

Report to: Strategic Planning Committee



Date of Meeting: 30 April 2024

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Exemption applied: None

Review date for release N/A

Green Wedge policy boundaries in the new Local Plan

Report summary:

At the 3 October 2023 and 13 February 2024 meetings, this committee considered reports in respect of Green Wedge designations. The Green Wedges to be designated between nearby settlements which could, through development, be at risk of coalescence or loss of identity. Members resolved, at the 13 February meeting, that the potential Green Wedges be reported back to them, following a workshop, for further consideration. This report follows on from the workshop and sets out in detail a potential option for consultation on Green Wedges which is based on Members views expressed at the workshop. An alternative option based on Officers previous work on this matter is presented as an alternative.

It is proposed that Green Wedges be subject to public consultation in Spring 2024. The report seeks instruction from Committee on which option (or possible alternatives) committee wish to identify that we should consult on.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

That Strategic Planning Committee agree the proposed policy wording and boundaries in relation to Green Wedges in the new Local Plan be consulted on.

Reason for recommendation:

To ensure that Green Wedges continue to place restrictions on potential for development between settlements where such development is seen as potentially leading to or contributing to potential for settlement coalescence. The consultation will ensure the public are given an opportunity to comment on proposals as part of the local plan production process.

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Portfolio(s) (check which apply):

Climate Action and Emergency Response

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

Equalities impact Low Impact

Climate change Low Impact

Risk: Medium Risk; It is important that we set out how Green Wedges boundaries are to be defined to ensure a rational process is followed and can subsequently be justified. It is important that the public are given the opportunity to provide feedback in response to the draft proposals. If Green Wedge boundaries are not based on sufficient, robust, evidence there is a risk that the Local Plan examination could be delayed or otherwise negatively affected.

Links to background information

Link to [Council Plan](#)

Priorities (check which apply)

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

1. Introduction

- 1.1 The current Local Plan contains a number of Green Wedges. These are areas of land that are locally designated through the local plan making process. As part of the local plan review, the policy and designations must be reassessed to ensure that they remain proportionate and appropriate.
- 1.2 General policies controlling development in the countryside apply in Green Wedges (Green Wedge boundaries are drawn falling outside of development boundaries), but, in addition, there is a qualified general presumption against development which is inappropriate within them in relation to the policy purpose of the Green Wedge.
- 1.3 In East Devon, in locations where settlements are in close proximity and where there is considerable pressure for new development, it has been identified as being necessary to have additional Green Wedge protection. The Green Wedges are spatially defined around areas that are important to prevent settlement coalescence (if development were to go ahead) and to

maintain separate settlement identities. The Green Wedge will perform a strategic function, and therefore be considered a strategic Local Plan policy, as a buffer between areas of existing built development in order to prevent coalescence. These areas are intended to protect features or areas that are seen as relevant and important in respect of preventing coalescence or loss of identity.

- 1.4 Notwithstanding that Green Wedge designations are proposed, the countryside protection policies will continue to also apply in designated areas and as such there will be an additional layer of general presumption against development in these areas. There are also a number of other policies that are restrictive of development that apply in Green Wedge areas such as Coastal Preservation Areas, Flood Zones etc.
- 1.5 It should be noted that the Green Wedge boundaries in the current adopted local plan were shown indicatively as part of the Regulation 18 consultation that ran from November 2022 to January 2023 on the draft local plan. Though where there were proposed built development site allocations in that plan they were **not** shown as proposed Green Wedge areas. But that consultation did not include Neighbourhood Plan equivalent boundaries.
- 1.6 We produced a feedback report on comments received in response to the draft local plan consultation - <https://eastdevon.gov.uk/media/a2dftt10/accessible-reg-18-consultation-feedback-report-spring-2023.pdf>. By way of very succinct over view commentary, in respect of Green Wedges, this report advised that *“The policy for protection of green wedges was well supported, however numerous respondents expressed concern that existing green wedges are being eroded and coalescence is already taking place/will take place as a result of proposed allocations.”*
- 1.7 However, we would stress that Green Wedges did not get universal support. The consultation report sets out that some respondents questioned the need and appropriateness for Green Wedges and how they were or are to be defined. Page 430 to 431 of the feedback report should be read for a fuller summary view of consultation responses and more so full responses received should be read in their entirety. It is also appropriate to consider feedback in the context of the wording and maps in the draft local plan that was consulted on.
- 1.8 The fact that views were expressed opposing the green wedges is significant. If these objections or indeed others are maintained through consultation on the proposed boundaries then they would be a matter that an inspector in examining the plan would need to give detailed consideration to.

2. Current Position with regard to the emerging Local Plan

- 2.1 The Green Wedge policy in the adopted local plan has two main objectives, to:

- protect the separate character and identity of settlements in close proximity and
- prevent their coalescence.

The adopted policy states:

“Strategy 8 - Development in Green Wedges

Within Green Wedges, as defined on the Proposal Map, development will not be permitted if it would add to existing sporadic or isolated development or damage the individual identity of a settlement or could lead to or encourage settlement coalescence.”

- 2.2 Members have indicated that, as Green Wedges have a very high level of local support and Members note a history of them being supported by Inspectors at appeal and at previous local plan examinations, they wish to see policy provision in the emerging Local Plan. We also note support for equivalent areas, which feature in adopted Neighbourhood Plans, to be designated as Green Wedges in the emerging Local Plan.

3. Consultation on Green Wedges

- 3.1 On the 13 February 2024 Strategic Planning Committee received a report recommending consultation on proposed Green Wedges that were set out in the report. Some of the Green Wedges were substantially smaller than those featuring in the existing Local Plan. It is important to note, however, that the suggested policy wording (i.e. the development that would be permitted within them) was substantially more restrictive than that which is allowed for in Green Wedges in the adopted Local Plan.

- 3.2 Two of the four resolutions of Committee on the 13 February 2024 [Agenda item - Designation of Green Wedges in the new Local Plan - East Devon](#) have a direct relevance to future work on Green Wedges, these are:

1. That Strategic Planning Committee cannot agree that the draft Green Wedges as presented are drawn in accordance with the intent of the Committee or with the spirit of the proposed policy.
2. That the Assistant Director for Planning Strategy and Development Management in consultant with the Chair and Vice Chair of Strategic Planning Committee, urgently review the methodology, proposed policy wording and proposed boundaries in light of the issues raised by Committee. With particular regard to accounting for non-visual, intrinsic settlement separation and with input from Ward Members and bring a revised proposal with relevant evidence to a workshop with all Committee Members invited, with conclusions and recommendations brought back to

Committee as soon as possible for consideration prior to Regulation 18 consultation.

