final projected windfall allowance	2025 to 2026	2026 to 2027	2027 to 2028	2028 to 2029	2029 to 2030	Total
Total windfalls with permission (A)	767	151	33	30	20	1,001
Of which windfalls that are on sites of 20 or less dwellings and not on garden-greenfield land (B)	427	14	5	0	0	446
Basic windfall projection (C)	116	116	116	116	116	580
Total eligible net windfalls (D)	116	14	5	0	0	135
Adjusted windfall projection (E) (C-D)	0	102	111	116	116	445

3.11 Row B in the table above shows the projected year of completion and sum total of projected completions of sites which have extant planning permission, on sites of 20 or less dwellings, not on garden-greenfield land, and also remaining incomplete as of the 31st of March 2025. These sites are forecast for completion in the five year period 1st April 2025 to 31 March 2030 and total 445dwellings.

3.12 Because there are more permissions (total eligible net windfalls) than the basic windfall projection (the 116 per year in row C in the table above) in 2025/26, we cannot increase our predicted number of completions in that monitoring year. Therefore, the adjusted additional windfall in 2025/26 is nil.

3.13 In the periods 2026/27 through to 2029/30, however, the basic windfall projection is more than the total number of permissions – so we can add the difference to these two sets of figures (the adjusted windfall projection in row E) to our predictions for these monitoring periods. This means that using the Exeter HMA HELAA methodology we can include **445** additional dwelling windfalls in the forecast of deliverable housing supply in the next five years.

4 Plan period completions and trajectory 2013-2031

Overall completion forecasts/projections and trajectory

4.1. Based on the various elements of future supply considered in Section 3 of this report, the tables below set out the annual forecasts of net housing completions for all housing supply for the remainder of the plan period from 1 April 2025 to 31 March 2031.

4.2. This is not intended to give a precise year-on-year prediction of how many new homes will be built each year, but it is the result of applying Planning Practice Guidance on identifying deliverable housing for major and non-major sites, and from applying the HELAA methodology for forecasting windfall development. This gives an overview of the potential future pattern of development.

TABLE 12: Annual projected housing completions for 2024/25 to 2030/31

Year	Total Commitments	Non-Major / Small sites	Major / Large sites (excluding Cranbrook expansion sites)	Cranbrook expansion zones	Exeter HMA HELAA calculated additional predicted windfalls	Total projections
2025/26	1,157	513	644	0	0	1,157
2026/27	701	0	676	25	102	803
2027/28	581	0	481	100	111	692
2028/29	573	0	283	290	116	689
2029/30	635	0	155	480	116	751
2030/31	767	129	193	445	116	883
2031/32	425	0	15	410	116	541
Total	4,839	642	2,447	1,750	677	5,516

TABLE 13: Housing Supply – Five Year period and to March 2031

Year	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
Totals	1,157	803	692	689	751	883	541
	4,092					**Projected five year housing delivery for 2025/26 to 2029/30**	

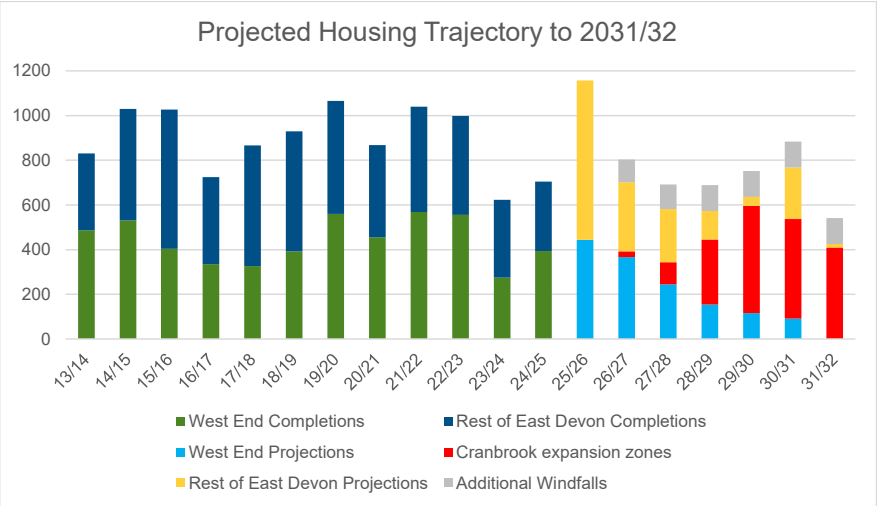
4.3. The net number of deliverable dwellings in the five years from 1 April 2025 to 31 March 2030 is **4,092** as shown in above. This is the figure used to calculate the five year housing land supply position at the 2025 monitoring point (see Section 5 of this report). The average yearly deliverable dwellings in the next five years is 818.

