

Date of Meeting Tuesday 6 September 2022

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

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## UPDATE REPORT

### Site Selection for the emerging East Devon Local Plan 2020 to 2040 – interim findings at Tier One and Tier Two settlements

#### Report summary:

This update report follows on from Members consideration of the site assessment work at the Tier 1 and Tier 2 settlements at their meeting of the 9<sup>th</sup> August. This report seeks to respond to Members queries raised at that meeting about the role of any proposed new community in addressing the identified shortfall in housing sites and a request for an update on work on the new community proposals. Members also sought advice on the role that redevelopment of Exmouth town centre may play in addressing the shortfall as well. The report concludes that neither of these options could materially boost housing supply from that set out in the report to the 9<sup>th</sup> August meeting.

This report acts as an update to the report to 9<sup>th</sup> August meeting an updated version of which is appended. This updated version seeks to address a couple of updates in light of additional information that has now come forward and should be used instead of that published in the agenda for the 9<sup>th</sup> August meeting which is now superseded.

Is the proposed decision in accordance with:

Budget Yes  No

Policy Framework Yes  No

#### Recommendation:

1. That Strategic Planning Committee recommend endorsement of the sites proposed as preferred allocations for development in this committee report.
2. That Strategic Planning Committee note the likely shortfall in housing sites identified within this committee report.
3. That Strategic Planning Committee identify which additional sites that have currently been assessed as '2nd best' sites they consider would be appropriate to include as preferred allocations in the draft Local Plan for consultation.
4. That Strategic Planning Committee advise of their views on the options for addressing the housing shortfall as set out at Paragraph 5.24 of the report.

#### Reason for recommendation:

To ensure that members provide clarity over the preferred approach that they wish to see taken in the proposed consultation draft of the plan. The consultation draft plan, officers would recommend, should set out a policy approach that ensures that sufficient land allocations are proposed to meet (and preferably exceed) the minimum levels of housing that the local plan should be seeking to accommodate. This approach can be refined through future consultation and

engagement before being finalised as the Council's proposed approach in the publication draft Local Plan in 2023.

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Portfolio(s) (check which apply):

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

**Equalities impact** Low Impact

**Climate change** High Impact

**Risk:** Low Risk;

**Links to background information** Item 8 of [Agenda for Strategic Planning Committee on Tuesday, 9th August, 2022, 9.30 am - East Devon](#)

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

Priorities (check which apply)

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

## Report in full

### 1. Background

- 1.1 Members have received and will have reviewed various reports in recent weeks that have highlighted and assessed potential housing sites across East Devon. These reference a 2<sup>nd</sup> new town, an urban extension north of Topsham and development at Tier 1 to 4 settlements.
- 1.2 In the local plan report to committee on 9<sup>th</sup> August 2022 members were alerted to the housing need numbers that are generated applying the Government methodology and the challenges that are faced in finding sufficient land to allocate for development to meet the quantified levels/need. In considering that report Members identified the significance of the role of a new community in meeting housing needs, the potential to bolster supply at any new community and sought an update on progress in considering options for a new community. An option of making better use of brownfield land in and around Exmouth town centre was also identified and officer's views were sought on this option. This report seeks to respond to these requests and highlights some updates to the site assessment work reported to the 9<sup>th</sup> August meeting.

## **2. New Community Update**

- 2.1 As Members will be aware a group of consultants led by CBRE have been appointed to among other things assess the options for a new community in the western part of the district. This work has been progressing with various assessments and evidence gathering taking place including transport modelling to understand the implications for the road network, investigations into utilities and infrastructure capacity, landscape sensitivity assessment work and landscape capacity assessments. In addition consultants have led a workshop with Members to understand aspirations for any new community and develop a criteria against which the options can be assessed.
- 2.2 The commission requires reporting on the consultant's findings and a recommendation of a favoured option for a new community in September. At the time of writing a draft report is expected shortly and a meeting has been arranged to discuss initial conclusions with officers. A further Members workshop is also being arranged. The consultant's report will form part of the evidence base to support the new Local Plan and a recommendation will be included within the draft plan for consultation on a preferred option for a new community for consultation.
- 2.3 At their meeting of the 9<sup>th</sup> August some Members questioned whether more homes could be delivered at a new community within the plan period to help to address the shortfall in housing sites identified in the report. In proposing the allocation of land to develop a second new community we have indicated that up to 2040 we might expect to see around 2,500 new homes built with further development happening after 2040 taking the size of the new town up to 8,000 new homes.
- 2.4 Experience at Cranbrook shows that there can be expected to be a lengthy time period between the early stages of plan preparation and germination of development ideas, to when actual local plans are adopted, planning applications are submitted, approvals are granted, infrastructure works are started and houses are completed. The picture is further complicated where multiple land owners are involved (as we will probably have for our new town) and even more so if the Council, and/or some other public body, wish to take a pro-active role in the delivery of the scheme. This is an approach the Council are positively exploring and should Members be minded to promote a new community through the draft Local Plan then considering delivery vehicles options forms a further part of the work that CBRE have been commissioned to undertake.
- 2.5 Given the 'lead in' challenges we might reasonably expect to see the first homes built in the year running from 1 April 2030 to 31 March 2031. This is less than nine years from now and experience from Cranbrook suggests this could be a realistic albeit quite challenging time scale. In the first year it might be expected that development starts comparatively slowly, we suggest a figure of 100 new homes being completed. Thereafter development rates can be expected to build up and drawing on experience from Cranbrook the delivery of 300 homes a year on average, for eight years from 1 April 2031 to 31 March 2040 is seen as a reasonable and realistic estimate. Figures for one year (2030 to 2031) at 100 new homes and eight years (2031 to 2040) at 300 new homes per year generates a total delivery of 2,500 new homes.
- 2.6 These figures seek to strike a balance between being ambitious and realistic as well as being mindful of experience elsewhere and what can reasonably be defended at the examination of the plan. It is considered that it would not be realistic or defensible to suggest that more than 2,500 homes could be delivered at a new community within the plan period. Indeed Members

are reminded that delays in the delivery of Cranbrook compared with projections at the time of the 2007 Local Plan led to the Council not having a 5 year housing land supply for a period in the early 2010's. Setting unrealistic projections now could have similar consequences later on.

### **3. Other options for accommodating housing growth**

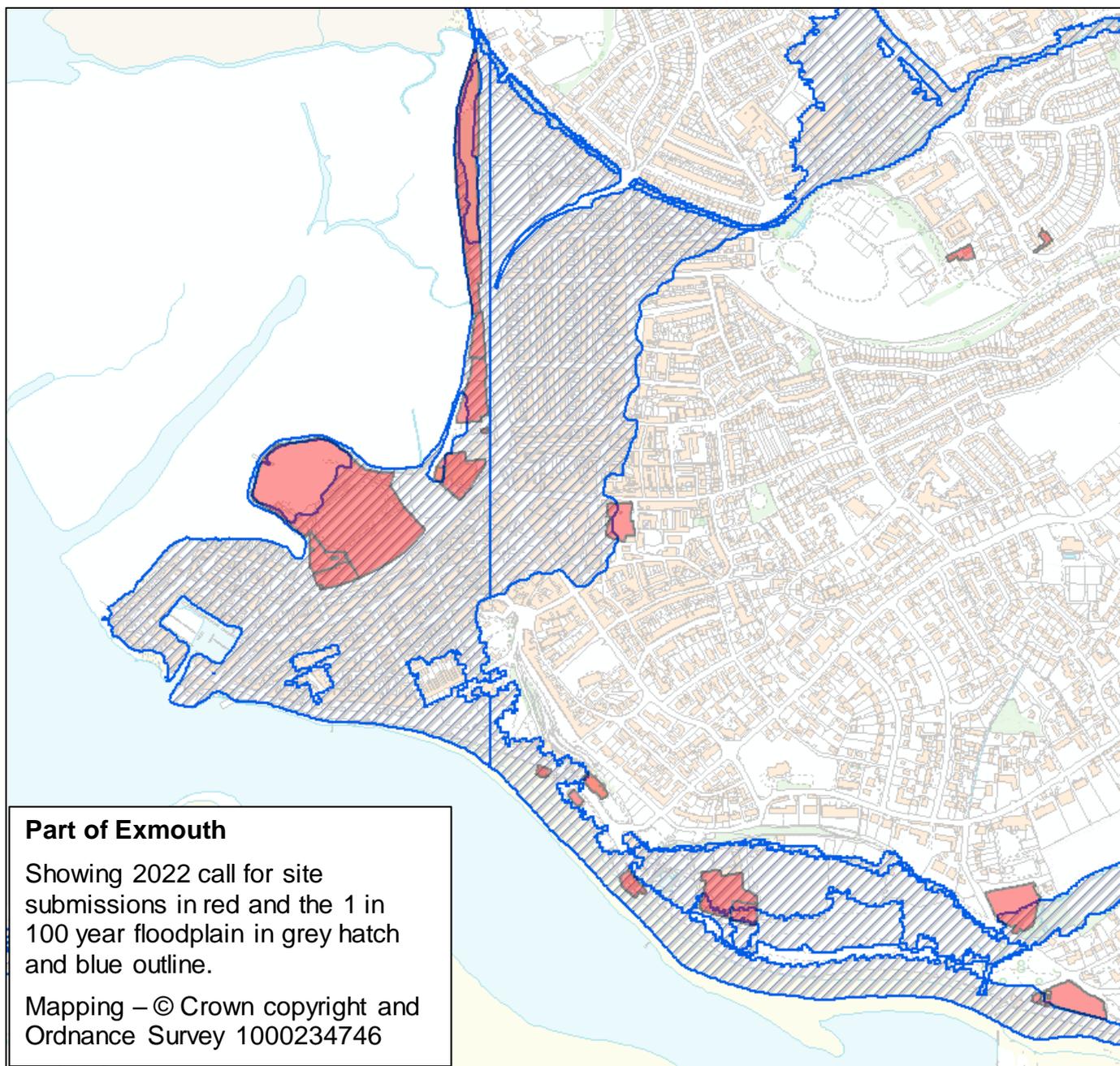
3.1 In the Committee report to the 9 August we identified, at Paragraph 5.24, a series of Options to address the potential shortfall in housing numbers. Options 1, 2 and 3 were:

- Option 1 - Allocate additional '2nd best' sites at Tier 1 and 2 settlements;
- Option 2 – Provide for modest additional housing at Tier 3 and 4 settlements;
- Option 3 – Focus strategic scale development at selected Tier 3 and 4 settlements.
- Option 4 suggested looking to increased housing densities.

We address these through earlier commentary in this report.

3.2 Option 5 advised of looking again at urban intensification options and Members at the 9<sup>th</sup> August Committee meeting specifically identified Exmouth Town Centre as a potential opportunity to achieve this. In part we have started to address this through work undertaken in looking at submissions made through the 2022 Call for Sites. Though it should be noted that many of the submissions made were either not new sites (i.e. they had already been submitted) and/or they were not urban sites – many are Greenfield sites on the edge of settlements. Work undertaken for the urban capacity study and the brownfield register also give us a good awareness of available land within urban areas including Exmouth.

3.3 It should be noted that quite a number of the newly submitted sites from the 2022 Call for Sites pose some major challenges to development, not the least in respect of flooding. To illustrate the point the map below shows the south western side of Exmouth, centred on the town centre and surroundings and shows new call for sites in red. The 1 in 100 year floodplain is shown in hatched grey with a blue outline.



3.4 The map clearly shows that many of the new 2022 call for site submissions in Exmouth (most in Exmouth fall on this map extract) are partly or fully in the floodplain. This places considerable challenges on securing a residential planning permission and justifying a local plan land allocation. For such sites to come forward we would need to establish that reasonable alternative options do not exist, our site assessment suggests this is not the case. In any event allocating land for housing that is at significant risk of flooding does not sit with addressing climate change and the impacts of climate change. It is also worth noting, as shown on the map, that many of the submitted sites are small and if they do come forward for housing growth, specifically those outside the floodplain, they will make limited contribution to housing development.

3.5 It is also worth noting that there has been wider discussion around possible regeneration options on land that has not come forward through the call for sites. Regeneration or redevelopment options might typically apply in town centre or edge of centre locations. But as the map of Exmouth shows, for Exmouth at least, flooding considerations are a significant constraint. Suggestions, for example, such as redeveloping the Magnolia Centre with new

housing provision incorporated would 'fall foul' of flooding concerns as the whole of the Magnolia centre falls in the floodplain. This specific planning observation ignores, of course, what this or any land owners aspirations may be. If Members wished to take a proactive approach to redevelopment of brownfield sites and use powers such as compulsory purchase then Members need to be aware that these are very resource intensive, time consuming and costly with no guarantee of success. There are however very limited opportunities within Exmouth town centre with or without a willing land owner due to the flooding issues.

- 3.6 Notwithstanding the above comments looking further at the above options would not be impossible, but it would most likely delay plan production, it would need time, skills and expertise that goes beyond that of the planning policy team and it far from assured that it would deliver useful or meaningful outputs.

#### **4. Updates to 9<sup>th</sup> August Site Selection Report**

- 4.1 Following the 9 August 2022 committee report the assessment work presented at that meeting has been updated to reflect further information that came forward at that meeting and subsequently. Appended to this report is the updated version of the work but for Members information the updates relate to the following:
- a) At Exmouth we suggested that Site Exmo\_20 (as well as GH/ED/76), land on the eastern side of Exmouth, should feature as a 2nd Best allocation for development for 750 homes. After the agenda was published, and at the committee meeting, we heard a presentation from agents acting for the/a land owner advocating a much more modest scheme of one field for 75 dwellings though with potential to also build in an adjoining field to take the total to 150 homes. We have to adjust 2nd Best potential capacity down to 150 dwellings to reflect the land owner's submission. This impacts on the Exmouth total.
  - b) Also at Exmouth we highlighted the potential for Land west of Hulham Road (South East of Point in View), from the 2022 Call for Sites, to be allocated. However, on closer assessment it is clear that this site falls within and not adjacent to a designated Historic Park and Garden and as such recommendation is now that it should not be allocated, 15 homes are removed from the preferred site total.
  - c) For land North of Topsham we have previously noted potential to potentially accommodate up to 850 new homes and this figure featured in past calculations. However, being more prudent and conservative, and unless evidence comes forward to the contrary, we would suggest the capacity figure should be reduced to 650 to accord with HELAA assessment calculations.
  - d) On the Sidmouth Map we showed site Sidm\_13. Officers did not provide formal commentary on the potential suitability of this site for residential development as it was deemed too remote from the built up parts of Sidmouth to warrant formal assessment. The person proposing development (new houses and a hotel) on the site shown on the map to committee as Sidm\_13 has raised concerns, however, that this is not the full extent of the site submission. The full extent of land submitted featured in a 2017 call for site submissions, the site shown as Sidm\_13 was assumed to be the extent of a 2021 call for site submission and in assessment work this was assumed to have

superseded the 2017 submission. The land owner has now provided clarification that Council officer interpretation of matters did not align with submission intent and expectation. HELAA records are to be adjusted to rectify the situation. The full extent of Sidm\_13 extends closer to the built up area of the town than previously and so a detailed assessment of the site is now included in the report.