- 3.3 In respect of the second resolution a member workshop was held on the 5 March 2024. At this workshop Members challenged proposed amendments being made to existing Green Wedges as set out in the officer report to Committee on 13 February 2024. Members stressed the length of time that existing local plan Green Wedges have been in place and the level of public support and public understanding that they enjoy. It was highlighted that Green Wedges help establish and positively shape a sense of place and that an intrinsic sense of separation of settlements is a critical concern in their definition.
- 3.4 The resolutions of committee on the 13th February and the views expressed at the Member workshop are noted and so this report has been prepared on the assumption that Members wish to retain the existing green wedges as much as possible. There are however risks associated with this approach.
- 3.5 In reaching a decision on the favoured consultation approach committee should bear in mind that all and any planning policy should be evidence based. This is one of the key considerations that will be taken into account at plan Examination. At Examination a planning inspector will also consider whether policy accords with Government policy and guidance. The more any policy approach may deviate from or not accord with such guidance (noting that this can be expected to include where policy or guidance is silent on a matter) the stronger the evidence for doing so may be expected to have to be. In the case of green wedges there is no mention of them in government policy or guidance and so there is a danger that an inspector will require some convincing of the need for them and their extents.
- 3.6 Where a planning inspector is not satisfied with the Planning Authority position the inspector, as a worst-case scenario, could set out that the plan cannot be adopted and that plan making should effectively start again. A more common scenario, where significant concerns arise, is that an Inspector will ask a planning authority to go away, reconsider their policy position, potentially gather and present further evidence and then come back to present their position (with any changes – if relevant) and there can also be expected to be a need for further public consultation. A less severe intervention (change) by an Inspector would be to recommend what are called Main Modifications to a plan – where this occurs an inspector would highlight changes that they see relevant to ensure that the plan can be deemed sound. Main Modifications (which are almost inevitable for any plan at Examination) will need to be consulted on.
- 3.7 A concern we would highlight is that the Government have previously advised of changes to the plan making system and that for plans to be adopted under

the current system they will need to be adopted before the end of December 2026. We have worked out a plan making timetable around this end date, but we would highlight that timing margins are very tight and delays could see the plan slip beyond such deadlines.

- 3.8 The proposed approach therefore has some risks associated with it. To try and mitigate the risk of challenge it is suggested that policy wording more closely reflect that in the existing Local Plan than that previously suggested. The previously suggested more definitive policy wording was only considered appropriate due to the more limited extent of the green wedges proposed at that time. The extent of the green wedges now proposed and the evidence available would not justify such a robust and definitive policy position as previously set out with the proposed reduced green wedge boundaries.

4. The areas where Green Wedges are proposed

- 4.1 Noting that there was support for existing green wedges at the [Regulation 18 Consultation](#), and that some respondents were concerned that they are being eroded by development we suggest locations with a Green Wedge in the existing adopted local plan should also have Green Wedges in the new local plan. In addition, and from past discussion, it appeared clear that Members consider that the equivalent policy designations in adopted Neighbourhood Plans should also be identified as Green Wedges to give them the same recognition and protection. This means that Green Wedges would be designated in the following areas:

- a) *Land between Beer and Seaton**
- b) *Land between Budleigh Salterton and Knowle*
- c) *Land between Colyford and Colyton*
- d) *Land between Seaton and Colyford*
- e) *Land east of Exeter*
- f) *Land between Exmouth and Lympstone*
- g) *Land between Lympstone and Exton*
- h) *Land between Ottery St Mary and West Hill**
- i) *Land between Poltimore and Westclyst*
- j) *Land between Rockbeare and Cranbrook*
- k) *Land between Sidbury and Sidford**
- l) *Land between Whimble and Cranbrook*

Asterisks indicate areas identified through adopted neighbourhood plans only, where there is no Green Wedge identified in the Local Plan. It should be noted that some adopted Neighbourhood Plans include their own policies which relate to the parts of the Local Plan Green Wedge areas that lie within their Neighbourhood Areas and they do not designate their own, separate Green Wedge equivalents. In most cases the Neighbourhood Plan policies have common objectives and are very similarly worded to the Green Wedge policies but some go further in their protection of landscape.

4.2 We have not identified any further settlements, in particular larger settlements, that are sufficiently close together where coalescence, or concerns around coalescence, are such to warrant further designations. We do not consider that further designations are justified at this time.

5. Green Wedge Boundaries and potential areas for exclusion (including recent development, the Cranbrook Plan area and potential development allocations)

5.1 Looking at the Green Wedges in the currently adopted local plan they are substantially unaffected by development and they can be seen to contribute to the sense of openness between settlements and/or the protection of their character and identity. There are, however, some changes (specifically developments) that have taken place since the Green Wedges were initially drafted. Inclusion of such newly developed areas in the Green Wedges could weaken plan policy and is simply seen as inappropriate. In addition, some of the historic boundaries were not drafted using modern Geographical Information System (GIS) mapping and are now seen to be imprecise. Therefore, it is recommended that as a minimum some minor changes are made to existing Green Wedges.

Historic drafting anomalies

5.2 Members are asked to agree that minor boundary formatting issues can be corrected as the plans are drawn for the consultation, for example, to the northern edge of the Poltimore Green Wedge where the boundary should follow the southern edge of the road and exclude the Church and adjoining cottages:

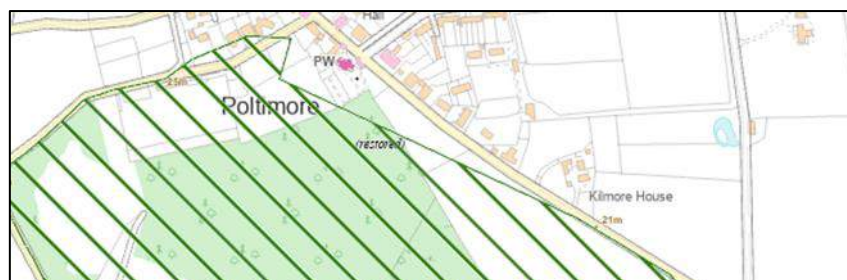
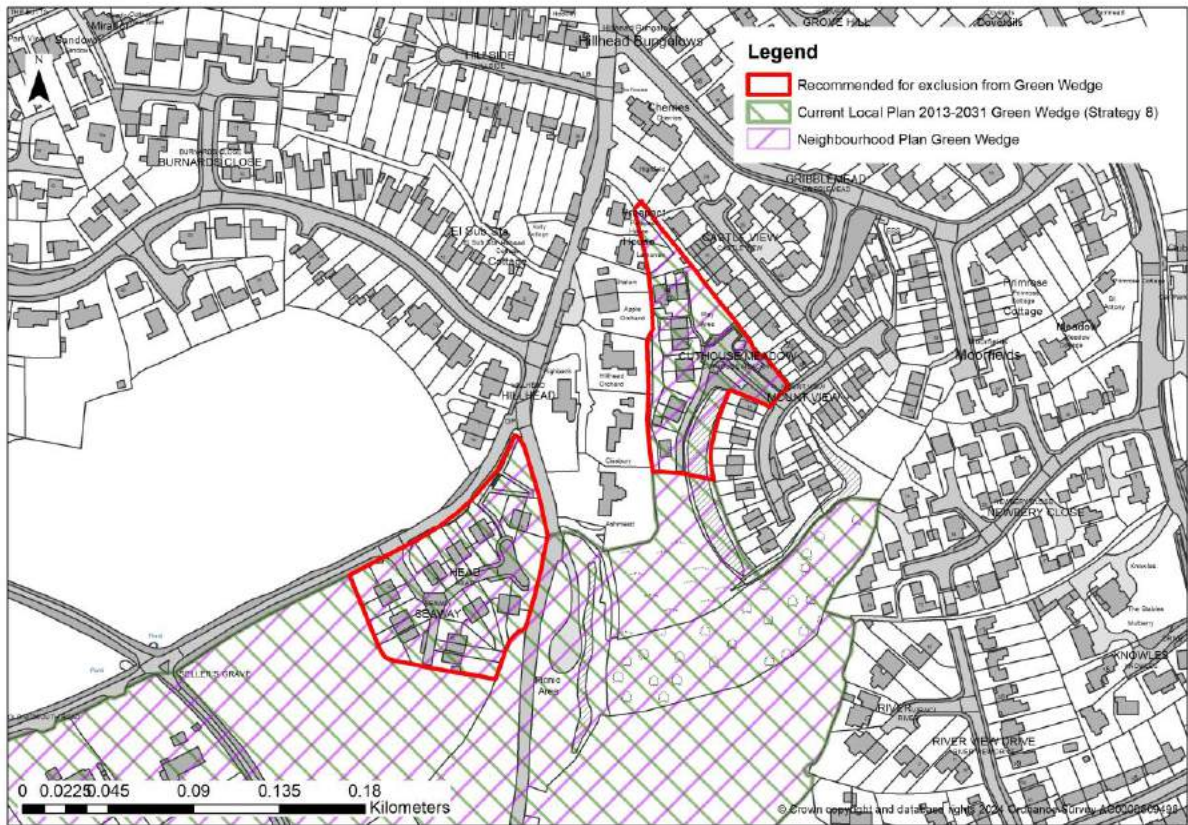