Forecast/Projected East Devon district housing trajectory to 2031

4.5 The graph below shows the breakdown of different sites making up the housing trajectory projected to 2031. This is not intended to give a precise year-on-year prediction of how many new homes will be built each year but is output from applying the methodology for calculating development and gives an overview of the potential future pattern of development.

Commented [MD14]: Looking at the data/graph would it help to add some text about (I presume it's the case) that no new local plan allocated sites are predicted to deliver completions (i.e. do not feature in the numbers) in the forward looking period. But to note that if they were to be built they would be in addition to those identified.

GRAPH 1: Projected housing trajectory to the 2031/32 monitoring point.



4.5 This trajectory is specific to the 2024-25 monitoring point and does not take into account the emerging local plan allocations. When developments are brought forward on allocations through the gaining of planning permission, dwellings within will then be projected. The local plan contains a local plan trajectory which, in addition to the data shown above, also displays the projected rate of completions on allocations.

4.6 The table below shows all the data used for the various components of supply and projections in the graph above.

TABLE 14: Data for overall housing trajectory graph

Period	West End Completions	Rest of East Devon Completions	West End Projections	Cranbrook expansion zones projections	Rest of East Devon Projections	Additional Windfalls	Total Comp/Pro
13/14	486	344					830
14/15	531	498					1,029
15/16	403	624					1,027
16/17	335	389					724
17/18	326	540					866
18/19	392	537					929
19/20	560	505					1,065
20/21	455	412					867*
21/22	568	471					1,039*
22/23	555	443					998*
23/24	274	349					623*
24/25	393	312					696*
25/26			444	0	713	0	**1157**
26/27			367	25	309	102	**803**
27/28			244	100	237	111	**692**
28/29			155	290	128	116	**689**
29/30			115	480	40	116	**751**
30/31			92	445	230	116	883

*After MHCLG adjustments for care home beds have been made

Natural England – River Axe phosphate levels

4.7 Due to Natural England advising that we should no longer grant planning permission for development that would increase the discharge of phosphates into the River Axe, 17 sites with outline / reserved matters planning permissions have been excluded from the forecast deliverable supply calculations. There is, however, potential for permissions to be granted if effective mitigation for nutrient neutrality is shown.

Commented [MD15]: Should this be "granted"? Do we have data on how many are 'held-up' by this constraint? Any merit in referencing the number?

4.8 The River Axe catchment area is shown below and can be seen to stretch into both Somerset and Dorset, outside of the East Devon District Council boundary.