- e) The housing figures quoted in the report have been updated to reflect the above mentioned changes.

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Report to: **Strategic Planning Committee**

Date of Meeting Tuesday 9 August 2022

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



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## **Site Selection for the emerging East Devon Local Plan 2020 to 2040 – interim findings at Tier One and Tier Two settlements**

### **Report summary:**

Following on from the Strategic Planning Committee held on 12<sup>th</sup> July 2022, this report provides further detail on the process for considering which sites should be allocated for housing development in the emerging Local Plan. The emphasis on the work undertaken is for housing provision, but also references are made to some non-housing uses where a mixed use development would be appropriate. Non-housing development and land allocations will be addressed in subsequent reports to committee.

A methodology explains how sites are identified, assessed, and proposed to be selected for allocation, or not. The interim findings for Tier One and Tier Two settlements contains the assessment of sites at these places, detailing those sites which are preferred to allocate in the Local Plan, and those that are not, with reasons why. However, these preferred sites alone (taking into account assumptions about development elsewhere in the District) will not be sufficient to meet overall housing requirements and this report highlights options for allocating additional land at towns (on what we term '2<sup>nd</sup> best' sites) that could address the shortfall. Finally, the report outlines related work on considering sites to allocate elsewhere in East Devon over the coming weeks.

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

Budget Yes  No

Policy Framework Yes  No

### **Recommendation:**

1. That Strategic Planning Committee recommend endorsement of the sites proposed as preferred allocations for development in this committee report.
2. That Strategic Planning Committee note the likely shortfall in housing sites identified within this committee report.

3. That Strategic Planning Committee identify which additional sites that have currently been assessed as '2<sup>nd</sup> best' sites they consider would be appropriate to include as preferred allocations in the draft Local Plan for consultation.
4. That Strategic Planning Committee advise of their views on the options for addressing the housing shortfall as set out at Paragraph 5.24 of the report.

### **Reason for recommendation:**

To ensure that members provide clarity over the preferred approach that they wish to see taken in the proposed consultation draft of the plan. The consultation draft plan, officers would recommend, should set out a policy approach that ensures that sufficient land allocations are proposed to meet (and preferably exceed) the minimum levels of housing that the local plan should be seeking to accommodate. This approach can be refined through future consultation and engagement before being finalised as the Council's proposed approach in the publication draft Local Plan in 2023.

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Portfolio(s) (check which apply):

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

**Equalities impact** Low Impact

**Climate change** High Impact

**Risk:** Low Risk;

**Links to background information** [East Devon Local Plan – Update on timetable for production, SPC report 12.07.22](#) [Item 112, 2022 East Devon HELAA, SPC 03.05.22](#) [The Role and Function of Settlements – Final Draft, October 2021](#)

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

Priorities (check which apply)

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

## **Report in full**

### **1. Background**

- 1.1 One of the most important aspects of producing a Local Plan is allocating sites for new development. Members will recall that the last Strategic Planning Committee (12<sup>th</sup> July)

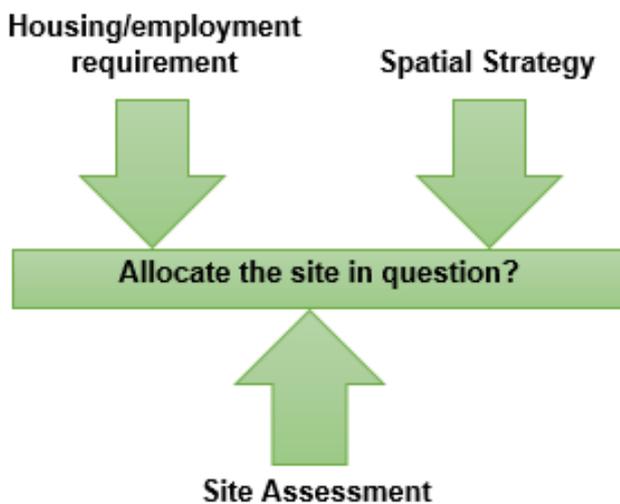
discussed a report on the timetable for production of the East Devon Local Plan, which included an overview on how potential development sites are being assessed, along with a timetable for considering possible site allocations at future SPC meetings. The report recommended that findings for the six main towns (Tier One and Two, excluding Cranbrook) are presented at SPC on 9<sup>th</sup> August, the small towns and villages (Tiers Three and Four) at SPC on 6<sup>th</sup> September, and finally the proposed new settlement and sites close to Exeter at SPC on 4<sup>th</sup> October alongside the Draft Local Plan itself. This recommendation was endorsed though noting that the volume of overall work may necessitate additional committee meetings in September. The opportunity for developers and site promoters to make presentations on their sites was also agreed to form part of these meetings.

- 1.2 This report presents further detail on the methodology for selecting sites for allocation and, consistent with the timetable outlined above, contains the initial site findings for the six main towns (i.e. Tier One and Two, excluding Cranbrook as development here is being considered through the emerging Cranbrook Plan).

## **2. Methodology**

- 2.2 A Site Selection Methodology has been prepared and this forms Appendix 1 to this report. The methodology provides further detail on the process followed for identifying, assessing and selecting sites to be allocated in the Local Plan. There are four stages in this process, as outlined below:
  - Stage 1: 'Site identification' is where a 'long list' of potential sites is collated. The Housing and Employment Land Availability Assessment (HELAA) is the main source of sites to be considered for potential inclusion in the Local Plan, though other sources include the Urban Capacity Study, Brownfield Land Register, sites that may have been submitted through consultation exercises and current Local Plan allocations where a planning application has not been submitted (often these other sources feature as HELAA submissions).
  - Stage 2: 'Site sifting' takes the long list of sites identified in Stage 1, and applies sifting criteria to ensure that only 'reasonable alternatives' are considered further. These criteria include the site must have been assessed as 'suitable, available and achievable' in the HELAA (excluding Cranbrook which is subject to its own Plan); is located within or adjacent to settlements in Tiers One to Four in the settlement hierarchy; and do not already have planning permission. It should be noted that a small number of sites that did not pass this test have been included in the assessment if or where it was considered there could be potential to overcome constraints noted by the panel.
  - Stage 3: 'Site assessment' will be undertaken for all sites that make it through the sifting stage. This assesses each site against a range of planning issues, such as landscape, historic environment, ecology considerations, access to jobs and services and relevant planning history.
  - Stage 4: 'Site selection' considers which sites to allocate in the Local Plan. This stage balances top-down strategic issues relating to the Local Plan district-wide housing/employment requirement and the spatial strategy for the distribution of development, with the specific factors in the site assessments – summarised in the following diagram.

**Figure 1: Site selection process**



- 2.3 Sites that perform well against these three interlinking factors should be allocated for development; whilst sites that do not perform as well as others should not be selected for allocation.
- 2.4 We are working towards a full Site Selection report which will explain whether each site should be allocated, or not, with reasons why, based upon the housing/employment requirement, spatial strategy and site assessment. This committee report sets out current findings on all those sites assessed at stage 3 of the above methodology and a few that did not pass stage 2 but where constraints could potentially be overcome. The emphasis is currently on housing allocations albeit reference is made in some cases to where a mixed use development would be appropriate or where an existing employment site is being considered reference may be made to its retention. A further report will, however, be brought to Members in due course focusing on employment land and considering employment only allocations and how employment and other uses are incorporated into mixed use allocations.
- 3. Agent/owners presentations**
- 3.1 Members will recall that at the previous committee meeting it was agreed to invite agents and site promoters/owners to present on major sites of 10 or more dwellings that form an officer's preferred allocation or are considered by officers to be a "maybe" site that is not preferred but could potentially be acceptable. For this new work relevant parties will be invited to present and a schedule drawn up of presentations which will be published alongside this agenda in due course. At the time of writing invitations have been sent out to those who qualify for a presentation slot and a schedule of presentations will be published prior to the meeting.
- 4. Site Selection report – Interim findings at Tier One and Tier Two settlements**
- 4.2 Appendix 2 of the report contains the assessment of each site at Tier 1 and 2 settlements, and identifies those which are preferred for allocation in the Local Plan, alongside those that are recommended not to be allocated, with reasons why. However it should be noted that we have also included in this committee report a further category which we term '2nd best' allocation choices. These are sites that typically will have some clear and significant constraints or limitations to development which mean that they do not form a preferred option. They are however highlighted as sites where the issues are not necessarily absolutes and where allocating them may be justified in the absence of better sites or more appropriately located sites to meet the housing need.
- 4.3 If there were sufficient sites that officers consider to be clearly appropriate for allocation then we would not be suggesting that we look to potentially allocate these '2nd best' site options. But we do not have this luxury and as such we highlight such potential allocations in order to

address possible housing shortfalls though we do also, further in in this report, highlight other options (if selected most likely in conjunction with additional allocations) that might address housing shortfalls.

4.4 This work is described as 'interim' for the following reasons:

- i. As explained in the May SPC report for HELAA part 1 (see background information link above), the HELAA part 2 needs to be completed. This will consider new sites submitted in the 2022 'call for sites', employment sites from 2017 and 2021, and sites from other sources (e.g. Urban Capacity Study, current Local Plan allocations not yet delivered). We show 2022 call for sites in maps in this report but they have not yet been given unique reference numbers. When the HELAA is completed, we will have a 'full' list of sites that are 'suitable, available and achievable' and can therefore be considered at Stages 1 and 2 of the Site Selection process. In this report we make comment on the potential for allocating new site submissions for development, for example from the 2022 call for sites, but observations are made in the absence of complete information and without the benefit of Panel consideration of sites. Perhaps of most importance is the absence of commentary from Devon County Council, as the relevant Highway Authority (for most sites) on whether an acceptable highway access to the site can be secured.
- ii. A key factor in knowing whether to allocate a site is the district-wide housing requirement. The Local Plan should meet objectively assessed needs for development, and site allocations are an important way of doing this. Of course, we will not know whether we have identified sufficient allocations to help meet needs until all settlements in Tiers One to Four (plus those in a new community and on the western side of the District) have been assessed, though in this report we do make some working assumptions based on the working draft local plan that was first considered by committee late last year.

4.5 Stage 1 of the site selection process considered over 550 sites, the majority sourced from the East Devon HELAA part 1 (May 2022) but some (83 sites) from the GESP HELAA. This long list was then 'sifted' at Stage 2, resulting in around 240 sites that are considered to be reasonable alternatives with a prospect of being allocated for development at Tiers One to Four of the settlement hierarchy, adjoining a business park, on the edge of Exeter, or with potential to help deliver a new settlement. Of this total around 80 sites are located in Tiers One and Two, and are presented in the appended 'Site Selection – interim findings at Tier One and Tier Two settlements'. The key findings i.e. proposed site allocations, along with those not currently favoured as allocations and those seen as '2<sup>nd</sup> best' choices are set out by settlement below with the full assessment of each site by town available in Appendix 2.

4.6 For each town in Tiers 1 and 2 (set out further on in this committee report) we provide some general introductory commentary in respect of the town including around matters of potential strategic suitability for development as well as highlighting some of the major constraints, especially environmental, that exist. In terms of suggesting '2<sup>nd</sup> best' sites as possible allocations we have taken account of potential strategic suitability for development at a town as well as levels of housing proposed more generally on preferred sites. Therefore '2<sup>nd</sup> best' site choices at some towns may, if taken on site characteristics alone, differ in development suitability compared to sites in other towns. However taking strategic planning considerations into account may 'elevate' or potentially 'demote' sites in terms of their potential suitability for development.

4.7 Amongst the environmental constraints the AONBs in East Devon are particularly significant. To respond to strategic planning considerations, in respect of suitability of some towns for development (especially bearing in mind limitations on preferred sites), we have suggested a number of '2<sup>nd</sup> best' allocation choices (some of a larger scale) that fall within AONB boundaries. We do so in recognition of the challenges this presents and would specifically highlight the National Planning Policy Framework (the overarching Government policy for planning) which states at paragraph 174:

***'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.'***

- 4.8 Potential development sites in the AONB should be carefully considered with regard to this guidance. Some '2nd best' sites identified are extremely challenging in this context and would only be appropriate if Members felt that sufficient growth in a town or the District could not be achieved without their allocation or that allocation is so significant, in locational or other terms, that it outweighs negative impacts.

## **Exmouth**

- 4.9 Exmouth is by some way the largest town in East Devon and contains more services and facilities than any other East Devon town. It is the only town that attains the Tier 1 status. There may be felt to be a strategic case for higher levels of development in Exmouth though it is also recognised that the town is environmentally constrained, specifically including by the proximity of the East Devon AONB and by nationally important biodiversity designations (the Pebblebed Heaths and the Exe Estuary). Also the coast and Exe estuary to the south and west constrain scope to grow in these directions. Preferred site allocations in Exmouth would provide only a comparatively limited number of new homes. However, given the strategic relevance of Exmouth we have identified potential for allocation of additional '2nd best' sites in the town that could accommodate a substantially greater number of new homes, though these sites are not without challenges.
- 4.10 Sites submitted at Exmouth are shown on the map on the following page along with tabulated commentary that follows.
- 4.11 The assessment work reveals that of the sites that were assessed 8 are identified as preferred allocations for development and these have the capacity to accommodate approximately 302 new homes. This is a very small number of extra dwellings to be secured through allocations given the overall size of Exmouth, the range of facilities it supports and its status as the only Tier 1 settlement in the emerging local plan settlement hierarchy.
- 4.12 Given the significance of Exmouth committee may regard it as a strategically sensible and desirable location to accommodate additional development through extra allocations. Although they are sites with clear constraints there were a number of sites in the town that are identified as Potential '2nd best' Allocation choices and committee may wish to look to these as possible allocation choices to help address the housing shortfall that has been identified. The identified '2nd best' choice sites would accommodate an additional 1,346 new homes. Beyond that, to increase provision, there would be a diminishing number of further possible site choices and it would result in development in increasingly sensitive locations or use of sites with significant constraints.