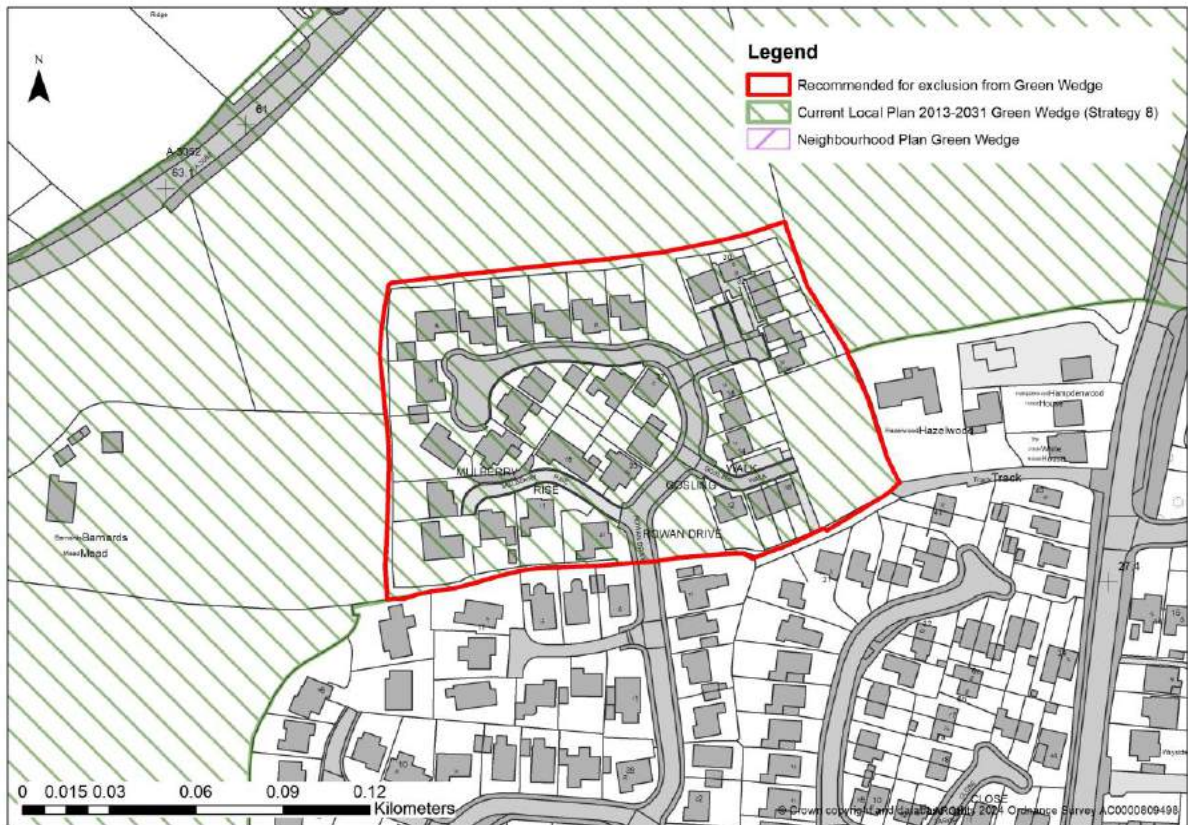
Figure 1: Cartographical error example on Land between Poltimore and Westclyst

Exclusion of significant development within Green Wedges

5.3 To ensure that the policy is as robust as possible, Members are asked to agree that areas of development (where of a more significant scale), particularly those that have taken place since the Green Wedges were first drawn, are excluded from the Green Wedges to be consulted on. These are as follows below/over the page.



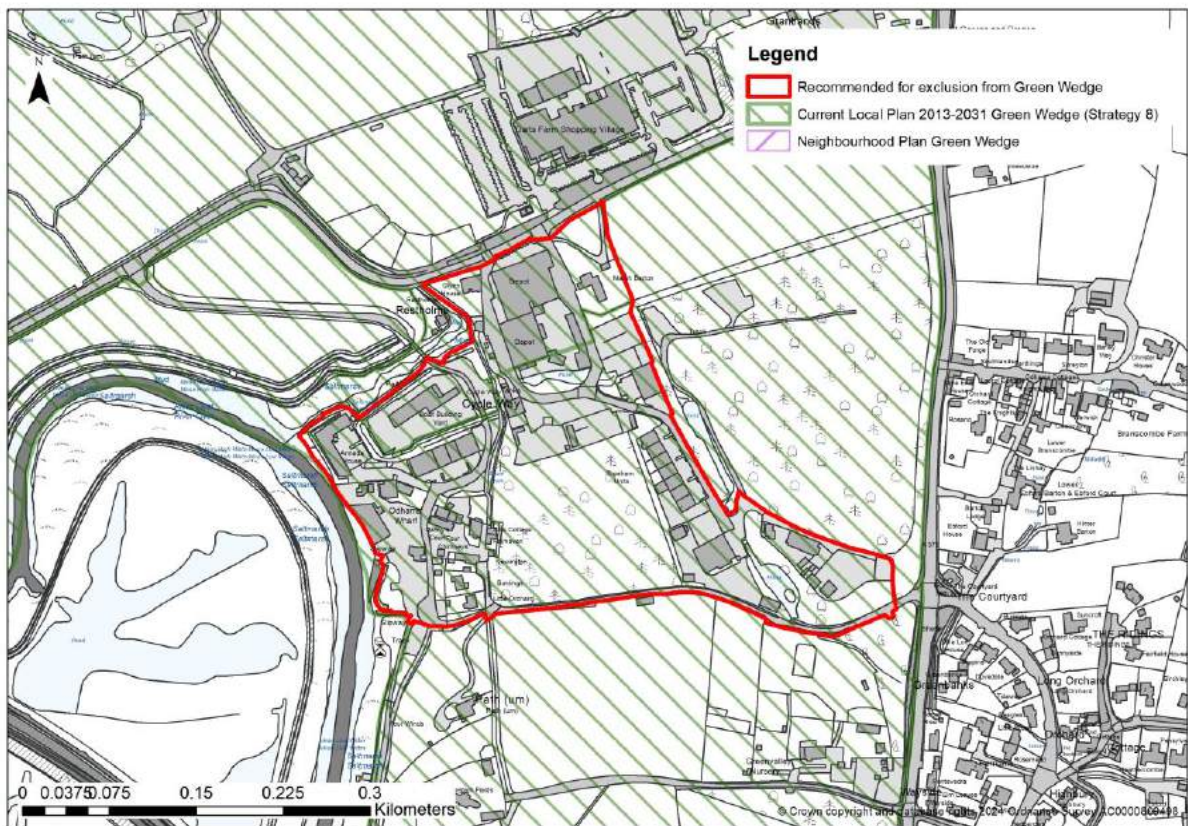
*Figure 2: Land between Colyford and Colyton –
exclude Seaway Head and Cuthouse Meadow, Colyton*