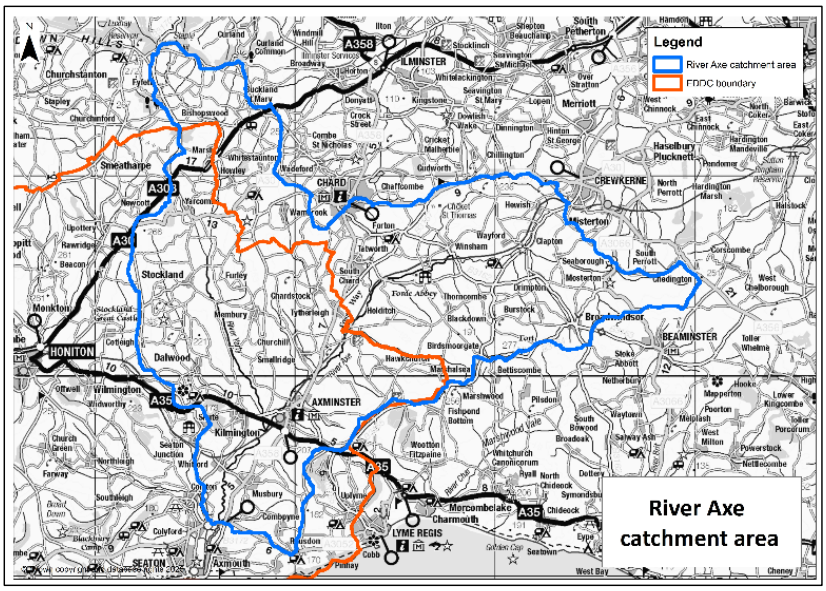


FIGURE 1: Map of River Axe catchment area

4.9 Government has signalled the potential for changes to legislation regarding nutrient neutrality and development. The Council will continue to monitor any future changes to legislation, planning policy and guidance regarding this matter.

5 Maintaining supply and delivery

Housing Delivery Test (HDT)

5.1 In the latest National Planning Policy Framework (NPPF), published December 2024, Paragraph 79 states a buffer is required dependant on previous achievement of housing supply.

5.2 *"To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below the local planning authority's housing requirement over the previous three years, the following policy consequences should apply:*

a) where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of underdelivery and identify actions to increase delivery in future years;

b) where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as set out in paragraph 78 of this framework, in addition to the requirement for an action plan;

c) where delivery falls below 75% of the requirement over the previous three years, the presumption in favour of sustainable development applies, as set out in footnote 8 of this Framework, in addition to the requirements for an action plan and 20% buffer."

5.5 This buffer is dependent on the results of the Housing Delivery Test (HDT). Rather than simply looking at what *can* be achieved over the following five years, the HDT checks what *has* been achieved over the previous three, with delivery of the full amount resulting in a score of 100%. The calculations are as follows.

$$\textbf{Housing Delivery Test (\%)} = \frac{\textit{Total net homes delivered over three year period}}{\textit{Total number of homes required over three year period}}$$

5.6 The number of net homes delivered is the national statistic for net additional dwellings over a rolling three year period, with adjustments for net student / other communal accommodation.

$$\textbf{\textit{Net homes delivered in a year}}$$

$$= \textit{Net Additional Dwellings National Statistic}$$

$$\textit{PLUS}$$

$$\frac{\textit{net increase in bedrooms in student communal accommodation in local authority}}{\textit{average number of students in student only households in England}}$$

$$\textit{PLUS}$$

$$\frac{\textit{net increase in bedrooms in other communal accommodation in local authority}}{\textit{average number of adults in households in England}}$$

5.9 For more information on the calculations, the HDT Measurement Rule Book can be found at:

https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book/housing-delivery-test-measurement-rule-book

5.10 The results of the sixth HDT (covering 2020/21 to 2022/23) were released in December 2024. East Devon District Council passed the test with a score of 118%, meaning no 20% buffer is required when calculating the 5 year housing land supply figure, the calculations are shown below in table 1:

https://www.gov.uk/government/publications/housing-delivery-test-2023-measurement

Commented [JC16]: @Joseph Dunnett Wasn't the sixth set of HDT results published Dec 2024 rather than 2023?

Commented [JD17R16]: Yes definitely, it is the next 2 HDTs (2023-24 to be published in 2025 and 2024-25 to be published in 2026) that may be delayed.