## Site assessment map for Exmouth

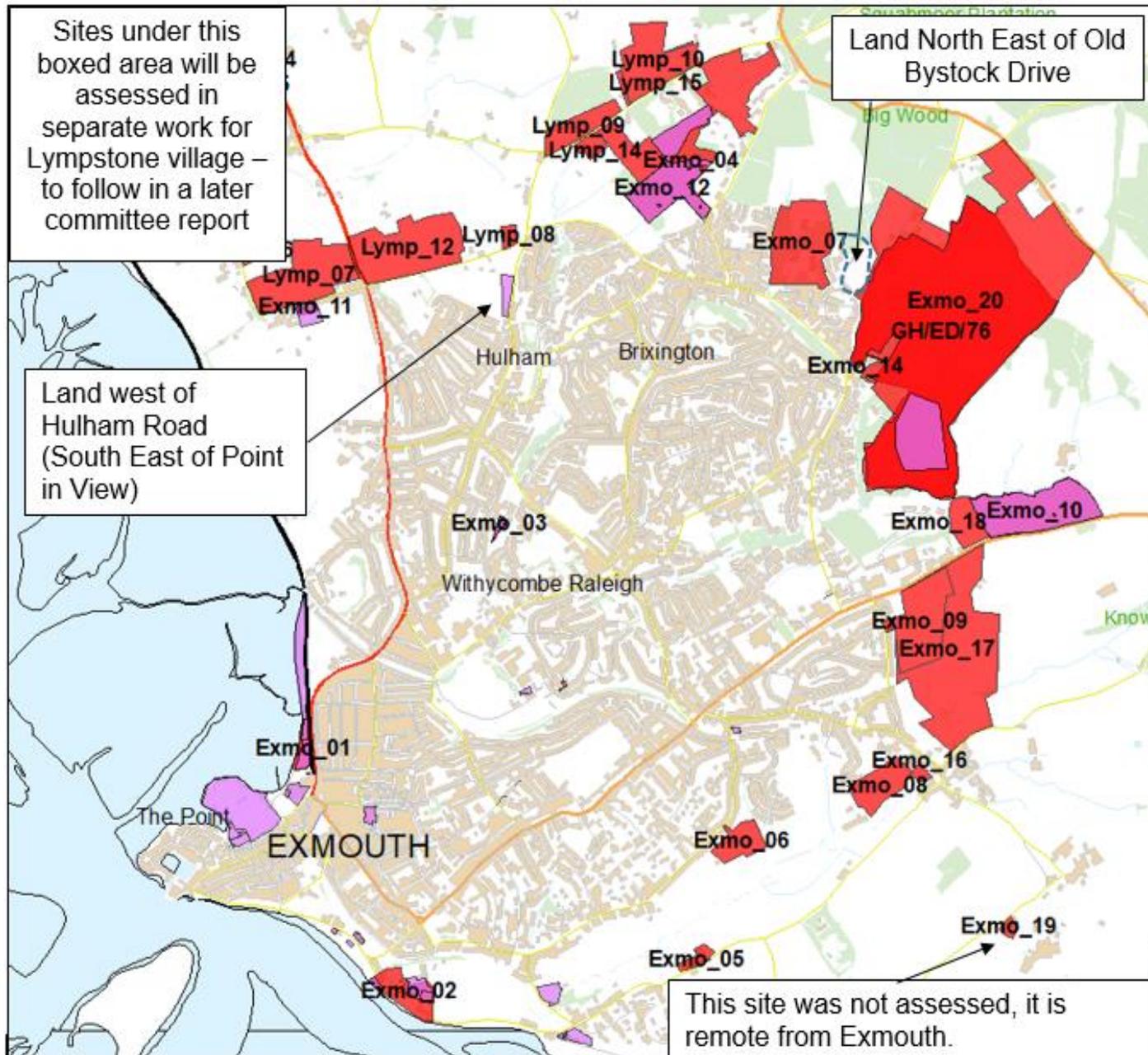
Sites coloured in Red (with some minor shading variations) are from calls for sites from 2017 and 2021.

Sites coloured in Purple are from the new Call for Sites from 2022.

It should be noted that there are a number of cases where submission sites overlay one another and there have been some re-submissions at various points. Mapping limitations mean that not all site specific boundaries are explicitly clear and Appendix 2 to this committee report should be referred to for a complete picture.

Mapping:

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A number of sites coloured in purple on this Exmouth map (though not all, the smallest ones, are fully legible) were submitted in the 2022 call for sites. New sites along the Exmouth waterfront, including a number of larger sites, have not been fully assessed though it is clear that many fall on land that is vulnerable to flooding and as such would not be favoured locations for residential development. To sustain an allocation for housing development on such sites we would need to undertake an exercise called a sequential test which would need to demonstrate that there are no alternative sites that could be developed that would be at a lesser risk of flooding. The expectation is that this would be very difficult to prove. There are also a number of smaller sites that have not yet been assessed but from a preliminary review may offer some though limited additional scope for housing development. One comparatively large site that was submitted, Land west of Hulham Road, is referenced in the table below. It should be noted that some 2022 call for site submissions overlay or fall within sites that have already been submitted in previous call for sites.

**Table of sites assessed at Exmouth**

Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
Exmo_01 – Estuary side	This site falls within a floodplain and is rejected as offering scope for residential development.	0	0
Exmo_02 - Queen's Drive, Exmouth, EX82AY	This site falls within a floodplain and is rejected as offering scope for residential development. Assessment has not been taken forward.	0	0
Exmo_03 - Land at bottom of Bapton Lane	This site has been identified as forming part of the Exmouth Valley Park and is rejected as a potential allocation for housing.	0	0
Exmo_04 - Land at Marley Drive	Northern parts of this site are within the Pebblebed Heaths 400 m exclusion zone, within which new residential development is not permitted, Southern parts of this site are, however, beyond the exclusion zone and as such may offer some qualified scope for new housing. It should be noted that this site also overlays a separate smaller site, Exmo_12 and overlays a new call for sites 2022 submission, the separate sites are not separately assessed. In biodiversity terms the site is very sensitive (due to the narrow size of field parcels and presence of several habitats of principle importance) and due to the ecological sensitivities the site is considered to be a '2nd best' allocation. If it were ultimately allocated for development then it is suggested that the site is combined with adjoining areas for a housing and mixed use development.	0	70

Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
Exmo_05 - Buildings and land at Maer Farm (and also Exmo_13)	This site has a permission for development and assessment is not undertaken and no additional scope for development is identified.	0	0
Exmo_06 - Douglas Gardens	The site provides a good opportunity for development. Some care will be needed to avoid and limit possible adverse landscape impacts and to protect boundary hedges.	44	0
Exmo_07 - Bystock Court	The site is very sensitive in respect of heritage and nature conservation matters and as such is not proposed as an allocation for development.	0	0
Exmo_08 - Littleham Fields	There are some heritage and landscape impact concerns associated with this site. It is suggested as a preferred allocation though the capacity of the site may warrant some moderation in respect of future more detailed work.	40	0
Exmo_09 - Land to the east of Capel Lane	This site falls within Site Exmo_17. See Exmo_17 (below) for site commentary.	0	0
Exmo_10 - Land to the north of Salterton Road	The site is not regarded as appropriate for allocation for development. It is quite open and exposed in landscape terms and large parts have a rural rather than urban fringe character. Easterly parts of the site, in particular, are remote from services and facilities and if the site were developed it would form quite a large 'tongue of development' projecting into open countryside with visual impacts on areas of open countryside.	0	0
Exmo_11 - Land to the South of Courtlands lane	This site, as effectively extended by a new/amended site in the 2022 call for sites, is sensitive in landscape terms and close to heritage assets. It is not a preferred site for allocation, but constraints are not regarded as an absolute and it might be seen as a '2 <sup>nd</sup> best' choice for allocation.	0	12
Exmo_12 - Land off Marley Road	Site not assessed as it falls within the boundaries of a larger assessed site Exmo_04. See Exmo_04 for comments.	0	0
Exmo_14 - Land at South Lodge	This site was regarded as too small (single dwelling size) to warrant assessment.	0	0
Exmo_15 - Land off Capel Lane	Site not assessed as it falls within the boundaries of a larger assessed site Exmo_17. See Exmo_17 for comments.	0	0

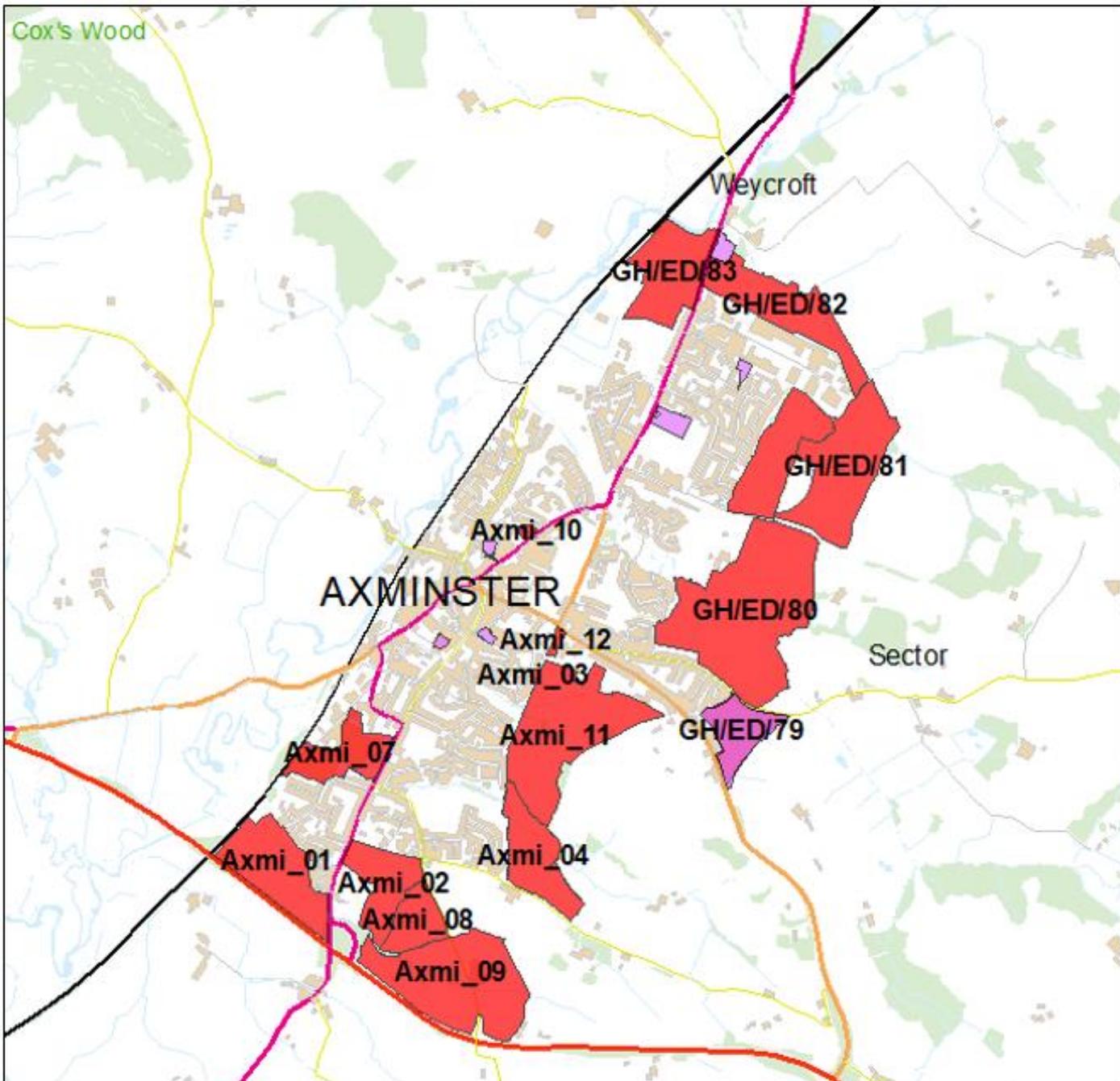
Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
Exmo_16 - Land to the rear of Elm Lane	The site provides a good opportunity for development, though this would be particularly so if highway access were achieved from land to the north-west of the site, via Exmo_08, should it also be allocated for development.	5	0
Exmo_17 - Land to the South of Littleham	Taken as a whole the site would be a quite poor choice for allocation for development. It predominantly forms an open countryside site inside the East Devon AONB. However a small part of the site, with reference number Exmo_15, falls within Exmo_17, and it would make a realistic choice for allocation but with capacity for around about 10 dwellings. Notwithstanding the limitations of the site it is suggested as a '2 <sup>nd</sup> best' option for allocation, but in so doing it would raise significant issues about the suitability or desirability of accommodating large scale development in the AONB. The site is favourable from an ecological perspective, with predicted minimal ecological impacts, though there will undoubtedly some localised areas of value.	10	400
Exmo_18 - Land directly to the east of Liverton Business Park	The site is allocated in the existing local plan for employment uses and rolling this allocation over into the new plan would be appropriate. The site lies adjacent to an existing successful business and employment park and benefits from good road access. No provision is recommended for housing development.	0	0

Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
Exmo_20 - Land at St. John's (also has ref GH/ED/76)	<p>The site is large scale and as such could meet a lot of the overall housing needs. It is also well screened and so long as development is predominantly in central and southerly parts of the site then building work should be comparatively unobtrusive (especially noting the overall scale of what could be accommodated). However, there are built heritage sensitivities associated with the site and more significantly there are significant local levels of biodiversity interest at the site that could be adversely affected by development. A site promoter shows highway access to the south of the site coming through lengths of Unconfirmed Wildlife Site, which would clearly cause destruction and landscape scale severance of what could be high value habitats (deciduous woodland). In addition this access road would use existing residential roads that suffer from localised congestion. The possible highway suitability would require more detailed and fine grained assessment should proposals progress. The precise scale of housing that may be achievable will need more refined assessment. The figure quoted is on the high side and may need to come down in order to ensure possible adverse ecological impacts are avoided and mitigated against. The site is not identified as a preferred site but it is suggested that it may be a possible '2<sup>nd</sup> best' choice, though noting significant challenges that the site presents.</p> <p>At the Committee meeting a presentation from agents acting for the/a land owner advocating a much more modest scheme of one field for 75 dwellings though with potential to also build in an adjoining field to take the total to 150 homes. We have adjusted 2nd Best potential capacity down to 150 dwellings to reflect the land owner's submission.</p>	0	<p>150</p> <p>Based on the reduced site area now being promoted based on the presentation to the 9<sup>th</sup> August meeting.</p>
Lymp_07 - Land at Courtland Cross	<p>There are heritage and landscape impact concerns associated with this site. It is not a preferred site for allocation, but constraints are not regarded as an absolute and it might be seen as a '2<sup>nd</sup> best' choice for allocation. Any development, if allocated, should avoid more sensitive western parts of the site.</p>	0	100

Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
Lymp_08 - Land off Summer Lane	The site is relatively remote from facilities in Exmouth and is of some openness in longer term views. It has a countryside character. It is not a preferred site for allocation, but constraints are not regarded as an absolute and it might be seen as a '2nd best' choice for allocation.	0	14
Lymp_09 – Land at Hulham Road	This site is identified as a preferred allocation for residential development. Impacts on the adjacent deciduous woodland would need to be avoided through sensitive site design, e.g., leaving a suitable buffer between the development and the woodland.	54	0
Lymp_10 - Land off Hulham Road	The lower three fields of this site are identified as a preferred allocation for residential development. It is suggested that the site is combined with adjoining areas for a housing and mixed use allocation. It should be noted that another submission Lymp_15 overlays part of this submission but it is not separately assessed.	75	0
Lymp_12 – Land north of Summer Lane	Potential for significant adverse heritage impacts at this site, should development go ahead, and this is a major consideration. Allied to this are concerns around adverse landscape impacts from development.	0	0
Lymp_13 - Kings Garden & Leisure, Higher Hulham Road	This site is in an existing job generating use and is not proposed as an allocation for residential development.	0	0
Lymp_14 - Coles Field, Hulham Road	This site is identified as a preferred allocation for residential development. It is suggested that the site is combined with adjoining areas for a housing and mixed use allocation.	59	0
Land west of Hulham Road (South East of Point in View)	On the face of it the site would appear to be a reasonable allocation for development however, on closer assessment it is clear that this site falls within a designated Historic Park and Garden and as such recommendation is now that it should not be allocated.	0	0
Land North East of Old Bystock Drive	This site came forward outside of the SHLAA process and was identified in the Working Draft Local Plan for development. However, on closer examination it is considered that biodiversity impacts at and around the site are significant and they are deemed to rule out reasonable scope for house building.	0	0
	<b>Totals</b>	<b>287</b>	<b>746</b>