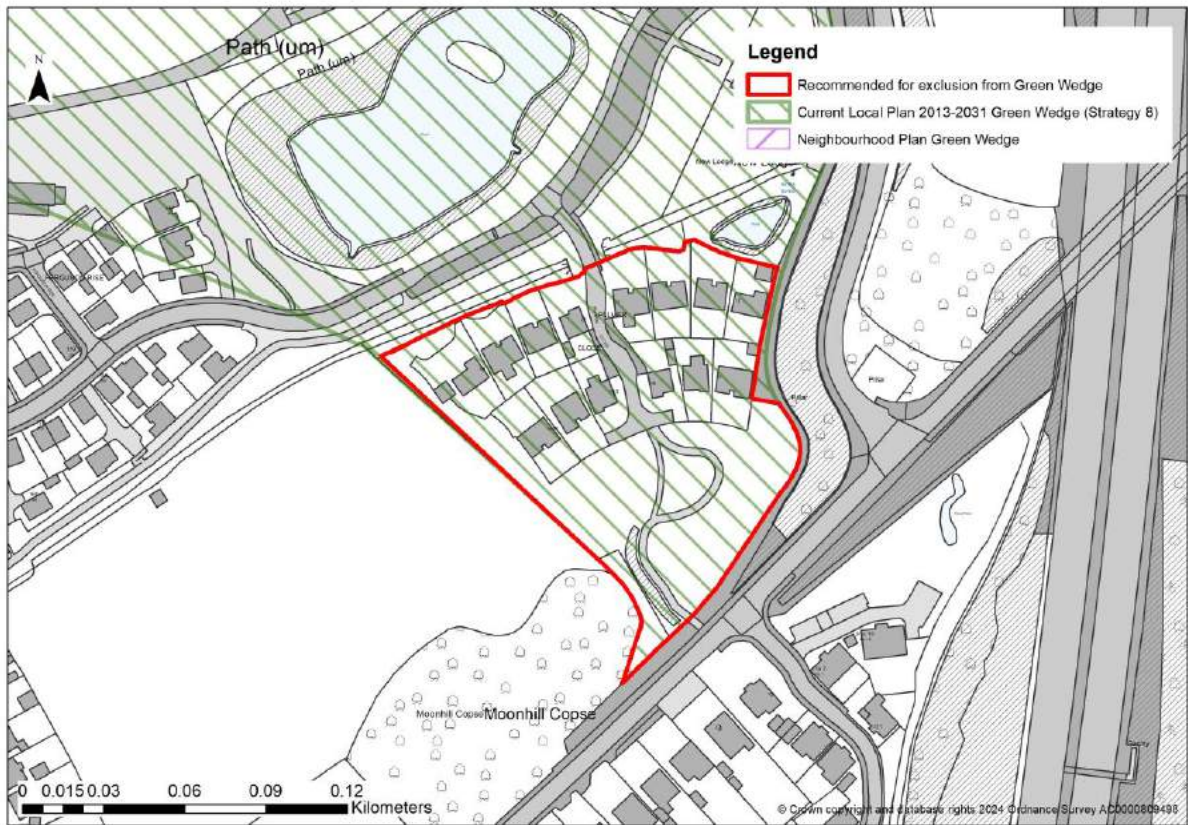
*Figure 3: Land between Seaton and Colyford –
exclude Rowan Drive, Mulberry Road and Gosling Walk, Seaton*



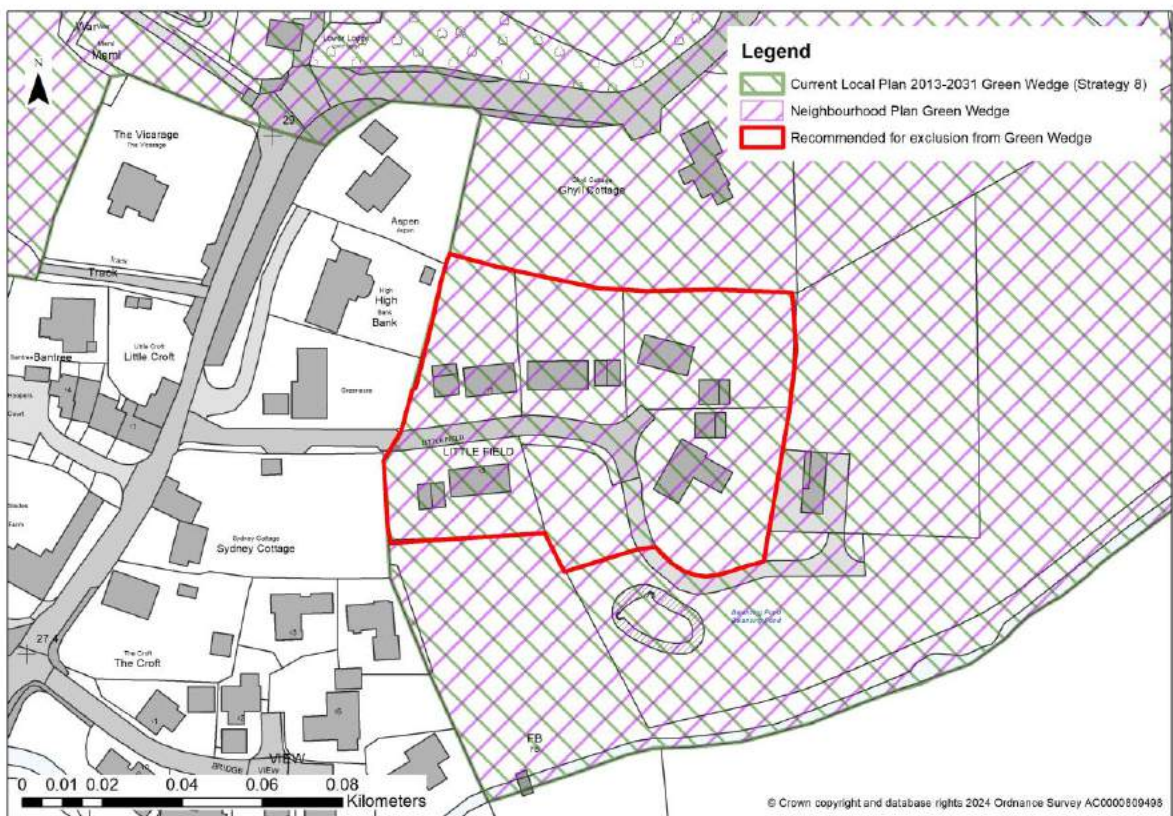
*Figure 4: Land between Seaton and Colyford –
exclude Roger's Way and Potter's Way, Seaton*



*Figure 5: Land east of Exeter –
around Dart's Farm and employment site*



*Figure 6: Land between Poltimore and Westclyst –
exclude development to the SE corner (Palmer Close, Westclyst)*



*Figure 7: Land between Rockbears and Cranbrook –
exclude Little Field, Rockbears*