5.11 Figures used in the calculation of the Fifth Housing Delivery Test.

TABLE 1: Requirement and delivery 2020-2023

Number of homes Required			Total number of homes required
2020-21	2021-22	2022-23	
618	918	946	2,482
Number of homes delivered			Total number of homes delivered
2020-21	2021-22	2022-23	
904	1,039	996	2,940

TABLE 2: Housing Delivery Test calculation and results 2020-2023

Total number of homes required	Total number of homes delivered	Housing Delivery Test: 2023 measurement	Housing Delivery Test: 2023 consequence
2,482	2,940	118%	None

5.12 Previous results, including the sixth HDT detailed above were:

First HDT (2015/16 to 2017/18)	149%
Second HDT (2016/17 to 2018/19)	121%
Third HDT (2017/18 to 2019/20)	122%
Fourth HDT (2018/19 to 2020/21)	123%
Fifth HDT (2019/20 to 2021/22)	126%
Sixth HDT (2020/21 to 2022/23)	118%

5.13 It should be noted that the 2024 and 2025 HDT are yet to be published but the following comment on the progress has been published:

"Stakeholders will be aware that we are currently operating to a delayed publication timetable for HDT as a result of planning reforms and associated consultations. We recognise that authorities, developers and others rightly expect the HDT to be published according to a regular timetable. We are therefore, considering options for expediting future HDT collections, including the possibility of combining the data collections for the 2024 and 2025 HDTs. We will update in due course."

Buffer ensuring choice and competition

5.14 The NPPF sets out that to allow fair choice and competition or previous undersupply, buffers should be added. Paragraph 78 looks to:

5.15 *"The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:*

a) 5% to ensure choice and competition in the market for land; or

b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply; or

c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework, and whose annual average housing requirement42 is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance."

Commented [JD18]: There is a need to add a 5% buffer to the 5 year requirement (not the yearly target)

5.16 The HDT shows there is no significant under delivery of housing so no 20% buffer is needed. However, to ensure choice and competition, a 5% buffer is required to be added to the annual target.

5.17 The resulting 5 year housing land supply position is used in 2 ways, for plan making and decision making. Paragraph 11 of the revised NPPF states:

5.18 *"Plans and decisions should apply a presumption in favour of sustainable development.*

*For **plan-making** this means that:*

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

*For **decision-taking** this means:*

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination."

6 District Five Year Housing Land Supply Position

6.1 The aim of demonstrating a five year land supply is to prove that there is enough housing coming forward to meet requirements. On top of this, the current Government is seeking to increase housing delivery in the immediate future by requiring councils to demonstrate a minimum of 20% in places where delivery has persistently been below requirements.

6.2 This council does not have a pattern of persistently delivering below housing requirements (when measured against Local Plan targets or, more so, Government Housing Delivery Test numbers).

6.3 The adopted Local Plan has a housing requirement of 17,100 new homes for the 2013-2031 plan period, equivalent to an average of 950 dwellings per annum. However, now the plan has been adopted for more than five years, we refer to latest Government guidance. The latest guidance indicates we should be using a baseline figure of 1,156 dwellings per annum.

6.4 Working from the baseline figure of 1156 the following calculations outline the process to finding East Devons 5YHLS figure. This includes both the HDT result showing no need for a 20% buffer and the required 5% buffer to ensure choice and competition.

TABLE 15: Five year requirement – Split between West End and Rest of East Devon

East Devon and sub-area housing requirement for 1st April 2025 to 31st March 2030					
	Calculation	**Rest of East Devon**	**West End**	**EDDC Total**	**Supply sources**
A		442	714	1,156	**Local housing need**
B	Ax5	2,210	3,570	5,780	Five year requirement target
C	A/20	22	36	58	5% buffer
D	B+C	2232	3606	5,838	Five year requirement target with 5% buffer
E	D/5	446	721	1,168	Annual Requirement

TABLE 16: Five year supply – Split West End and Rest of East Devon

Supply sources at 31 March 2025 with realistic prospects of delivering dwellings 1st April 2025 to 31st March 2030					
	Calculation	**Rest of East Devon**	**West End**	**EDDC Total**	**Supply sources**
F		1,427	1,325	2,752	Extant permissions
G		0	895	895	Cranbrook Plan DPD expansion zones without Reserve Matters or Unconsented**
H		170	275	445	Future windfalls
I	F+G+H	1,597	2,495	4,092	Total five years deliverable supply
J	D-I	635	1,111	1,746	Five year shortfall figure
		SHORTFALL	**SHORTFALL**	**SHORTFALL**	Shortfall or Supply
Five year housing land supply position at 31st April 2025, the 2025 monitoring point					
K	H/C	**3.58**	**3.46**	**3.50**	**Years of land supply**