## Axminster

- 4.13 Axminster has a good range of services and facilities including a railway station. AONB boundaries are away from the town but there are visible connections from large parts of the town and from many sites being promoted for development. Given its medium population level (compared to East Devon towns overall) Axminster supports a large number of jobs and has seen comparatively high levels of growth in recent years.
- 4.14 Members will be aware that the River Axe is subject to guidance from Natural England with regard to us only being able to permit developments within the catchment of the River that can be demonstrated to be nutrient neutral i.e. they will not add to phosphate discharge into the River Axe. Work is on-going to deliver a mitigation strategy to deliver the necessary mitigation and a working assumption is that this will be in place prior to adoption of the Local Plan and that we will have sufficient certainty that mitigation will be available for plan examination. On this basis it is recommended that we continue to plan for growth in Axminster at this time.
- 4.15 15 sites were assessed at Axminster, with a further seven sites in close proximity to the town being submitted in response to the 2022 Call for Sites, shown in purple on the map. Of these later 7 sites, Land East of Chard Road and South of Weycroft Brook were discounted due to being detached from the town and, being located on a north facing slope, having no visual relationship with the urban area either, and land at Lyme Road has already been submitted under reference GH/ED/79. The remaining sites from 2022 are relatively small sites located within the town and will be assessed at a later date. See over the page for map and table for Axminster.
- 4.16 Members will be aware that the currently adopted local plan allocates a strategic site to the east of the town as an urban extension and this includes provision for an Axminster relief road. A masterplan envisaged the delivery of up to 850 houses, a school, employment land and a distributor road, utilising (all or most of) sites GH/ED/79-82. However, there are very significant viability issues concerning the delivery of the relief road which would require in the region of £15million of public money to deliver. It is very unlikely that such funding will become available in the foreseeable future and satisfying the tests that sites must be viable and deliverable would be difficult (if not impossible) to prove at plan examination. It is not recommended that the new local plan includes policy for a relief road to the east of Axminster, we simply do not see how it can be realistically implemented, though there are some land areas in the southern part of the previously suggested overall development that could be appropriate for new homes.
- 4.17 In this assessment work we have suggested the allocation of sites that would accommodate a substantial number of new homes in the town on preferred sites, a figure of 745. This high level of growth follows the high strategic growth expectations that exists in the existing local plan, it assumes such aspirations still exist even though there seems little chance for relief road delivery.



## Site assessment map for Axminster

Sites coloured in Red are from calls for sites from 2017 and 2021.

Sites coloured in Purple are from the new Call for Sites from 2022.

It should be noted that there are a number of cases where submission sites overlay one another and there have been some re-submissions at various points. Mapping limitations mean that not all site specific boundaries are explicitly clear and Appendix 2 to this committee report should be referred to for a complete picture.

Mapping:

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Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
GH/ED/79 Land east of Axminster	The site lies on an eastern side of Axminster and is identified as a good site for housing growth. The site formed the southernmost part of the previously allocated urban extension with access from Lyme Road. The endorsed masterplan for the urban extension provides guidance for how this site should come forward and a planning application for it is already under consideration. The extent to which the development would need to safeguard the route of a potential future relief road and access to GH/ED/80 would need to be determined.	93	0
GH/ED/80 Prestaller Farm, Beavor Lane, Axminster	The site lies on an eastern side of Axminster and is identified as a good site for housing growth. This area also formed part of the previously allocated urban extension and is covered under the endorsed masterplan. The main challenges with developing this site are the site levels which drop steeply into the central part of the site around Mill Brook such that only the part of the site south of Mill Brook could realistically come forward and this would necessitate access via GH/ED/79.	200	0
GH/ED/81 Land east of Axminster	Given that securing a relief road is not considered to be a viable proposition there would not appear to be a credible or viable option to secure acceptable highway access to serve this site. It is not proposed as an allocation for development.	0	0
GH/ED/82 Land east of Axminster	This site lies close to a range of heritage assets with the potential for adverse impacts, it is also of some landscape sensitivity. It is not proposed as an allocation for development.	0	0

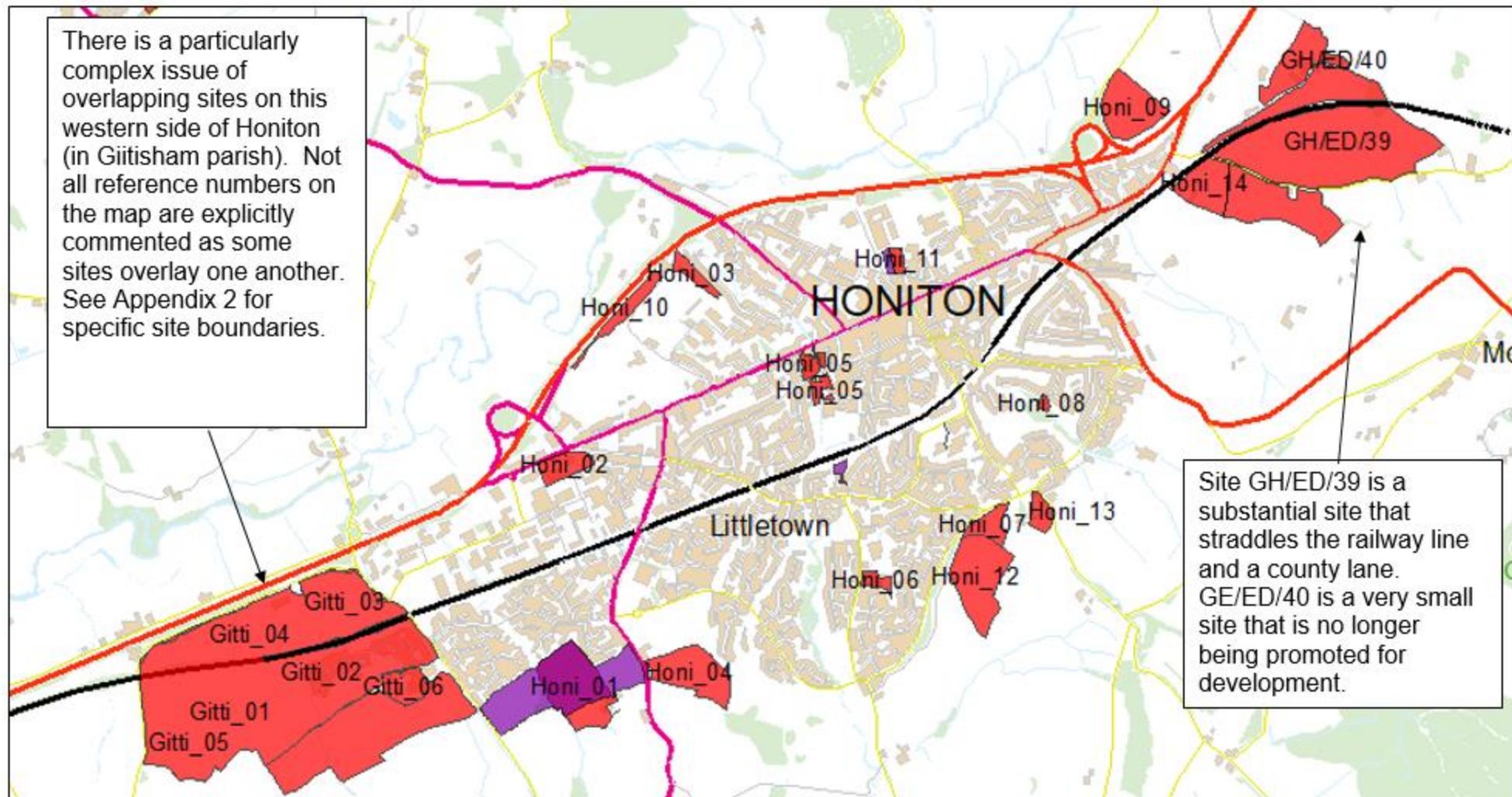
Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
Axmi_01 Land off Musbury Road, Axminster	Axmi_01 is well related to an excellent range of services and facilities within Axminster. However, it is heavily constrained by a range of issues that are likely to significantly reduce the development potential of the site for residential use. These include flood zones 2 and 3 running through a large proportion of the middle of the site and the A35 Trunk Road on the south western boundary. Access to and within the site may be affected by flooding issues and most of the site is within the East Devon AONB. The close proximity of the site to the River Axe SPA and SSSI mean that there is potential for significant major adverse impacts. There may be significant archaeological features and artefacts in the site. Site constraints severely limit the potential of the site to be developed for housing. However, development of the southern part of the site for employment purposes may be acceptable, subject to landscape appraisal, provision of suitable access and other considerations.	0	0
Axmi_02 Land North of Shoals, Musbury Road, Axminster	Axmi_02 is well related to an excellent range of services and facilities within Axminster. However, it forms part of the attractive landscape to the south of Axminster and adjacent to a Scheduled Ancient Monument. There may be significant archaeological remains within the site. The site borders a tributary to the River Axe and development has the potential to affect an internationally recognised site of conservation importance.	100	0
Axmi_07 Axminster Carpets Factory Site, Woodmead Road, Axminster	Redevelopment of Axmi_07 for a mix of housing and employment generating uses, whilst safeguarding the existing industrial use, has the potential to improve this part of the town and utilise a brownfield site. Benefits of a comprehensive masterplan for the area could include environmental improvements with new housing in a highly sustainable location and better pedestrian links. Parts of the site are however subject to flooding and could therefore only be used for employment purposes and hence the housing capacity of the site is quite low compared to the site area.	50	0

Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
Axmi_08 Land off Wyke Lane, Axminster	Axmi_08 is quite well related to an excellent range of services and facilities within Axminster. However, it forms part of the attractive landscape to the south of Axminster and adjacent to a Scheduled Ancient Monument. There may be significant archaeological remains within the site. The site borders a tributary to the River Axe and development has the potential to affect an internationally recognised site of conservation importance.	68	0
Axmi_09 Great Jackleigh Farm, Axminster	Axmi_09 is fairly well related to an excellent range of services and facilities within Axminster. However, it forms part of the attractive landscape to the south of Axminster and adjacent to a Scheduled Ancient Monument. There may be significant archaeological remains within the site. The site borders a tributary to the River Axe and development has the potential to affect an internationally recognised site of conservation importance. The A35 trunk road to the south is a potential source of noise pollution. The potential number of homes that this site may accommodate would need to be subject to finer grained assessment in response to possible constraints, specifically including arch logical interests.	0	270
Axmi_10 Scott Rowe Building, Axminster Hospital, Chard Street, Axminster	The redevelopment of Axmi_10 is an opportunity to provide residential accommodation in a highly sustainable location on land no longer required for health purposes albeit it would lead to a loss of land used for community purposes. Good opportunity for redevelopment for housing, possibly relatively high density apartment style dwellings on a sustainable brownfield site. Axmi_10 could be allocated for residential redevelopment alongside the Axminster Masterplan eastern extension, if pursued.	10	0

Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
Axmi_11 inc. Axmi_04 Land on the south east side of Axminster	Axmi_11 is well related to an excellent range of services and facilities within Axminster. However, it forms part of the attractive landscape to the east of Axminster and parts of the site are quite steeply sloped. It is not clear that satisfactory highway access could be achieved for the level of development that could be accommodated on the whole site. The southern part of the site is on the other side of a lane from a Scheduled Ancient Monument. There may be significant archaeological remains within the site. The site borders a tributary to the River Axe and development has the potential to affect an internationally recognised site of conservation importance.	0	100
Axmi_12 Land at Lea Combe, Field End, Axminster	Axmi_12 is well related to an excellent range of services and facilities in Axminster. It is already within the Built-up Area Boundary defined in the adopted Local Plan and it is not clear what has prevented the site from being developed as yet, although there are some constraints, including a Tree Preservation Order on part of the site. Axmi_11 is well related to the excellent range of services and facilities in Axminster and, given the limited site capacity and urban location, could be allocated for residential redevelopment alongside the Axminster Masterplan eastern extension, if pursued.	9	0
GH/ED/83 Land at Chard Road, Axminster	GH/ED/83 is quite well related to an excellent range of services and facilities within Axminster. The site borders the River Axe and development has the potential to affect an internationally recognised site of conservation importance. Further work is required to assess the impact of development on nearby heritage assets.	215	0
	<b>Totals</b>	<b>745</b>	<b>370</b>

## Honiton

- 4.18 Honiton is located in a central part of East Devon District, it supports a wide range of services and facilities and it is an important employment centre for East Devon. In transport terms the town is well served by a railway station and the A30 Trunk road giving easy road access to the M5 Motorway and Exeter. There are clear strategic reasons that suggest Honiton is a good location to accommodate larger scale levels of growth, however there are significant environmental constraints at the town. The Blackdown Hills AONB lies to the north of the town, as does the River Otter and its floodplain whilst the East Devon AONB lies to the south. These environmental constraints are significant and major promoted site options predominantly fall to the west and east of the town. In respect of the westerly options, in particular, they are some distance from the town centre which forms a focal point for services and facilities.
- 4.19 Sites submitted at Honiton are shown on the map over the page along with tabulated commentary that follows. A total of 22 original sites, plus 3 new sites from the 2022 call for sites were identified at Honiton in stage 1.
- 4.20 In addition, three sites were submitted at Honiton in the 2022 call for sites. One of these partly overlaps with Honi\_01; the key issue appears to be landscape impact as the site largely falls in the AONB. Silver Street Long stay car park was submitted, which is adjoining Honi\_11. They share the same concerns on heritage impact and are located on the edge of the Honiton conservation area. The remaining new site is a small existing garage on Livermore Road. Key constraints to highlight are its location close to the existing neighbourhood and a small proportion of the site falling in flood zone 3.
- 4.21 The assessment work in Honiton reveals that of the sites that were assessed four are identified as preferred allocations for development and these have the capacity to accommodate approximately 182 new homes and approximately 14.5ha of employment land.
- 4.22 Although they are sites with clear constraints there were seven sites in Honiton that were identified as Potential '2nd Best' Allocation choices and committee may wish to look to these as possible allocation choices to address the housing shortfall that has been identified. The identified '2nd best' choice sites would accommodate an additional 306 new homes.



### Site assessment map for Honiton

Sites coloured in Red (with some minor shading variations) are from calls for sites from 2017 and 2021. Sites coloured in Purple are from the new Call for Sites from 2022. It should be noted that there are a number of cases where submission sites overlay one another and there have been some re-submissions at various points. Mapping limitations mean that not all site specific boundaries are explicitly clear and Appendix 2 to this committee report should be referred to for a complete picture.