Exclusion of proposed development allocations within Green Wedges

- 5.4 In considering the proposals for consultation, Members should be aware that there is an overlap between the Green Wedge designation and some of the preferred/proposed development allocations as featured in the draft local plan. This is based on officers' initial assessment that these sites were appropriate acknowledging their location within Green Wedges. Unfortunately, insufficient sites are available outside of designated areas to accommodate the needs of the district and so it is inevitable that some sites will need to be allocated in these areas. It is however acknowledged that it will be important to ensure that areas that are most important to maintaining the purposes of the Green Wedges are not allocated for development. Despite this allocating land in Green Wedges raises a potential conflict with the objective of the Green Wedges – “to **protect the separate character and identity of settlements in close proximity** and **prevent their coalescence**”.
- 5.5 At this stage the Green Wedge designations are in a draft consultation version. The proposed consultation material acknowledges that the boundaries may need to be amended to reflect development allocations but, as these are not yet finalised, it is based on the Green Wedge areas as proposed at the present time. This carries the significant risk that respondents may be confused by this position. To address this officers have included a question within the consultation materials that seeks views on the specific issue of allocating land for development within the Green Wedges.
- 5.6 Members will need to ultimately decide whether these sites should be included in a Green Wedge (as is currently proposed on the consultation maps, below/over the page) and, if so, should they be allocated or not be allocated for development. If land within a Green Wedge is to be allocated for development then it would make sense to remove it from the Green Wedge designation. Ultimately this is likely to depend on assessment of whether, on balance, the need and justification for development outweighs the case for inclusion in the Green Wedge.
- 5.7 It is highlighted that meeting housing needs is a fundamental concern and it is acknowledged that it presents significant challenges. In the draft local plan we set out a housing supply position that met Government standard method target levels (as applied at the time) but fell a little way short of meeting these targets plus a 10% additional buffer. Should it be deemed that allocation of all development sites in the identified Green Wedges in the draft plan is ultimately inappropriate it would remove around 1,100 dwellings from the housing supply side of the calculations. This is a very significant level of housing provision and it would be very challenging to identify how or where new provision of around this scale could be accommodated to meet such a shortfall.

5.8 Meeting any shortfall challenge would be further exacerbated should members choose to not pursue other allocation sites that appeared in the draft local plan. Noting, for example, that there were around 1,000 homes allocated in National Landscapes that are not in Green Wedge areas (around 80 were in both). National Landscapes (also known as Areas of Outstanding Natural Beauty/AONBs) receive specific and clearly defined high levels of protection in government policy and as their name clearly establishes they are of national landscapes importance (in this respect of equivalence to National Parks). Allocating land for development in National Landscapes is far from ideal but if housing needs in communities such as Sidmouth (which is surrounded by National landscape) and Budleigh Salterton (which is washed over by National Landscape) are to be addressed then allocations in these areas will be necessary. Clearly sites which minimise the impact on the national landscapes should be favoured.

5.9 At this stage it is suggested, based on previous discussions with Members, that the full extent of the Green Wedges, as currently existing (to include Neighbourhood Plan equivalent designations but to exclude areas of development, as above) be subject to consultation. Any further amendments to boundaries would then be decided, based on the outcome of the consultation, before final decisions on site allocations prior to the Regulation 19 consultation. The affected sites are as set out below/over the pages.

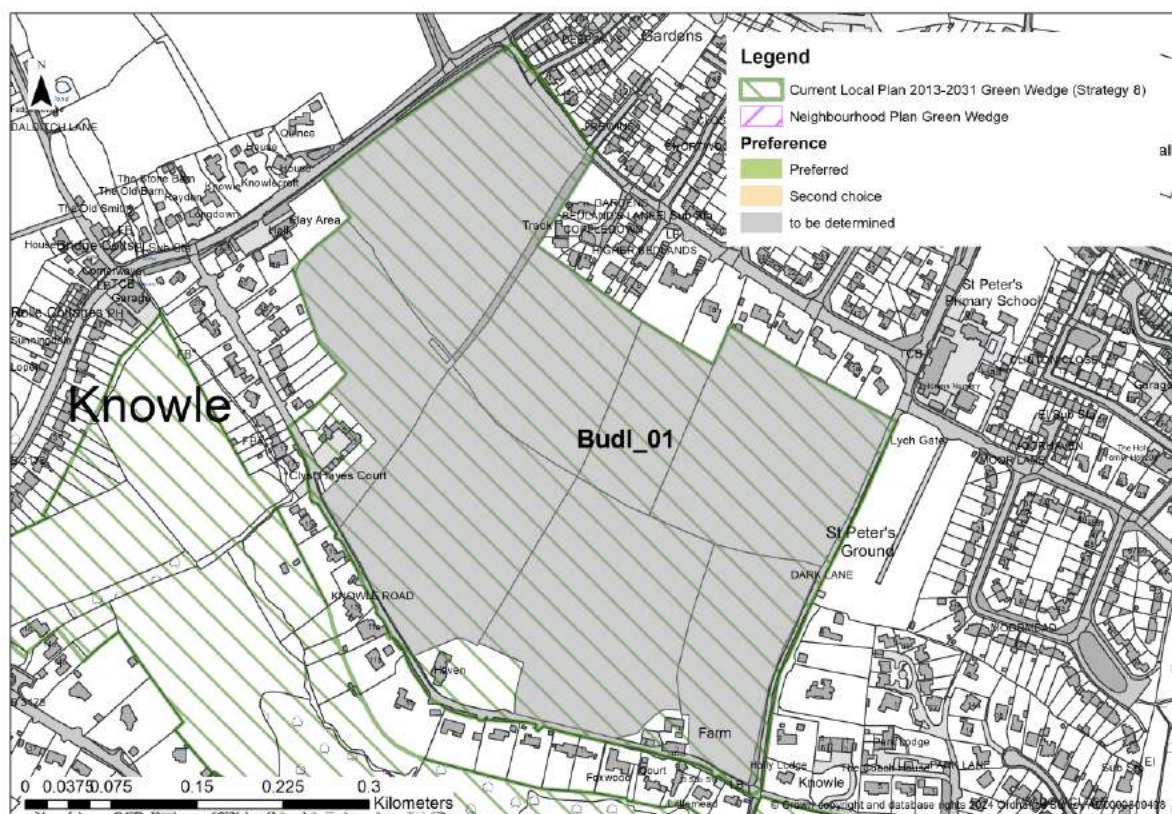


Figure 8: Land between Budleigh Salterton and Knowle – Budl_01 (to be determined) 50 dwellings and 0.2 hectares of employment land (in this particular instance an actual site boundary has not yet been defined but the development would sit somewhere in the identified Green Wedge).



Figure 9: Land between Seaton and Colyford –
Seat_02 (Preferred allocation) 40 dwellings