* Annual requirement based on Local Housing Need (standard method)
****** Planning applications on 3 of the 4 Cranbrook expansion areas received Planning Committee 'Resolution to grant approval' after the 2023 Monitoring Point

Five year housing land supply position – EDDC Total

6.5 At the 31st of March 2025, East Devon District Council can demonstrate a **3.50** year housing land supply position against the annual requirement of **1,168**. The total number of dwellings deemed deliverable in the five year period being 4,092 dwellings. Comparing the 4,092 forecasted five year supply (including dwelling equivalents from care homes) to the 5,838 net dwellings five year requirement indicates a district supply **shortfall of 1,746** dwellings.

6.6 Therefore, EDDC cannot demonstrate a five year housing land supply of deliverable sites as of the 31st of March 2025.

Housing land supply position – West End and Rest of East Devon split

6.7 The adopted local plan encompasses a spatial strategy that includes two sub areas – the West End of East Devon and the Rest of East Devon. The 1,168 annual requirement shown above is split into the two sub areas, and a five year housing supply position is calculated for the two sub areas as follows.

- The adopted local plan requirement figure of 17,100 is split into the two sub areas:
  - 10,563 dwellings in the West End (61.77% of the total)

    This is based on the 10,563 supply-side policy figure in Strategic Policy 2 in the adopted Local Plan. Note the supply forecast in Appendix 2 of the adopted local plan had a NIL windfall allowance for the West End.
  - 6,537 in the Rest of East Devon (38.23% of the total)

    This is based on the residue of the district requirement figure after subtracting the West End supply policy figure. Note: The aggregated supply side policy figure of 5,830 for the Rest of East Devon in Strategic Policy 2 in the adopted Local Plan excludes the windfall allowance for the Rest of East Devon that is shown in Appendix 2 of the adopted Local plan).
- The Sub Area proportions of the district figure of 1,168 in the table above are therefore:
  - West End 61.77% (i.e. 721 p.a.)
  - Rest of East Devon 38.23% (i.e. 447 p.a.)

6.8 Consequently, applying the five year housing land supply calculation in 0 table above split into the two sub areas results in the following five year housing land supply positions:

- West End 3.46 years supply
- Rest of East Devon 3.58 years supply

6.9 The calculation shows the impact of the West End sites on supply. They are the principal reason for the council being unable to demonstrate a district five year housing land supply position. However, action to rectify the sub area position has occurred, namely:

- The Cranbrook Plan DPD was adopted.
- In three of the four Expansion Areas, there are recent planning applications where Planning Committee resolved to grant planning approval, subject to S106 agreements.
- Master planning is underway for the creation of Marlcombe, a new town situated in the West End.
- Work is ongoing on the new Local Plan which is currently nearing 2nd Reg 19 stage which allocates a range of sites for housing and mixed use development across all of East Devon.

6.10 Details on the five year housing land supply figure calculation can be found online at:

https://www.gov.uk/guidance/housing-supply-and-delivery

6.11 The results and conclusions in this document supersede all previous East Devon Housing Monitoring Updates reports regarding the five year housing land supply position.

7 Delivery compared to adopted plan trajectory

7.1 The table below compares the 2025 monitoring point completions and projections with the adopted East Devon Local Plan 2013 to 2031 housing trajectory over the plan period. The difference in delivery can be seen annually and are cumulatively totalled to show the difference between the local plan trajectory, the completions, and most recent projections.