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**Table of sites assessed at Honiton**

Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
Gitti_03 Land on the western side of Hayne Lane, Gittisham, Honiton	The site is allocated in the existing local plan for employment uses, located on the edge of Honiton. It has minor heritage and ecological impact and medium landscape sensitivity as it is close to AONB. The loss of employment land make this site unacceptable for housing but an employment site allocation should be maintained.	0	0
Gitti_04 Land to the West of Combe Garden Centre, Gittisham, Honiton	The site is allocated in the existing local plan for employment uses, located on the edge of Honiton. Adjoining the Garden centre and new residential development in south east. It has minor heritage and ecological impact and medium-high landscape sensitivity as it is close to AONB. The loss of employment land make this site unacceptable for housing but an employment site allocation should be maintained.	0	0
Gitti_05 Land to west of Hayne Lane, Honiton	Development of the site, taken as a whole, would have a high landscape impact, as the site is quite substantial and southerly parts of the site fall within the AONB with high inter-visibility, this would be a significant constraint in development. However, as a '2 <sup>nd</sup> best' choice it is suggested that around 100 houses might be accommodated on western parts of the site close to existing urban edges of Honiton but noting sensitivities around potential adverse AONB impacts.	0	100
Gitti_06 Hayne Farm, Hayne Lane, Honiton	The site is made up of the existing Hayne farm buildings. The site adjoins existing and new residential development in the North, and Gitti_05. Development of the site may have a medium landscape impact as the site is located close to the AONB (within 100m), as well as minor heritage and ecological impact. The scale of development (31 max yield) on this site would help deliver the district-wide housing requirement in a manner that is consistent with the spatial strategy.	31	0

Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
<p>Honi_01 Land at Heathfield, East Of Hayne Lane, Honiton</p>	<p>Development of the site (79 max yield) would have a high landscape impact, as the site is within AONB with medium-high visibility, minor heritage and ecological impacts might be expected. It should be noted that in the 2022 call for sites a larger area incorporating Site Honi_01 and fields to the west and east was submitted. Whilst the site is sensitive, the site could potentially be a '2<sup>nd</sup> best' choice option for some development, though with particular care given the AONB status of the site. Taking into account the 2022 call for sites the yield may be adjusted upward, but the AONB status of the site could become a moderating consideration impacting on capacity.</p>	0	79
<p>Honi_02 Land at Blackdown House, Honiton</p>	<p>The western portion of this site has been redeveloped for EDDC offices and has no additional scope for development. The eastern portion is existing employment land and should be retained for such purposes particularly given its relationship with adjoining employment uses.</p>	0	0
<p>Honi_04 Land lying to the North East of Heathfield Manor Farm, Honiton</p>	<p>Development of the site (56 max yield) would have a high landscape impact, as the site is within an AONB with medium-high visibility, minor impacts on heritage and ecological.</p>	0	0
<p>Honi_05 Land to the north and south of King Street, including former Foundry Yard, Honiton</p>	<p>Development of the site (40 max yield) would have a high heritage impact as part of the site is in the Honiton conservation area, parts fall in Flood zone 3 and the majority is in Flood zone 2. However, it is a brownfield site that is scruffy in appearance and a high quality development scheme may be possible positive option, as such it is identified as a possible '2<sup>nd</sup> best' choice, albeit there would need to be satisfaction that flooding concerns would not be relevant or could be overcome.</p>	0	40
<p>Honi_06 Former Millwater School, Honiton Bottom Road, Littleton, Honiton</p>	<p>Brownfield site, former Millwater School site. Development of the site would have minor heritage, ecological and landscape impact. Good access to facilities and employment. The scale of development (30 max yield) on this site would help deliver the district-wide housing requirement in a manner that is consistent with the spatial strategy.</p>	30	0

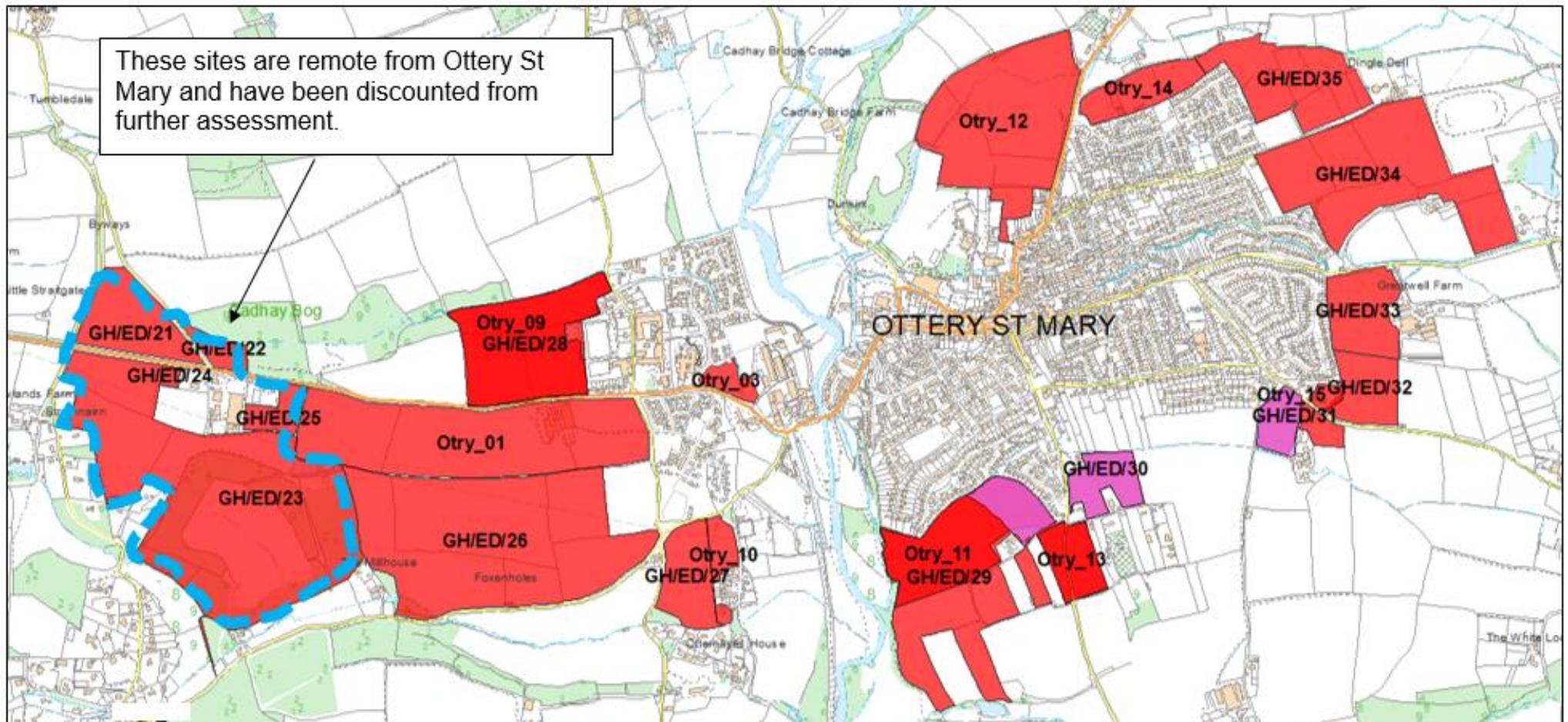
Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
<p>Honi_07 Land adjacent to St Michaels Church, Honiton</p>	<p>This elevated greenfield site, in agricultural use, lies adjacent to the Church of St Michaels and it falls in an AONB. Development of the site (30 max yield) would have high impacts on landscape and heritage. However it is suggested as a '2nd best' choice option, despite AONB designation, though it would be appropriate to look at capacity levels in some more detail.</p>	<p>0</p>	<p>30</p>
<p>Honi_08 Land at the South Side of The Glenn Honiton</p>	<p>This greenfield site, with extensive vegetation cover, falls in an easterly part of Honiton above the Glen in an existing residential area. Development of the site could have a medium impact on landscape due to the connection with the Glen. Minor heritage impact with good access road. Development of the site would result in the encroachment on and partial severance of the green corridor at The Glen, and would necessitate the destruction of an area of mapped priority habitat (Deciduous woodland) as well as degradation of the ecological quality of the surrounding woodland due to increased lighting and disturbance. This site forms part of the "core nature area" which is to be used within the future Local Nature Recovery Strategy. This site therefore has a potential major impact on ecology, which is disproportionate from its potential to provide only a limited number of units (6 max yield). This site is therefore not proposed for allocation.</p>	<p>0</p>	<p>0</p>
<p>Honi_09 Former Honiton Showground, Langford Road, Honiton</p>	<p>This site is separated from the town by the A30. The site falls in the AONB with wide open views to and from surrounding countryside, development of it would have a high impact on the landscape. Minor heritage and ecological impacts could also be expected.</p>	<p>0</p>	<p>0</p>
<p>Honi_10 Land at Ottery Moor Lane</p>	<p>This site forms a narrow strip of Greenfield land on the northern side of Honiton. The site is screened but lies close to the A30, and a new residential development site. Vehicle noise impacts would have impacts on development suitability. In other respects, the site appears well placed for development.</p>	<p>21</p>	<p>0</p>

Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
<p>Honi_11 Honiton Cattle Market, Silver Street, Honiton</p>	<p>The cattle market site lies in a central part of Honiton, it is located on the edge of the conservation area, and close to a number of listed buildings in the conservation area. Development would have an impact on the historic environment. However, a planning permission has very recently be granted at this site at appeal for a flatted elderly person's home. For current number accounting purposes we have included it as a '2nd best' choice for allocation, but we will account for this element of housing delivery in future housing number assessments and would not envisage this site featuring in final consultation documents as a possible allocation.</p>	<p>0</p>	<p>57</p>
<p>Honi_12 land on the south-east side of Cuckoo Down Lane, Honiton and land at Lower Marlpits Farm, Honiton</p>	<p>This site falls in an AONB and adjoining the Church of St Michael, grade 2* listed building. The site is close to the asset and visible from the asset, although views are not open due to the presence of intervening hedgerow and trees. Development of the site (71 max yield) would have high impacts on landscape and heritage. The site is on rising land that juts outward from the existing built form of Honiton.</p>	<p>0</p>	<p>0</p>
<p>Honi_13 Middle Hill, Church Hill, Honiton</p>	<p>This site falls in an AONB and adjoining to the Church of St Michael, grade 2* listed building. The site is close to the asset and visible from the asset, although views are not open due to the presence of intervening hedgerow and trees. Development of the site (10 max yield) would have impacts on heritage and medium impact on landscape. However it is suggested as a '2nd best' choice option, despite AONB designation.</p>	<p>0</p>	<p>10</p>
<p>Honi_14 Hurlakes, Northcote Hill, Honiton</p>	<p>This site lies on the eastern side of Honiton, south of the railway and is accessed via a narrow stretch of road under the railway. The site is close to the AONB and isolated from existing development at Honiton and thus, remote from facilities. Development of the site would have some adverse landscape impacts. It is however, suggested as a '2<sup>nd</sup> best' choice for allocation.</p>	<p>0</p>	<p>30</p>

Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
GH/ED/39 Land south of Northcote Hill, Honiton	<p>Whilst this site did not pass stage 2 HELAA Panel assessment it was deemed as appropriate to appraise it given known developer interest in the site and potential that is felt to exist to overcome possible constraints, notably in respect of highway considerations. The site straddles the railway line and parts of the site to the north of the railway are identified as offering reasonable development potential assuming any highway constraint concerns can be overcome.</p> <p>South of the railway the land rises quite steeply and the site is divorced from the built up edges of Honiton. At this stage of work the area south of the railway line is not considered suitable for allocation.</p>	100  On land to the north of the railway line.	0
	<b>Totals</b>	<b>182</b>	<b>306</b>

## Ottery St Mary

- 4.23 Ottery St Mary is the smallest of the five East Devon towns that fall with the Tier 2 settlement classification. Of the six Tier 1 and 2 towns (excluding Cranbrook) it is, however, the one that is furthest away from designated AONBs and in this respect is less constrained by this national level landscape designation, though there is some inter-visibility between parts of the town and some site options on the edges of the town and AONB land to the east. The town has a good range of services and facilities, though less than some bigger towns, and western parts of the town have good road access, going westward, to the M5 Motorway and Exeter. Tight road layouts can, however, lead to localised areas of congestion in the town, especially in the town centre. Localised highway constraints are noted for a number of potential development sites around the town.
- 4.24 Sites submitted at Ottery St Mary are shown on the maps on the following pages along with tabulated commentary that follows. 13 potentially suitable sites were assessed (and appear in the table below) with other sites being discounted as being too far from the town. The 2022 Call for Sites resulted in three potentially suitable, edge of settlement sites being put forward but, as these overlapped sites already in the system which appear in the assessment table, they have not been separately considered.
- 4.25 The assessment work reveals that of the sites that were assessed five are identified as preferred allocations for development and these have the capacity to accommodate approximately 248 new homes and at least 1.25ha of employment land. Given the location of Ottery St Mary close to Exeter and the A30, the range of facilities it supports and its status as a Tier 2 settlement in the emerging local plan settlement hierarchy, committee may regard it as a strategically sensible location to accommodate additional development. However, members will be mindful of the access constraints arising from the historic layout of the town centre and network of narrow lanes on three sides and the wide floodplain which bisects the town, making pedestrian and cycle access to facilities more difficult.
- 4.26 Although they are sites with clear constraints there were sites in the town that were identified as Potential '2nd best' allocation choices and committee may wish to look to these as possible allocation choices to address the housing shortfall that has been identified. It should be noted however that '2<sup>nd</sup> best' allocations require further technical work to determine if they are suitable for allocation.



### Site assessment map for Ottery St Mary

Sites coloured in Red (with some minor shading variations) are from calls for sites from 2017 and 2021. Sites coloured in Purple are from the new Call for Sites from 2022. It should be noted that there are a number of cases where submission sites overlay one another and there have been some re-submissions at various points. Mapping limitations mean that not all site specific boundaries are explicitly clear and Appendix 2 to this committee report should be referred to for a complete picture.