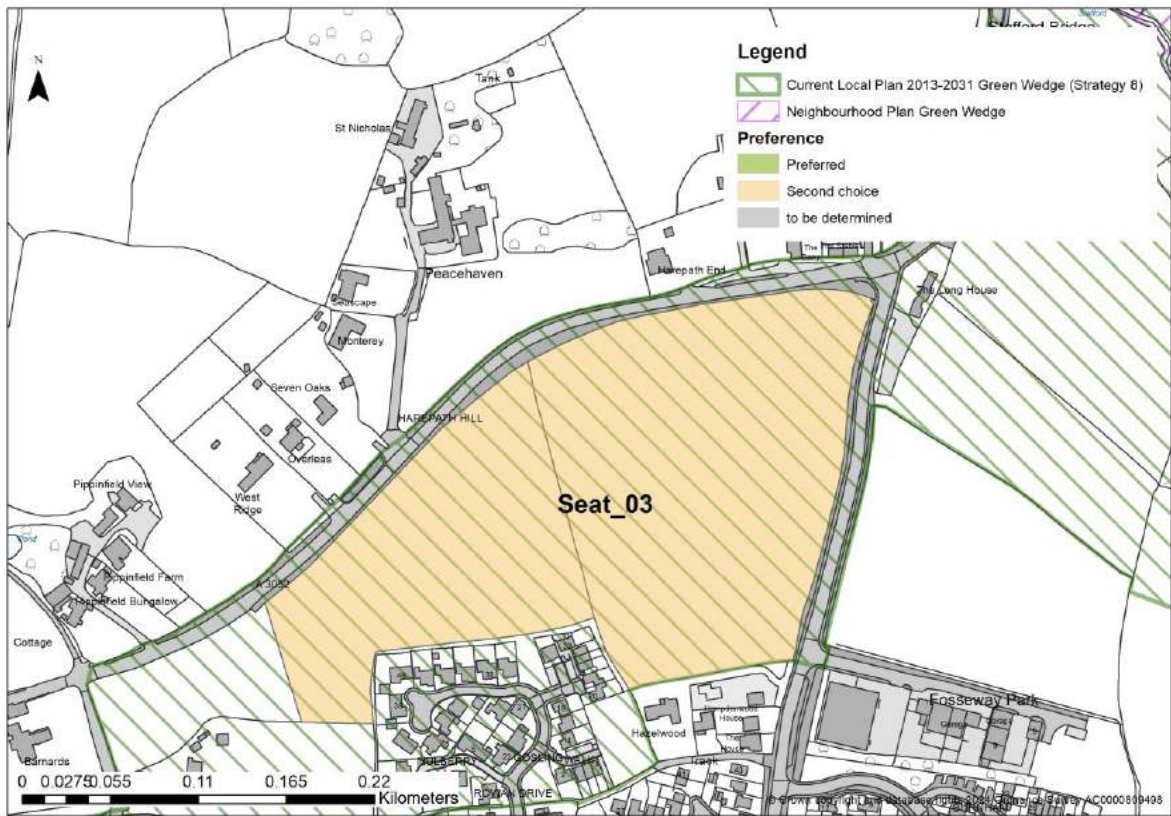


Figure 10: Land between Seaton and Colyford –
Seat_03 (Second Choice allocation) 70 dwellings

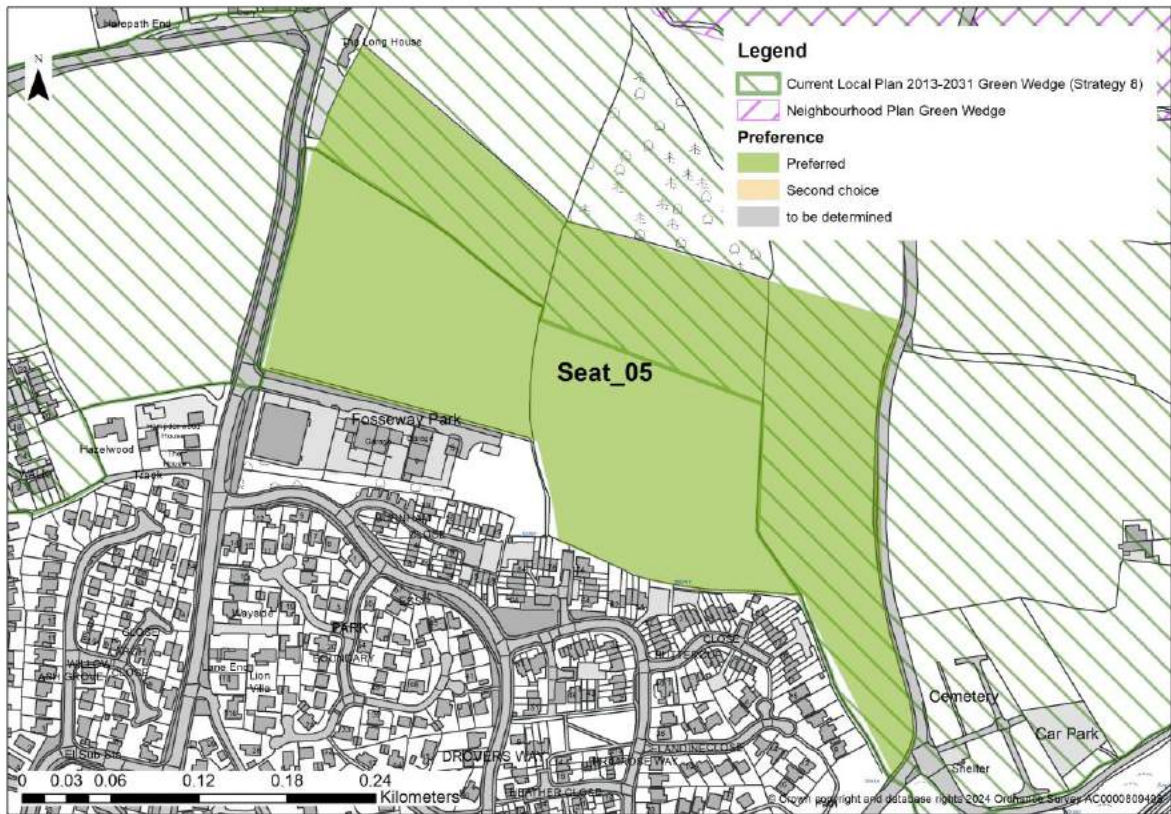


Figure 11: Land between Seaton and Colyford – Seat_05 (Preferred allocation) 100 dwellings and 2.2 hectares of employment land
n.b. Only part of proposed site is within the green wedge



Figure 12: Land between Seaton and Colyford – Seat_13a (Preferred allocation) 39 dwellings