TABLE 19: Comparison of Local Plan and projected trajectories

Period	2025 monitoring point total annual completions and trajectory Projections	Local Plan 2013 -31 trajectory - Annual Completions / Projections	Over / Under delivery compared to local plan trajectory	Cumulative difference between Local Plan 2013 -31 trajectory and 2025 monitoring point data
13/14	830	824	6	6
14/15	1,029	1,089	-60	-54
15/16	1,027	1,191	-164	-218
16/17	724	1,261	-537	-755
17/18	866	1,455	-589	-1344
18/19	929	1,464	-535	-1879
19/20	1,065	1,287	-222	-2101
20/21	867*	1,553	-686	-2787
21/22	1,039*	1,295	-256	-3043
22/23	998*	1,092	-94	-3137
23/24	623*	1,041	-418	-3555
24/25	**705***	**1,012**	**-307**	**-3,862**
25/26	**1157**	**830**	**327**	**-3,535**
26/27	**803**	**691**	**112**	**-3,423**
27/28	**692**	**566**	**126**	**-3,297**
28/29	**689**	**551**	**138**	**-3,159**
29/30	**751**	**551**	**200**	**-2,959**
30/31	**883**	**565**	**318**	**-2,641**
TOTAL	**11,445**	**18,318**		

*Assumes MHCLG adjustments for care home beds have been made

Commented [JC19]: @Joseph Dunnett The wrong MP is highlighted in white

7.2 The table above clearly shows that the delivery forecasts in the Local Plan trajectory are now not expected to be achieved. Those forecasts were ambitious. They also pre-date the latest Planning Practice Guidance on Housing supply and delivery. The Covid 19 pandemic impacted on delivery in 2020/21. Furthermore, delivery on strategic allocations has been delayed, notably due to:

- the lack of funding for the Axminster relief road and now the nutrients neutrality constraint has prevented the previously forecast early delivery of the strategic allocation at Axminster (in the Rest of East Devon) between 2017/18 and 2025/26;
- the timing of the Cranbrook Plan DPD inspector's report, and subsequent plan adoption, which has led to longer forecast lead in times for applications in the Expansion Areas.

7.3 In producing the trajectory for the 2025 Housing Monitoring Update, the council is aware that work is currently in progress in on the emerging East Devon Local Plan 2020 to 2042. The NPPF requires the Council to demonstrate that the emerging plan has a five year supply at the point of plan adoption.

APPENDIX 1 - Local housing need calculation

Government guidance on calculating local housing is set out in the Planning Practice Guide: Housing and economic needs assessment. Please see the guidance for further explanation. The Council has applied this guidance to calculate the local housing need for East Devon for use in the five year housing land supply calculation as at the 2025 monitoring point. The calculations are as follows:

TABLE 20: Average annual increase in households

EAST DEVON ONS HOUSEHOLD PROJECTIONS		
A	Projected households 2025	71,420
B	Projected households 2035	80,724
C	Projected increase in households 2025-2035 (B-A)	9,304
D	Annual projected increase in households 2025-2035 (C/10)	930.40

TABLE 21: 2025 affordability ratio

EAST DEVON ONS AFFORDABILITY RATIO		
	House price to workplace-based earnings ratio (published March 2025)	
E	East Devon median house prices five year average up to 2024	316,800
F	East Devon median workplace earnings five year average up to 2024	32,330
G	East Devon affordability ratio five year average up to 2024 (E/F)	9.86

TABLE 22: 2025 Monitoring Point East Devon Local Housing Need

EAST DEVON LOCAL HOUSING NEED		
H	Adjustment factor (PPG method. Calculations detailed below)	1.9234
I	Annual projected increase in households 2025-2035 (*D*)	930.4
J	Local Housing Need (annual) *(I * H)*	1156

TABLE 23: Adjustment Factor Calculations

Calculation of Adjustment Factor (based on PPG standard method)	
East Devon adjustment factor is calculated as follows: (((9.86 – 5) / 5) * 0.95) +1)	
9.86 – 5 =	4.86
4.86 ÷ 5 =	0.972
0.972 x 0.95 =	0.9234
Adjustment factor for East Devon. 0.9234 + 1 =	1.9234