Mapping: © Crown copyright and database rights 2022 Ordnance Survey 100023746

Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
Otry_01 Barrack Farm, Ottery St. Mary	A small eastern section of this site (5.1ha) is considered suitable for mixed use development, for at least 1.25ha of employment and up to 70 dwellings. This would be subject to Devon County Council Highways agreeing a suitable access, an archaeological assessment being undertaken and careful design to minimise visual obtrusiveness. There are ecology, heritage and landscape impacts with the remainder of the site. This site is part of an area identified in the adopted neighbourhood plan where development should be restricted to prevent settlement coalescence however it is considered that developing part of this site will not significantly undermine this aim.	70	0
Otry_09 Land at Thorne Farm, Exeter Road, Ottery St Mary	There are medium landscape and significant ecology concerns associated with this site and these increase to the north and west. Eastern and southern parts of the site could be most favourable to development. Devon County Council Highways advise that a new roundabout is required for access to the site and this may prove to be expensive. Part of the site is protected in the current Local Plan and Neighbourhood Plan for education use and DCC advise that there is a shortage of primary and secondary pupil places in the town noting that they have previously promoted a new school on part of this site. Given site sensitivities and the potential need to address secondary education needs as well as primary on the site a lower housing yield is suggested compared to past proposals for development of the site.	90	0
Otry_10 Land to North and South of Salston Barton, Ottery St Mary	The site is discrete and self-contained, on the edge of the settlement. The northern section of the site (outside the floodplain) could be allocated but the density should reflect the need to protect existing trees/hedgerows, avoid the sloping section of the site and accommodate the cycle/footpath through the site.	20	0
Otry_15 Land at Bylands, Slade Road, Ottery St Mary	This site is a large garden on the eastern edge of the town. It has minimal ecological, landscape or heritage impacts, although the yield is slightly reduced to minimise the impact on mature boundary trees. Access is via a country lane and safe pedestrian access would need to be achieved. The lane cannot accommodate large numbers of extra cars. This site would 'round off' development.	8	0

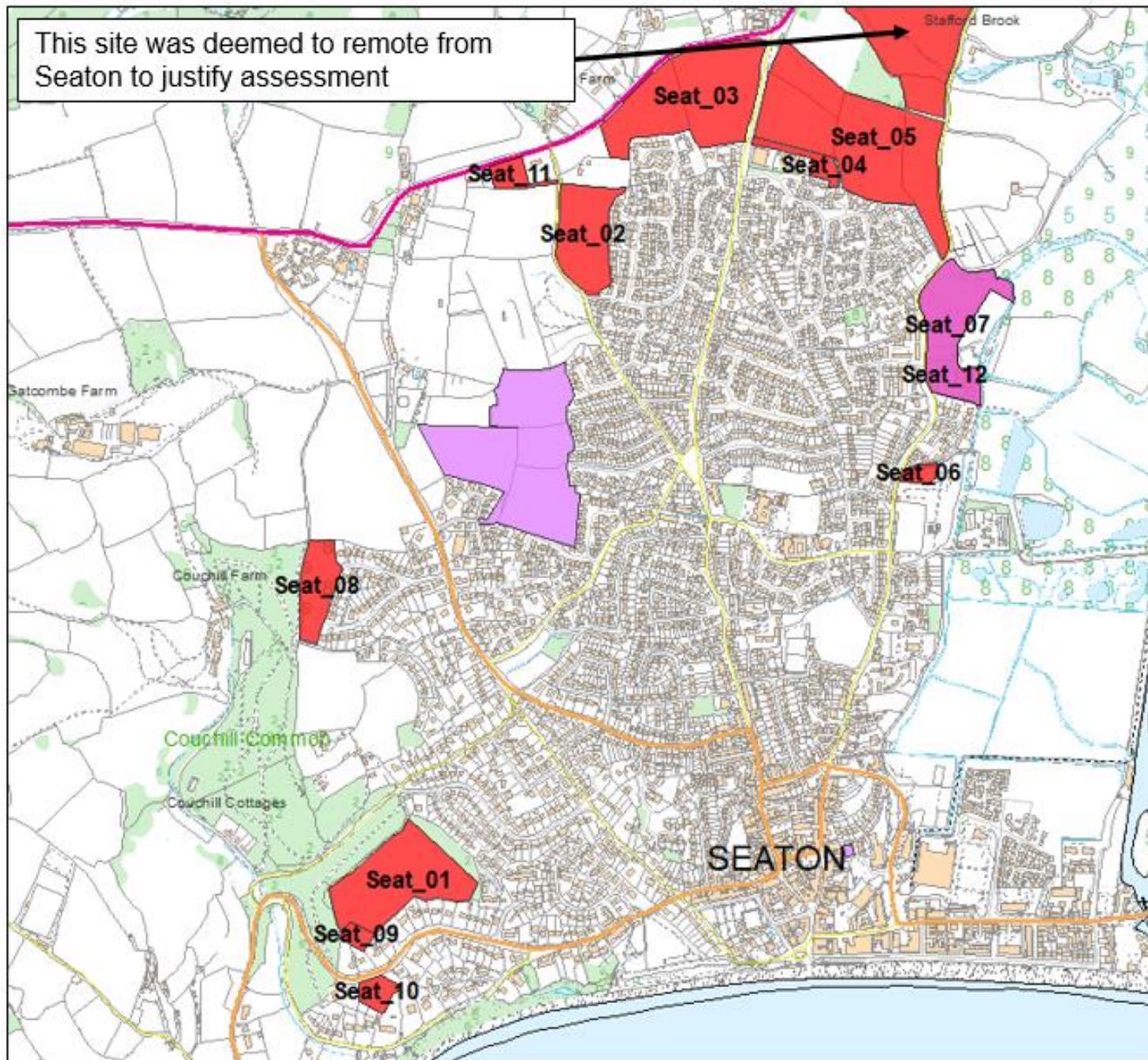
Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
GH/ED/26 Land west of Cadhay Lane, Ottery St Mary	This site does not abut the town and wholly extends into open countryside. There are heritage, ecology and visual impact concerns. This site is part of an area identified in the adopted neighbourhood plan where development should be restricted to prevent settlement coalescence.	0	0
GH/ED/27 Land south of Strawberry Lane, Ottery St Mary	The site is on the southern periphery of the settlement and has a semi-rural character. It could be considered to round off this part of the town. Tree planting is required to reduce visual impact	60	0
GH/ED/29 Gerway Farm, Ottery St Mary	This is a large site with large variation in character and constraints. Part of the site (adjoining existing development at Claremont Field and Gerway Close) could be allocated for development, and could provide benefits in the form of a footpath link between the two estates and a band of tree planting to minimise visual impact from the south. Allocation would need to be subject to satisfactory highways and archaeological/heritage assessment as the smaller section would need to be accessed through an existing estate and it is very sensitive in heritage terms, being a historic field enclosure with pre-historic and medieval finds nearby,	0	40
GH/ED/30 Sidmouth Road J/W Gerway Lane, Ottery St Mary	Greenfield site which relates well to the built up area, highly sensitive in heritage terms, unable to achieve satisfactory access and pavement (this site has a history of refused planning permissions)	0	0
GH/ED/31 Slade Farm, Ottery St Mary	Site is a greenfield site on the eastern side of the town which would extend into open countryside. Development would be visible from a considerable distance. Concerns regarding insufficient highway capacity	0	0

Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
GH/ED/32 Church Path Field, land east of Chineway Gardens, Ottery St Mary	Parts of the site are sensitive in landscape terms. Slade Road is unsuitable to accommodate additional vehicles, especially if Otry_15 is developed. Developing part of the site is not appropriate as development would extend into the countryside beyond the natural form of the town.	0	0
GH/ED/33 Land adjacent Great Well Farm, Ottery St Mary	Parts of the site are sensitive in landscape terms. Chineway Road is unsuitable to accommodate strategic level traffic. Developing part of the site is not appropriate as development would extend into the countryside beyond the natural form of the town.	0	0
GH/ED/34 Land at Littlewell, Ottery St Mary	Parts of this site are highly visible in the landscape but the main concern is the lack of suitable access. Current access is via a single width dirt track extending beyond the surfaced road of Higher Ridgeway. The site could only be developed if the road were extended and widened along this track (which is unlikely to be possible), or if access were taken via Chineway Road to the south of the site. However, access onto Chineway Road would require removal of a species-rich hedgebank and mature trees and the potential access point is located at least 450m along a country lane, beyond the built form of the town and with no obvious way to provide a pavement to the town. In either case, access into and through the town is constrained by narrow roads and a single route through the town centre.	0	0
GH/ED/35 Land at Ridgeway, Ottery St Mary	Parts of the site are highly visible in long range views. Current access is via a single width dirt track extending beyond the surfaced road of Higher Ridgeway. The site could only be developed if the road were extended and widened along this track (which is unlikely to be possible), or if access were taken via the "Butts Road" development which adjoins the site to the west. However, in either case, access into and through the town is constrained by narrow roads and a single route through the town centre.	0	0
	<b>Totals</b>	<b>248</b>	<b>40</b>

## Seaton

- 4.27 Seaton lies in a south easterly part of East Devon some distance from major urban centres, it is the East Devon town that is most remote from Exeter as well as bigger centres in Somerset and Dorset and the town does not support a large number of jobs. The East Devon AONB falls very close to the town and there are strong visual links between much of the town, sites on its edges and parts of the AONB itself. The estuary of the River Axe, on the town's eastern side, is an important wildlife reserve. The town has a reasonable range of services and facilities, but is the only Tier 1 or 2 settlement that lacks a secondary school (the academically selective Colyton Grammar school is close to the town in neighbouring Colyford).
- 4.28 A total of 12 original sites were identified at Seaton in Stage 1. These are shown on the map over the page. In addition, three sites were submitted at Seaton in the recent (2022) call for sites. One of these is the same as Seat\_07 which had previously been submitted. Seaton Town Hall long stay car park at Jubilee Mews (0.5 ha) was submitted and forms an accessible town centre location, with no significant constraints – the key issue appears to be the conservation area running through the western part of the site. The remaining new site is a large 8.4 ha site on the west edge of Seaton, adjoining Axeview Road and rising up towards Seaton Down Hill. Key constraints to highlight are its location almost entirely within the Honeyditches Roman settlement which forms a Scheduled Ancient Monument. There are also concerns about its landscape impact given its prominent position. These additional sites require further assessment and so are not included in the table below or appendix 2 but Seaton Town Hall car park is the only one with significant potential if Members are accepting of the loss of the car park.
- 4.29 Further detail on Stages 3 and 4 for the Seaton sites is contained in the appended 'Site Selection – interim findings at Tier One and Tier Two settlements', but the key reasons for allocating or not follow below.
- 4.30 The assessment work reveals that of the sites that were assessed 3 are identified as preferred allocations for development and these have the capacity to accommodate approximately 147 new homes. Given the scale of existing development at Seaton and the services and facilities available in the town this would be a modest level of growth for a town of this scale. However the town is highly constrained both ecologically and in terms of the landscape and so there are limited choices identified at this stage for '2<sup>nd</sup> best' sites to bolster supply in this location and further to this there is a basis to question the degree to which increasing housing supply in Seaton (at least further increasing it by a substantial degree) would promote good and positive strategic outcomes

This site was deemed to remote from Seaton to justify assessment



## Site assessment map for Seaton

Sites coloured in Red (with some minor shading variations) are from calls for sites from 2017 and 2021.

Sites coloured in Purple are from the new Call for Sites from 2022.

It should be noted that there are a number of cases where submission sites overlay one another and there have been some re-submissions at various points. Mapping limitations mean that not all site specific boundaries are explicitly clear and Appendix 2 to this committee report should be referred to for a complete picture.

Mapping:

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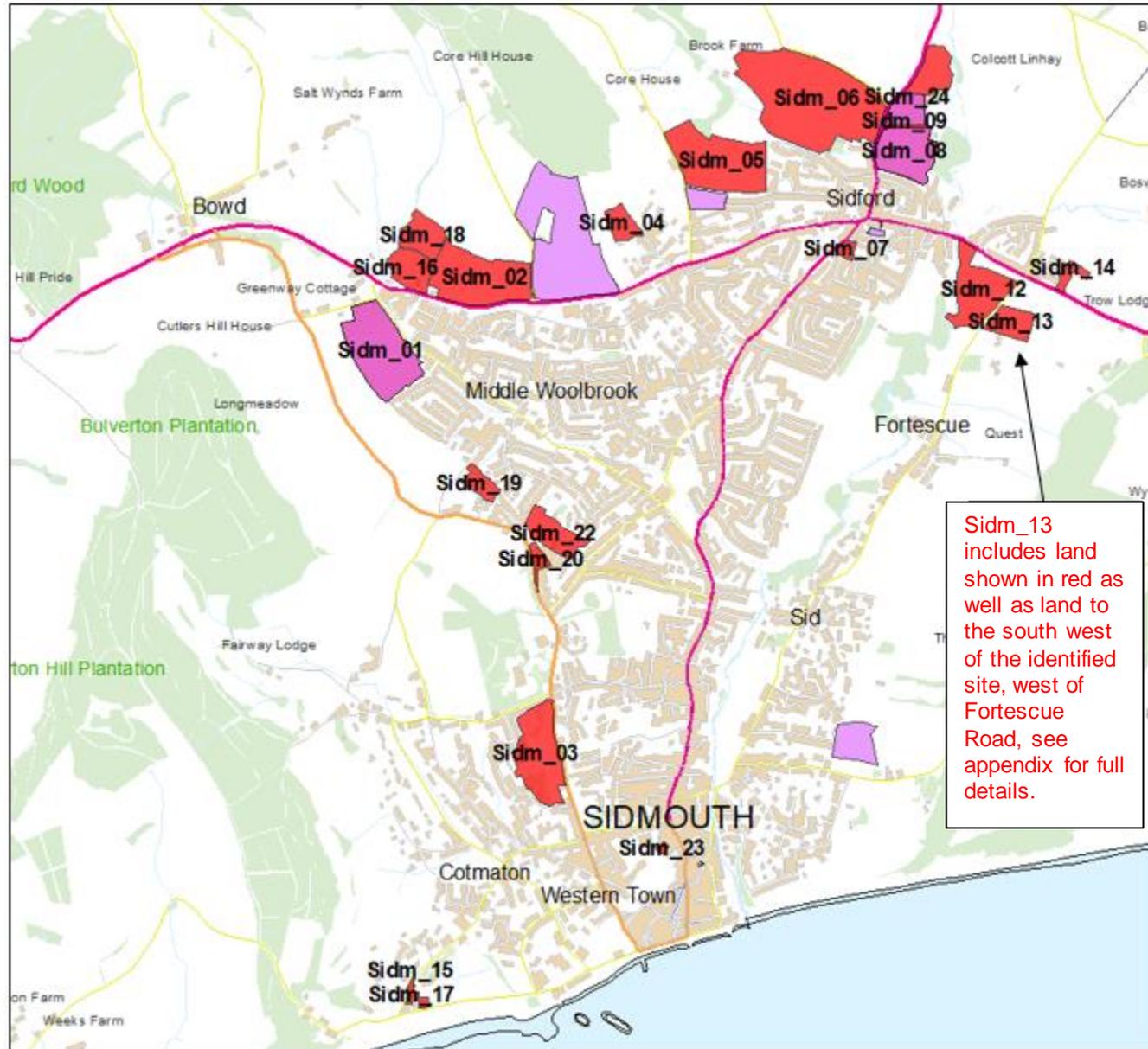
Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
Seat_01 Clay Common, Seaton	Although the scale of development on this site would be consistent with the spatial strategy, the site assessment identifies adverse impacts, particularly relating to landscape, which means that it should not be allocated.	0	0
Seat_02 Land at Barnards Hill Lane, Seaton	The scale of development on this site would help deliver the district-wide housing requirement in a manner that is consistent with the spatial strategy. Good access to facilities and employment, medium landscape sensitivity, but ecological impacts relating to use by Beer Quarry and Caves SAC bats will need to be addressed in bringing the site forward, specifically that of avoiding constriction of the bat pinchpoint between the northern edge of Seaton and Colyford. The development of the entire site is unlikely to be acceptable from a Habitats Regulation Assessment (HRA) standpoint. This means that reducing the developable area and avoiding development of the northern edge of the site, which may further reduce the total number of units which can be delivered on this site.	40	0
Seat_03 Land to the South of Harepath Hill, Colyford	The scale of development on this site would help deliver the district-wide housing requirement in a manner that is consistent with the spatial strategy. Good access to facilities and employment, but high/medium landscape sensitivity, moderate heritage impact, and adverse ecological impacts relating to bats associated with Beer Quarry and Caves SAC. A smaller part of the site, along the southern and/or eastern boundary would have less landscape impact, and this could be considered further. On this basis the site is suggested as a '2 <sup>nd</sup> best' choice site with a suggested possible capacity of 70 new homes. This figure is at the lower end of the capacity identified by the site promoter.	0	70

Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
Seat_05 Land off Harepath Road, Seaton, Devon	The scale of development on this site would help deliver the district-wide housing requirement in a manner that is consistent with the spatial strategy. Good access to facilities and employment, medium landscape sensitivity, and minor heritage impact. Significant ecological impacts relating to bats will need to be addressed in bringing the site forward - specifically, the constriction of the bat pinch point located between the northern edge of Seaton and Colyford. The development of the entire site is unlikely to be acceptable from a Habitats Regulation Assessment (HRA) standpoint, but a smaller part of the site, along the southern and/or eastern boundary, would have less of an ecological and landscape impact, and could be considered further. In order to ensure no adverse effect on the integrity of the Beer Quarry Caves SAC, suitable avoidance/ mitigation/ compensation measures would need to be identified. At this preliminary stage, it is considered that these would consist of a sensitive lighting plan (including sensitive site design, to ensure light levels of no more than 0.5 lux at the northern development boundary) and compensatory bat foraging and commuting habitat within the remainder of the proposed allocation site (to secure and enhance the pinch point in perpetuity)..	100	0
Seat_06 Former Depot, Colyford Road, Seaton	Already has planning permission for business units. An allocation for housing would lead to a loss of employment space contrary to the objectives of the plan.	0	0
Seat_07 Inc. Seat_12 Land at Colyford Road, Seaton	Southern part is outside flood zone 3 (high risk), but is affected by surface water flood risk. The site consists of optimal foraging habitat for Beer Quarry and Caves SAC bats and any losses of habitat would be required to be adequately compensated for within the Habitats Regulations Assessment (HRA) process. The owner of the site also owns the adjacent fields in the floodplain, which could be enhanced and managed in perpetuity for bats in order to compensate for bat habitat losses within HRA. At this stage there is insufficient assurance that flooding and ecological issues can be mitigated.	0	0

Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
Seat_08 Land Between Churston Rise and Couchill Copse, Seaton	The scale of development on this site would help deliver the district-wide housing requirement in a manner that is consistent with the spatial strategy. Reasonably good access to facilities and employment, but adverse landscape impact is principal reason for not allocating this site. The site also contains large amounts of rank grassland, scrub and encroaching woodland, which are valuable habitats for foraging and commuting bats associated with the Beer Quarry and Caves SAC, as well as other ecological receptors.	0	0
Seat_09 Land at Clay Common (Little Paddock), Seaton	The scale of development on this site would help deliver the district-wide housing requirement in a manner that is consistent with the spatial strategy. The site would contribute towards 10% of requirement on smaller sites. Reasonably good access to facilities and employment, medium/low landscape sensitivity, and minor heritage impact.	7	0
Seat_10 Land south of Beer Road, Seaton	The scale of development on this site would help deliver the district-wide housing requirement in a manner that is consistent with the spatial strategy. The site would contribute towards 10% of requirement on smaller sites. Reasonably good access to facilities and employment, but adverse landscape impact is principal reason for not allocating this site.	0	0
	<b>Totals</b>	<b>147</b>	<b>70</b>

## Sidmouth

- 4.31 Sidmouth has a very good range of services and facilities and a comparatively high number of jobs. There may be seen to be good strategic planning reasons to accommodate higher development levels in the town. However, the town is very highly constrained with the East Devon AONB abutting the urban edges of the town in many places and northern parts of the town (around the Waitrose supermarket) actually fall in the AONB. Apart from the beach (and sea) on the southern side of the town the one substantive part of Sidmouth that does not abut the AONB is the part that lies along the open parkland and spaces of the Byes, a cherished and valued open space area.
- 4.32 A total of 21 original sites, plus four new sites from the 2022 call for sites were identified at Sidmouth in Stage 1. These are shown on the map over the page. To note, other sites within adjacent lower Tier settlements use the site reference 'Sidm' therefore numbering is not sequential. These sites outside of the town / Tier 2 area will be considered in the next round of assessments.
- 4.33 In addition to the previously submitted sites, ten sites were submitted at Sidmouth in the recent (2022) call for sites. Five of these sites wholly overlap a number of the 21 original sites. The five remaining sites have not been fully assessed and may offer potential for development. The five sites include Kingdom Hall, Mill Street; Church Street Carpark, Sidford; Redwood Road, Sidmouth; Land at SY 12740 90095, North of Cornfields, Sidford; and a large residential site on land north of Sidford High Street to the east of site reference Sidm\_02.
- 4.34 This results in Sidmouth show that three sites are proposed for allocation in the Local Plan at the current time: Sidm\_01 (127 dwellings), Sidm\_06 (30 dwellings) and Sidm\_17 (11 dwellings).



## Site assessment map for Sidmouth

Sites coloured in Red (with some minor shading variations) are from calls for sites from 2017 and 2021.

Sites coloured in Purple are from the new Call for Sites from 2022.

It should be noted that there are a number of cases where submission sites overlay one another and there have been some re-submissions at various points. Mapping limitations mean that not all site specific boundaries are explicitly clear and Appendix 2 to this committee report should be referred to for a complete picture.

Sidm\_13 includes land shown in red as well as land to the south west of the identified site, west of Fortescue Road, see appendix for full details.

Mapping:

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Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
Sidm_01 Land south west of Woolbrook Road, Sidmouth	The scale of development (127 max yield) on this site would help deliver the district-wide housing requirement in a manner that is consistent with the spatial strategy. Good access to facilities and employment, high/medium landscape sensitivity (Located entirely within East Devon AONB however set in the context of modern residential development), and minor heritage impact. Ecological impacts relating to the unconfirmed wildlife site, nature recovery network area, and the site's location within both the Beer Quarry and Caves SAC bat consultation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone will need to be addressed in bringing the site forward, which may reduce the number of units that can be delivered on this site.	127	0
Sidm_02 Land at Sidford High Street, Sidmouth	Development of the site (124 max yield) would have a high landscape impact (Site within AONB with high intervisibility), no heritage impact but a significant adverse effect on ecology. There is good access to facilities and employment but poor existing access via a narrow lane onto the A3052. Adjacent site to east has come forward as part of call for sites (2022). The combination of Sidm_02 and the newly submitted 'land north of Sidford High Street to the east of site reference Sidm_02' has potential for significant delivery of housing, however it would require an improved access to A3052, and appropriate ecological mitigation. The impact on the landscape of the AONB is however a significant concern.	0	0
Sidm_04 Land to the east of The Lookout Coreway Sidford	Development of the site (30 max yield) would have a high landscape impact (Site within AONB with high intervisibility), minor heritage impact, minor adverse effect on ecology. Good access to facilities and employment.	0	0

Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
Sidm_06 Land west of Two Bridges Road, Sidford	Development of the site (268 max yield) would have a high landscape impact (Site within AONB with high intervisibility), major heritage impact, significant moderate adverse effect on ecology. Good access to facilities and employment. It is considered that the eastern side of this site could make a reasonable development option though at a much lower capacity than the site promoter is suggesting.	30	0
Sidm_12 The Hams, Fortescue Road, Sidford	Development of the site (62 max yield) would have a high landscape impact (Site within Byes, adjacent to PROW / river Sid), major heritage impact, significant moderate adverse effect on ecology. Good access to facilities and employment.	0	0
Sidm_13 (and larger area as submitted in the 2017 Call for Sites) - Land adjoining Fortescue Road, Sidmouth	Land shown as Sidm_13 on the map is proposed in submission for 43 homes and a hotel. Allied to this built development proposal the submission advises, on the land to the south west and west of Fortescue Road (south of sit Sidm_12) the proposed use and provision of land for a range of community, amenity and public access uses to include new paths and cycle links with a bridge over the River Sid, allotments, tree planting, a nature reserve and a new lake. It is assumed that the various uses would form a package of development that the landowner/HELLA submitter would wish to see coming forward together with the built development. In respect of the housing and hotel aspect of the proposal the site is very sensitive in landscape terms, falling in the East Devon AONB on rising land that is visually prominent from a wide range of public viewpoints. Allocation for development is not recommended.	0	0
Sidm_14 Land adj Stevens Cross Close, Sidford	Development of the site (15 max yield) would have a high landscape impact (Site within AONB with high intervisibility), no heritage impact, significant moderate adverse effect on ecology. Good access to facilities and employment. Valued view in Neighbourhood Plan would be impacted.	0	0

Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
Sidm_17 Peak Coach House, (Numbers 1-3 Belfry Cottages), Cotmaton Road, Sidmouth, Devon	The scale of development (11 max yield) on this site would help deliver the district-wide housing requirement in a manner that is consistent with the spatial strategy. Development would have a medium landscape impact (Site within AONB however set in the context of existing residential use / presence of sporadic dwellings in vicinity which provide context of limited built form), minor heritage impact (subject to development that conserves / enhances adjacent heritage value), significant moderate adverse effect on ecology. Good access to facilities and employment. Ecological impact relating to the identified features including the site's location within both the Beer Quarry and Caves SAC bat consultation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone will need to be addressed in bringing the site forward.	11	0
Sidm_19 Land at Dark Lane, Sidmouth	Development of the site (26 max yield) would have a high landscape impact (Site within AONB with high intervisibility), major heritage impact, significant moderate adverse effect on ecology (the site consists of a mosaic of scrub, ruderals and semi-mature woodland). Good access to facilities and employment. Poor access with narrow lanes adjacent to heritage.	0	0
Sidm_20 Station Yard, Station Road, Sidmouth	Development of the site (14 max yield) would have a medium / low landscape impact (impact upon AONB across the road (B3176) to west is a constraint), beneficial heritage impact, significant moderate adverse effect on ecology. Good access to facilities and employment. Loss of active employment site is a significant constraint on development.	0	0
Sidm_22 Alexandria Industrial Estate, Alexandria Road, Sidmouth	Development of the site (43 max yield) would have a medium / low landscape impact (impact upon AONB across the road (B3176) to west is a constraint), beneficial heritage impact, significant moderate adverse effect on ecology. Good access to facilities and employment. Loss of active employment site is a significant constraint on development.	0	0

Site ref	Summary commentary only (see appendix for fuller assessment)	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes
Sidm_24 Land east of Two Bridges Road, Sidford	Limited industrial development to east, extant economic development permission on adjacent site to south, and employment allocation of this site in the current Local Plan are highlighted. Residential development of the site would have a high/medium landscape impact (within AONB however set in context of approval to south and limited context of built form including industrial water treatment units to the east), major heritage impact (setting / appearance Sidbury Castle Scheduled Monument), significant moderate adverse effect on ecology. Good access to facilities and employment. Loss of allocated employment site is a significant constraint on mixed use development.	0	0
	<b>Totals</b>	<b>168</b>	<b>0</b>

## 5. Housing supply assessment and options for addressing the shortfall

5.2 Site assessment work undertaken to date reveals that if we just rely on the best performing and most suitable sites for allocation at the Tier 1 and 2 towns in East Devon, and add this to projections of what may come forward elsewhere based on initial assessments in the working draft local plan, there will be a significant shortfall in housing delivery when measured against Government requirements and the need to evidence flexibility.

### Forecast East Devon net housing supply

5.3 The table below provides the latest East Devon housing supply assessment. The housing supply forecast has been produced to provide initial evidence of potential sources of housing supply in the plan period, based on evidence about completions, commitments, windfalls, allocations at Cranbrook and potential allocations in East Devon.

5.4 This is the best estimate of supply at this stage in time but is work in progress. The forecast and analysis will be updated in the future when additional evidence is available such as the Housing Monitoring Update for the 2023 Monitoring Point, further assessment of emerging site allocations in light of responses to the Regulation 18 consultation on the Local Plan, and technical evidence including the Strategic Flood Risk Assessment and the Water Cycle Study.

**Table 1: Forecast East Devon net housing supply**

Supply Category (dwellings)	Net supply in plan period 1/4/2020 to 31/3/2040 (A)	Net supply after plan period 1/4/2040 onwards (B)	Net total housing supply (A+B)	% of Net supply in plan period (A/18,847 x 100)
Net completions 01/04/2020 to 31/03/2022 #	1,906	0	1,906	10.1
Net commitments at 31/03/2022 * \$	4,423	0	4,423	23.4
Cranbrook DPD Expansion Area Allocations ◆	4,170	0	4,170	22.2
2 <sup>nd</sup> new town	2,500	5,500	8,000	13.3
Urban extension north of Topsham^	650	0	650	3.5
Tier 1 & 2	1,777	0	1,777	9.4
Tier 3 & 4^	926	0	926	4.9
Windfall allowance ■ 01/04/2022 to 31/03/2040	2,495	0	2,495	13.2
<b>TOTAL</b>	<b>18,847</b>	<b>5,500</b>	<b>24,347</b>	<b>100</b>

Notes:

# As at 31/03/2022 (the 2022 Monitoring Point)

Source: HMU Table in para 3.12 Completions 867 (in 2020/21) + 1039 (in2021/22)

\* Total net commitments from planning permissions, including Cranbrook, that had not expired 31/03/2022 (excluding completions 01/04/2020 to 31/03/2022)

Source: 2022 HMU Table in para 3.12 Extant permissions = 4160 dwellings (2022 to 2031) and monitoring data shows 263 dwellings forecast for completions from 01/04/2031 onwards)

- § A small number of losses in commitments on small sites have not been deducted at this time, related to 'negative number' dwelling conversions or forecast future lapsed planning permissions on small sites
- ◆ Source: Cranbrook DPD (Main Modifications): Dwellings in Expansion Area (EA) allocations = 4170 dwellings comprising the follow Expansion Areas: Bluehayes EA 960 dws; Treasbeare EA 915 dws; The Cobdens EA 1,495 dws; Grange EA 800 dws. 2,500 dwellings forecast completions by 31/03/2040. After 1 April 2040 further development will continue taking the new town to a capacity of 8,000 new homes
- ^ Working estimate of supply category capacity comprising: up to 650 dws at Topsham; 414 dws at Tier 3 centres and 512 dws at Tier 4 centres (figures to be refined in next supply assessment)
- Windfall supply = 144+ 155 + 142 + (158 x13) = 2,495 dwellings (April 2024 to March 2040)  
Source: 2022 HMU Table in para 3.19, plus annual rate of 158 pa 01/04/2031 to 31/03/2040. The windfall allowance is mindful of the need to avoid overlaps with commitments. Currently, future delivery of supply on made Neighbourhood Plan allocations not yet benefitting from planning approval would be counted against this category.