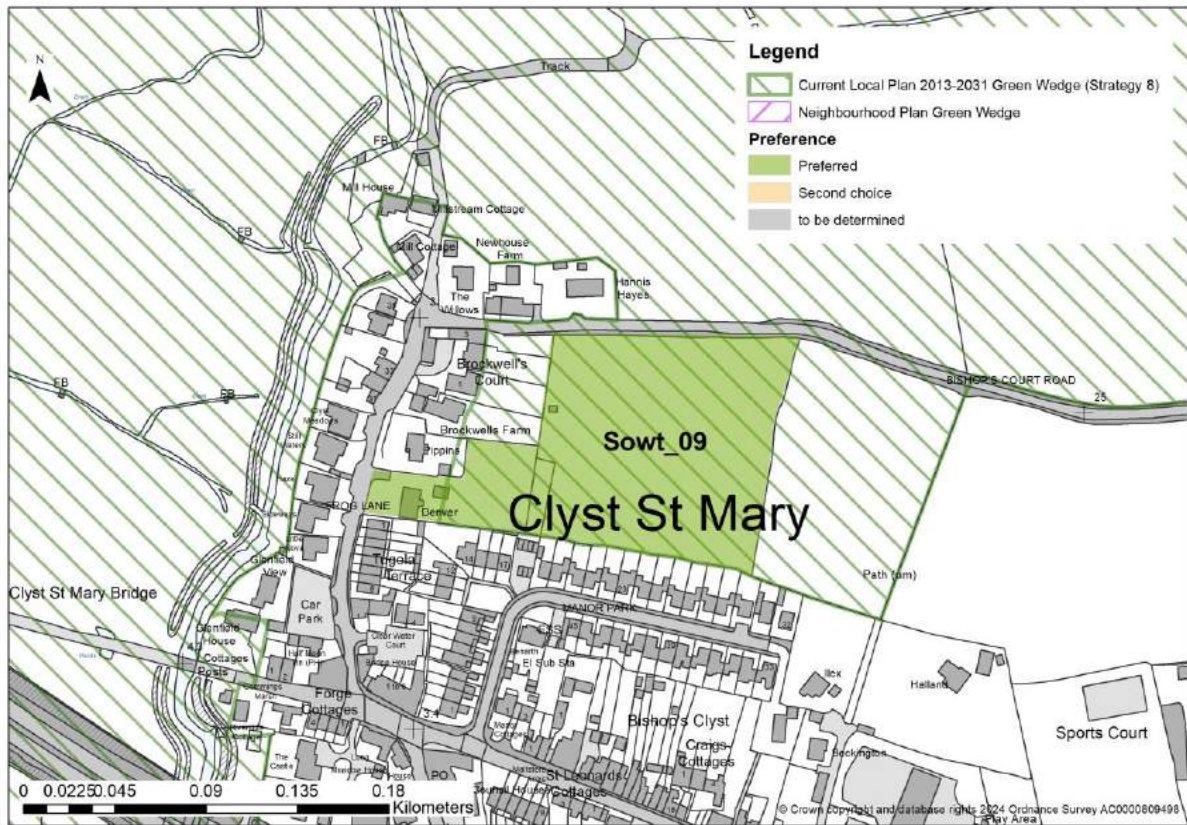


Figure 13: Land east of Exeter – Sowt_09 (Preferred allocation) 35 dwellings and 0.14 hectares of employment land n.b. Small part of proposed site outside the green wedge

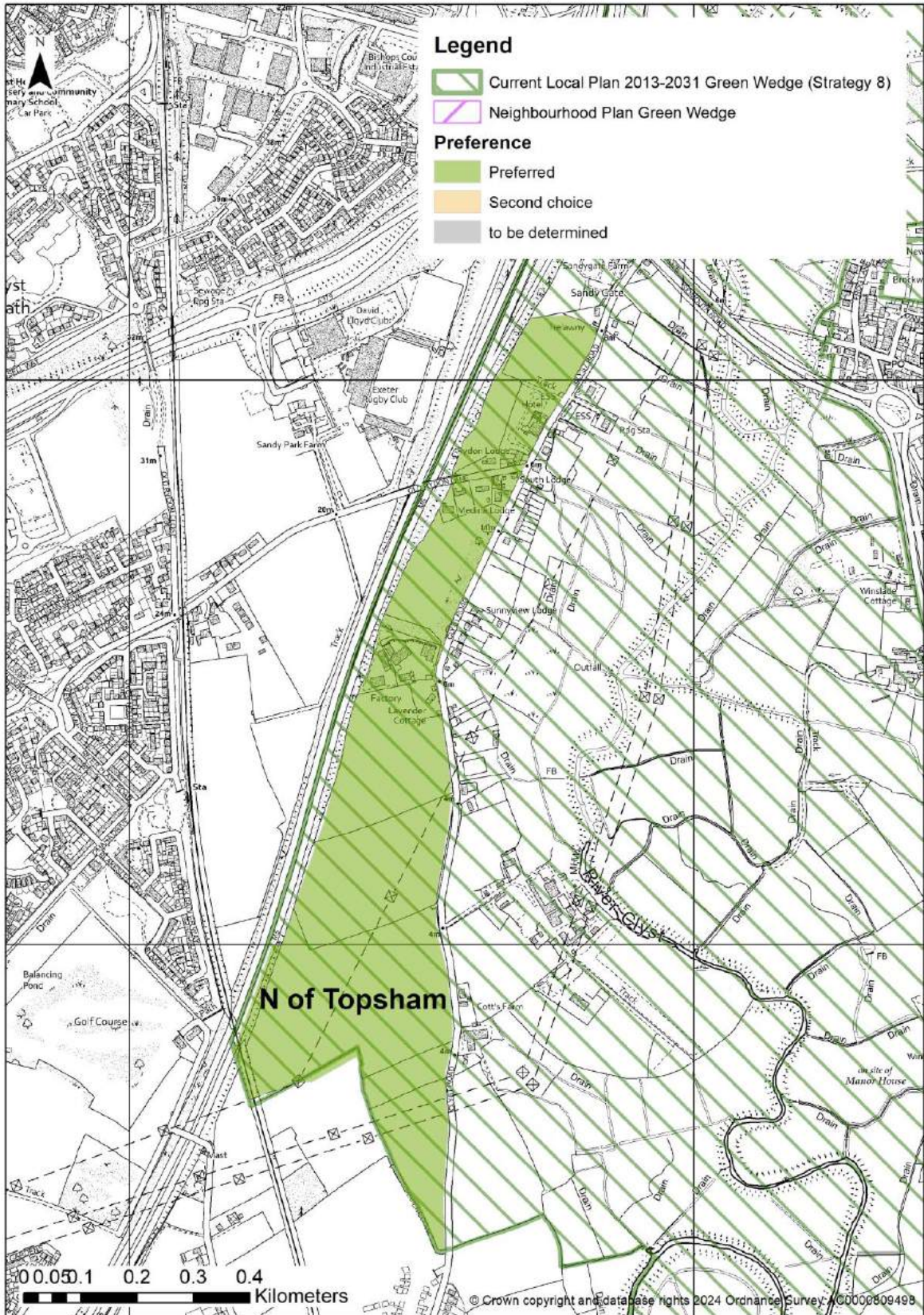


Figure 14: Land east of Exeter – Land North of Topsham (Preferred allocation) 580 dwellings and at least 2.4 hectares of employment land

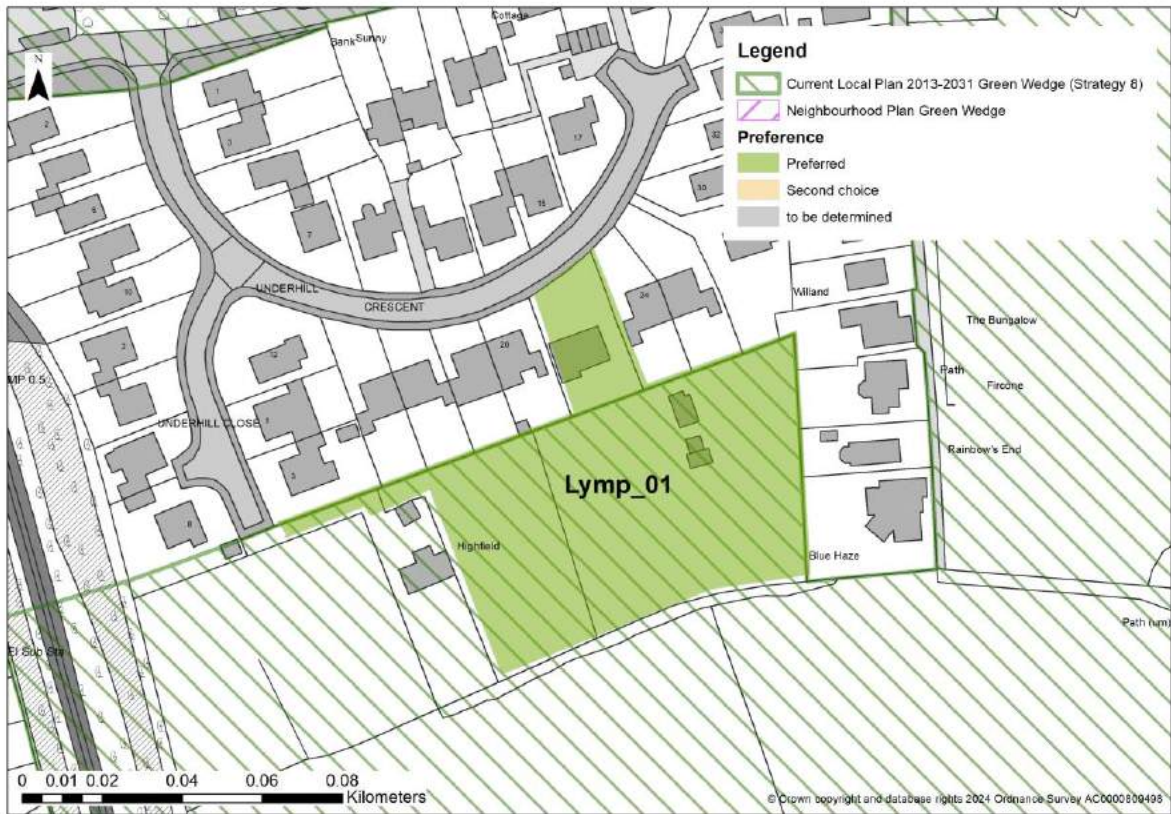


Figure 15: Land between Exmouth and Lympstone – Lymp_01 (Preferred allocation) 14 dwellings
n.b. Small part of proposed site outside the green wedge