- 5.5 The 1,777 dwellings supply at Tier 1 to 2 settlements shown in Table 1 are the sum of the preferred site allocations set out in this report. The figure **does not** include the dwellings on '2<sup>nd</sup> best' sites choices identified in this report.
- 5.6 In addition to the allocations at Tier 1 to 2 settlements proposed in this report, Table 1 uses information from the working draft local plan which proposed that provision through land allocations would come forward (up to 2040) at:
- A second new town – 2,500 dwellings (after 2040 further development will occur taking the new town to a capacity of 8,000 new homes;
  - Urban extension north of Topsham – up to 650 dwellings;
  - Provision at Tier 3 settlements – 414 dwellings;
  - Provision at Tier 4 settlements – 512 dwellings
- 5.7 Most of the supply identified in the supply categories would deliver in the plan period. The 2<sup>nd</sup> new town would deliver housing both in and after the plan period. Table 1 divides the total in each category into forecast supply delivery in the plan period and forecast supply after the plan period.
- 5.8 The following analysis focuses on: housing supply shortfall/surplus and headroom; the supply distribution and spatial strategy; data robustness, and implications of supply surplus/shortfall.
- a) Shortfall/surplus and headroom**
- 5.9 Comparing the forecast supply in the plan period against the housing requirement provides evidence of the amount of forecast supply shortfall or surplus. If the East Devon housing requirement is based on the latest East Devon local housing need (Government's standard method) of 946 pa then the requirement would be 18,920 dwellings for the plan period. That rate is based on the latest ONS statistics published in March 2022, and is higher than the previous figure of 918 pa.
- 5.10 The housing requirement may change in light of future ONS statistics which are published annually. It may also change in light of forthcoming evidence from the Economic Development Needs Assessment (currently work in progress), future evidence of the EDNA's impact on the East Devon Local Housing Need, and Members' consideration of that evidence.
- 5.11 It will also be necessary and critically important to consider the degree of supply 'headroom'. That is the amount of forecast supply in the plan period above the requirement as a percentage of the plan period requirement. Headroom is an indicator of supply flexibility and contingency provision, if some sites do not come forward in the plan period. This is necessary to provide evidence to meet the test of soundness about plan effectiveness. The

table shows that approximately 35% of the plan period supply relates to Cranbrook expansion areas and the 2nd new town. Submission of planning applications is a strong indicator of realistic prospects of delivery of the planned Cranbrook expansion. However, the second new town would equate to 13% of plan period supply and is at such an early stage in the development process, that a robust level of district supply headroom would be needed to mitigate the potential strategic risk of under delivery from this supply category.

- 5.12 A 10% supply headroom equates to a further 1,892 dwellings to be identified as potential supply that can be delivered in the plan period. This would mean evidence to demonstrate a potential supply of about 20,812 dwellings that could be delivered in the plan period. It is important to note that there is likely to be a need for the Sustainability Appraisal to test both a higher and lower headroom percentage to demonstrate the impact of supply headroom, and to demonstrate that the plan's policies on housing requirement and supply are justified.
- 5.13 Table 1 and the preferred site allocations proposed in this report, forecasts that 18,847 dwellings would be completed in East Devon in the plan period 2020 to 2040. A further 5,500 from supply relating to the 2nd new town would be completed after the end of the plan period.
- 5.14 The overall conclusions are that:
- At 18,847, the supply forecast to be delivered in the plan period from supply identified to date would be 73 dwellings below the plan period housing requirement of 18,920 dwellings. This would be just short of what is needed to meet the current Local Housing Need (standard method) and it provides no housing supply headroom. This does not provide evidence of supply flexibility.
  - To meet the housing requirement and demonstrate flexibility through a 10% supply headroom, would mean that a further 1,899 dwellings needs to be identified through additional site allocations that can deliver by 2040. This would bring the total net supply up to 20,812 dwellings (net) in the plan period.
- 5.15 If all the dwellings on '2<sup>nd</sup> best' sites choices identified in this report were also to be identified as site allocations (plus all the preferred choices), then supply would broadly match the requirement for the plan period (based on latest standard method need) plus a 10% headroom, and offer modest resilience to a potential rise in housing need related to future ONS statistics.

## **b) Supply distribution and spatial strategy**

- 5.16 Approximately 33.3% of the plan period supply is already identified from completions 2020 to 2022 and commitments at the 2022 Monitoring Point in East Devon. Another 13% is accounted for by the plan period district windfall allowance.
- 5.17 Table 1 also provides initial evidence about the distribution of the 53.3% of potential housing supply from allocations, in the context of the emerging spatial strategy, and in particular the settlement hierarchy. Potential supply from allocations in the plan period would comprise:
- Allocations in the western side of the District which are forecast to deliver 39% of plan period supply, comprising:
    - 22% at Cranbrook Expansion Areas
    - 13.3% at the preferred site allocation at the second new town
    - 3.5% at the preferred site allocations in the urban extension north of Topsham
  - 9.4% of plan period supply would be preferred site allocations at Tier 1 and 2 settlements, comprising:
    - 1.5% at the Tier 1 settlement (Exmouth); and
    - 7.9% in total at the Tier 2 settlements

- 4.9% of plan period supply would be from site allocations at Tiers 3 and 4 settlements (work is in progress to identify preferred site allocations).

5.18 Strategic conclusions from the above evidence and analysis are that:

- a) The scale of preferred site allocations in the supply categories is a reasonable fit overall with the settlement hierarchy, with 35.1% of supply at allocations in the new settlements, 9.4% at Tiers 1 and 2 settlements and 4.9% at Tiers 3 and 4 settlements. The urban extension north of Topsham would provide a further 3.5%.
- b) The 15.3% of supply in the plan period from the preferred site allocations in Tiers 1 to 4, are in addition to known supply in those Tiers from completions already delivered in the plan period and commitments yet to be delivered.
- c) There is a reasonable balance between supply certainty and flexibility. That is, about 87% of plan period supply would be from known sources (completions, commitments and preferred site allocations) and the 13% windfall allowance would be from future, as yet unidentified, windfalls.

5.19 Further housing supply identified from the 'second best sites' would change the supply category percentages, and may change some of the above conclusions.

### **c) Data robustness**

5.20 The calculation of forecast housing supply is sufficiently robust at this stage of plan preparation because:

- Tabled data is based on the whole of East Devon District, including Cranbrook. The housing supply forecast is the sum of supply from housing supply categories. The categories are mutually exclusive so there is no overlap in the supply categories and no double-counting.
- The settlement tiers and urban extension north of Topsham are based on the emerging Local Plan settlement hierarchy.
- The latest available data is used for supply from housing completions, commitments from planning permissions, and in calculating an annual windfall allowance. This uses information from the East Devon Housing Monitoring update 2022, based on the 2022 Monitoring Point (i.e. 31 March 2022).
- At this stage of plan-making no sites proposed as potential allocations in the emerging Local Plan benefit from planning permission.
- Housing supply is based on dwellings, on a 'net' basis, accounting for gains and losses of dwellings, unless indicated otherwise.
- For this analysis, a conversion factor of 1.8 is applied to convert bed spaces in Residential Institutions to dwelling equivalents, which are included in the net housing supply in Table 1. This is consistent with the latest Housing Flows Reconciliation Return methodology for national statistics.
- Table 1 does not include Gypsies and Travellers and Travelling Show people pitches. There will be a separate analysis of pitch supply and need when the Gypsy and Traveller Accommodation Assessment evidence is available.

5.21 Work is in progress on the following which will inform refinement of the housing supply forecasts for the Local Plan:

- Tiers 3 and 4 allocations
- Development of the second new town options.

- Finalising the HELAA evidence on supply sources, and the availability and achievability of sites
- Updating site selection to take account of emerging evidence such as the Strategic Flood Risk Assessment and Water Cycle Study.

5.22 Further updates of housing supply will be undertaken when the 2023 Housing Monitoring Update is available and the Local Plan housing trajectory is updated, including its audit trail of engagement with builders/developers and landowners.

**d) Implications of supply shortfall/surplus**

5.23 Under the assessment set out above based on preferred allocations in the towns, there is an identified housing shortfall to 2040 of **1,899** new homes. Should we ultimately need to set a later plan end date (this might be needed if we are to have an end date that is at least 15 years after adoption) then overall requirements would be expected to go up, mindful that some of the additional requirement would be met by the 2<sup>nd</sup> new town where development would continue after 31 March 2040.

5.24 The table below shows the full quantum of preferred housing allocations and suggested '2<sup>nd</sup> best' levels of allocations at the towns of East Devon.

Town	Preferred Allocation - Homes	Potential '2 <sup>nd</sup> Best' Allocation - Homes	Preferred plus '2 <sup>nd</sup> Best' Total
Exmouth	287	746	1,033
Axminster	745	370	1,115
Honiton	182	346	528
Ottery St Mary	248	40	288
Seaton	147	70	217
Sidmouth	168	0	168
<b>Totals</b>	<b>1,777</b>	<b>1,572</b>	<b>3,349</b>

5.25 In order to address the shortfall there are a series of suggested options that might be followed and a combination may be appropriate, these are summarised below and members are invited to provide clarity on the appropriate way forward:

**Option 1 – Allocate additional '2<sup>nd</sup> best' sites at Tier 1 and 2 settlements.** We have identified '2<sup>nd</sup> best' sites options as we are of the view that it is unlikely that other options alone (set out below) will be credible choices to make up the total shortfall. Though in addition Committee may wish to look to other town based sites that do not feature as officer favoured or '2<sup>nd</sup> best' choices as possible allocations in the plan,

**Option 2 – Provide for modest additional housing at Tier 3 and 4 settlements.** We have drawn on proposed policy in the working draft local plan to identify the housing supply that may come forward outside of Option 1 above. Whilst site options are yet to be tested (as has been undertaken for Tier 1 and 2 settlements in this report and supporting work) there may be some scope to increase housing provision generally across Tier 3 and 4 settlements, but more detailed assessment could also raise concerns about whether the scale of development is credible. It is suggested that if additional capacity could be found then it is unlikely to address the full shortfall. Furthermore the plan is being developed on the basis of directing development to the locations that have the biggest and best range of services and facilities

(the Tier 1 and 2 settlements) or where such facilities can be provided (at a second new town or on sites close to Exeter). Greater levels of development at Tier 3 and 4 settlements would run counter to this strategic approach and would be likely to be less sustainable and have a higher carbon footprint. To look elsewhere in rural areas, beyond Tier 4, would run even further counter to this approach.

**Option 3 – Focus strategic scale development at selected Tier 3 and 4 settlements.**

Under this option we could look to selected Tier 3 and 4 settlements to accommodate strategic scale development (housing numbers in the 100s rather than, for example, in the 10s). Some Tier 3 and 4 settlements are less environmentally constrained than others and less so than some towns. For example significant land areas have been promoted for development at **Feniton** and **Whimble** and one, other or both of these settlements could accommodate larger scale development schemes. Both of these villages are relatively close to Exeter, they have railway stations and they fall some distance from AONBs and from the highest tier of wildlife sites. Large scale development could help secure extra services and facilities to the benefit of the wider community.

**Option 4 – Increase housing density on land allocations.** To date we have modelled housing capacity on reasonably typical standard density levels, though in some cases we have adjusted density levels (typically downward) to take into account site specific characteristics. But there could be some scope to look at higher density levels on some sites. Doing so, without causing possible adverse impacts, could address a part of the shortfall, but it is suggested that it is unlikely to meet all needs, or perhaps not even have a significant impact. Furthermore, we have not comprehensively taken account of scope for mixed use developments, specifically including provision of employment land on some development sites. Identifying deliverable employment land to allocate through the local plan presents significant challenges and our expectation is that, to some degree at least, it can be best achieved through mixed use development sites. On larger sites therefore we are likely to recommend mixed use development, it has the attraction of co-locating uses close together, so amongst other objectives reducing need to travel, but it is likely to reduce rather than increase housing yields.

**Option 5 – revisit urban intensification options.** We undertook a second call for sites, completed earlier in 2022, in part at least in order to understand if there were significant and genuine options to increase redevelopment and urban intensification in East Devon Towns. The call for sites generated some additional site options and these are yet to be fully investigated. However many were small in scale and also some were located in floodplains (notably in Exmouth) or had other significant constraints. From preliminary review extra sites submitted at the Tier 1 and 2 towns may offer some scope for additional new homes, but it is suggested that potential is modest at best and would make limited impact on addressing the unmet need. These conclusions align with work done as part of the urban capacity study where relatively few sites were identified and these were small and would yield few new homes.

There would be an option to comprehensively revisit urban intensification options again – but this would take time and could delay local plan production considerably and it is far from guaranteed that it could generate new significant opportunities or indeed how appropriate, viable or desirable such opportunities may be.

**Option 6 – look to expand Cranbrook further.** The working draft local plan advocates a policy approach that does not seek to expand Cranbrook any further than provision made

through the Cranbrook Plan. However there could be scope (not recommended) to revisit this approach and expand Cranbrook further and beyond that already committed. However, whether this may actually increase housing delivery is questionable as build rates at Cranbrook will already be informed by market demand and just providing extra sites would not in its own right shift the market demand side of the equation. Ultimately there will be a maximum number of homes that the market could reasonably deliver at Cranbrook and simply allocating more will not necessarily increase supply.

5.26 Summary assessment indicates, based on best available current information, that there is going to be a housing shortfall and officer recommendation is that, to some degree at least, if not a large degree, it will be desirable to seek to allocate some perhaps if not all of the '2<sup>nd</sup> best' site choices at towns (Tier 1 and 2 settlements) this would be even more appropriate should some of the officer favoured site choices at towns be dismissed by Members and rejected from inclusion in the plan.

5.27 In respect of the desirability for further allocations it is relevant to note that the working draft plan has a hierarchy that places existing towns in the highest bracket. The hierarchy may be read to infer (though does not explicitly state) that the towns are strategically important locations to accommodate greater levels of housing development, but in some towns development levels on preferred sites are comparatively low. Exmouth, as a notable example, accommodates over 20% of the existing residents of East Devon but proposed favoured allocations at the town would account for a significantly lower proportionate level of projected future development. Whilst some site choices in Exmouth (and elsewhere) may be far from ideal the options available do need to be seen within the context of a wider plan strategy. Delivering development to accord with the plan strategy will need to be weighed in the decision making process against and alongside available site options. It can be appropriate to allocate less good sites in given towns or locations if they will help deliver a strategy rather than potentially better sites elsewhere if those sites do not help deliver the strategy.

## **6. Next steps**

6.2 Sites at Tiers 3 and 4 of the settlement hierarchy will be considered for allocation at SPC on September 9 and 14. The proposed new settlement and other sites close to Exeter will be discussed at the same SPC that considers the Preferred Options consultation draft Local Plan, on October 4 2022. As highlighted previously, it is only when all sites across East Devon have been assessed that we will have a full picture as to whether we are allocating sufficient sites to meet development needs. Therefore, the October SPC may see different conclusions for some sites, if subsequent work shows that too few (or even too many) sites are being proposed for allocation or extra information on sites is identified.

6.3 All proposed site allocations, plus the alternative sites that are not currently being proposed to allocate, will then be subject to public consultation on the Preferred Options consultation draft Local Plan, to be held from mid-October to December 2022. The consultation responses will be considered in revising the Local Plan, which could include additional site suggestions or evidence causes us to reconsider the proposed allocations or alternatives.

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**Financial implications:**

There are no specific financial implications impacting upon council finances as a result of the report as it is in line with current budgets. As a council with an HRA, the impact of housing needs is significant both within the general fund, for example in terms of temporary accommodation requirements and primarily within the HRA to meet the need for social and affordable housing. Additionally development in the district also benefits the council financially both through the growth itself in council tax receipts etc. as well as through government incentive schemes such as New Homes Bonus.

**Legal implications:**

There is no direct comment to be made in relation to this report, each and any individual issue will need to be considered as it arises in respect of each issue as it comes forward.