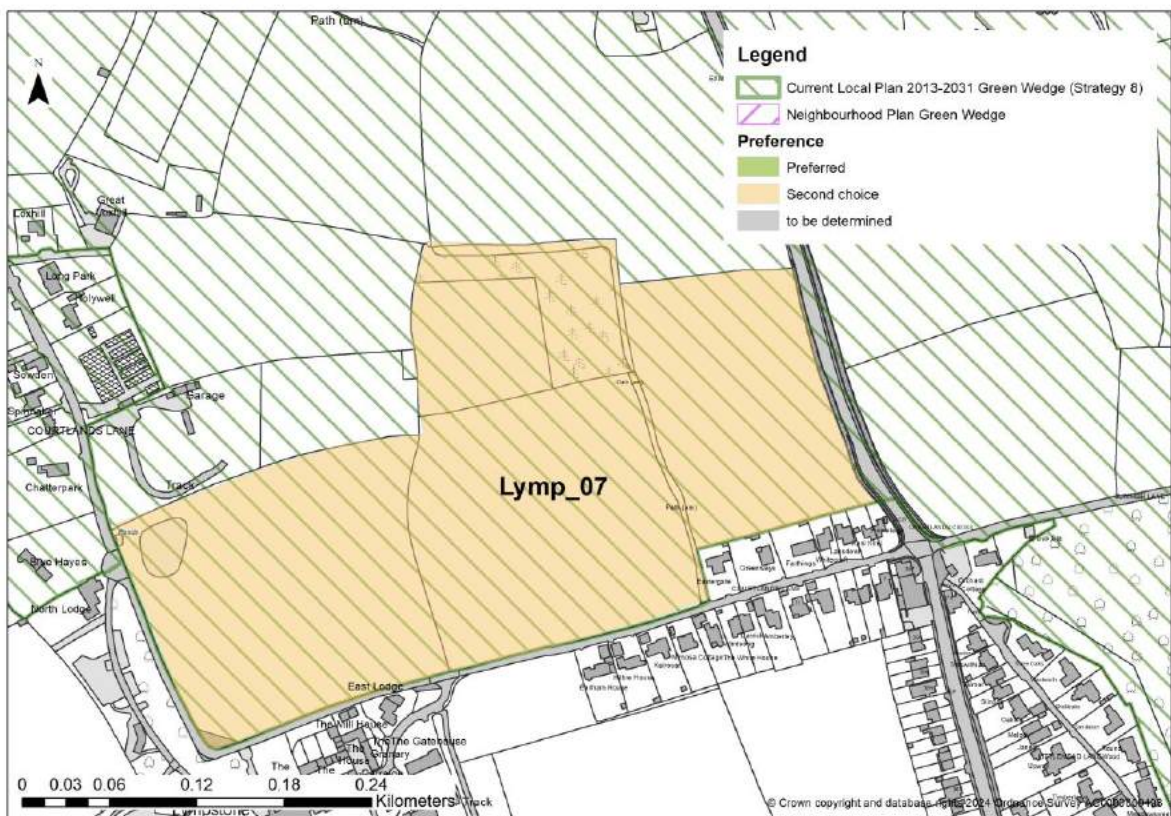


Figure 16: Land between Exmouth and Lympstone – Lymp_07 (Second Choice allocation) 100 dwellings and 0.4 hectares of employment land

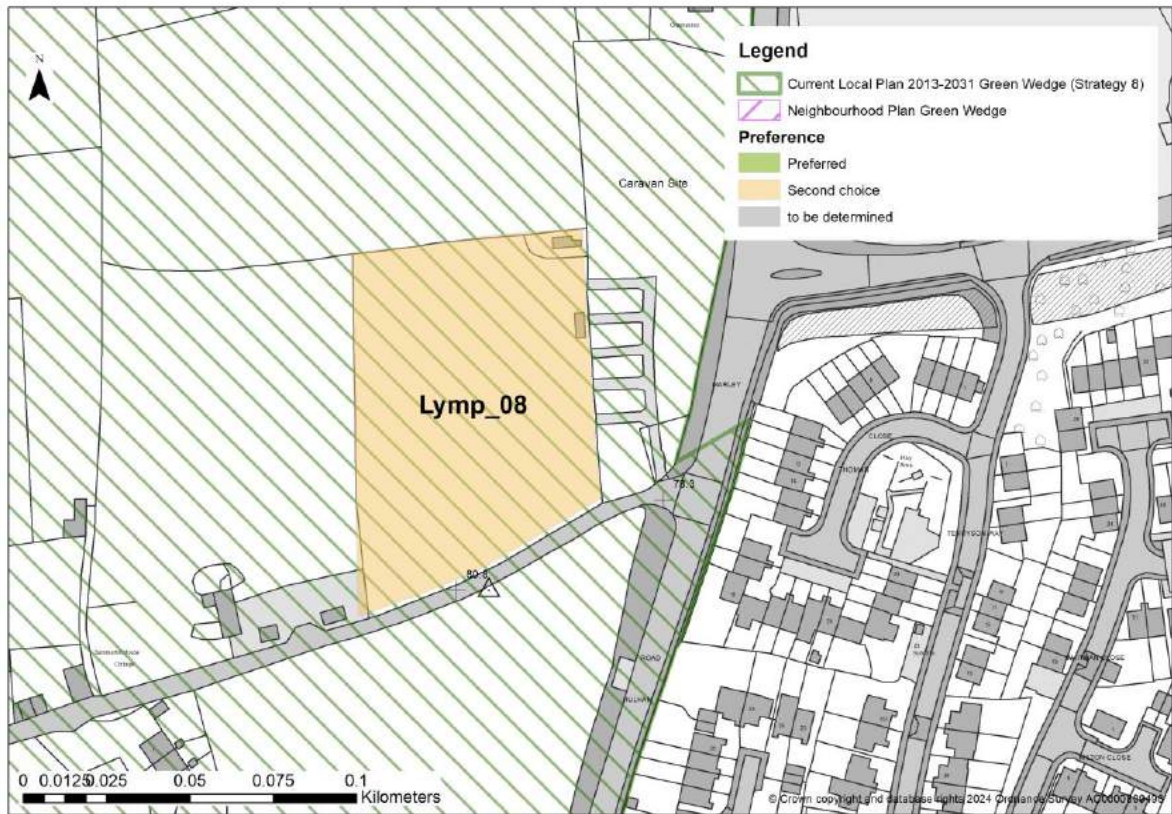


Figure 17: Land between Exmouth and Lymington – Lymp_08 (Second Choice allocation) 14 dwellings

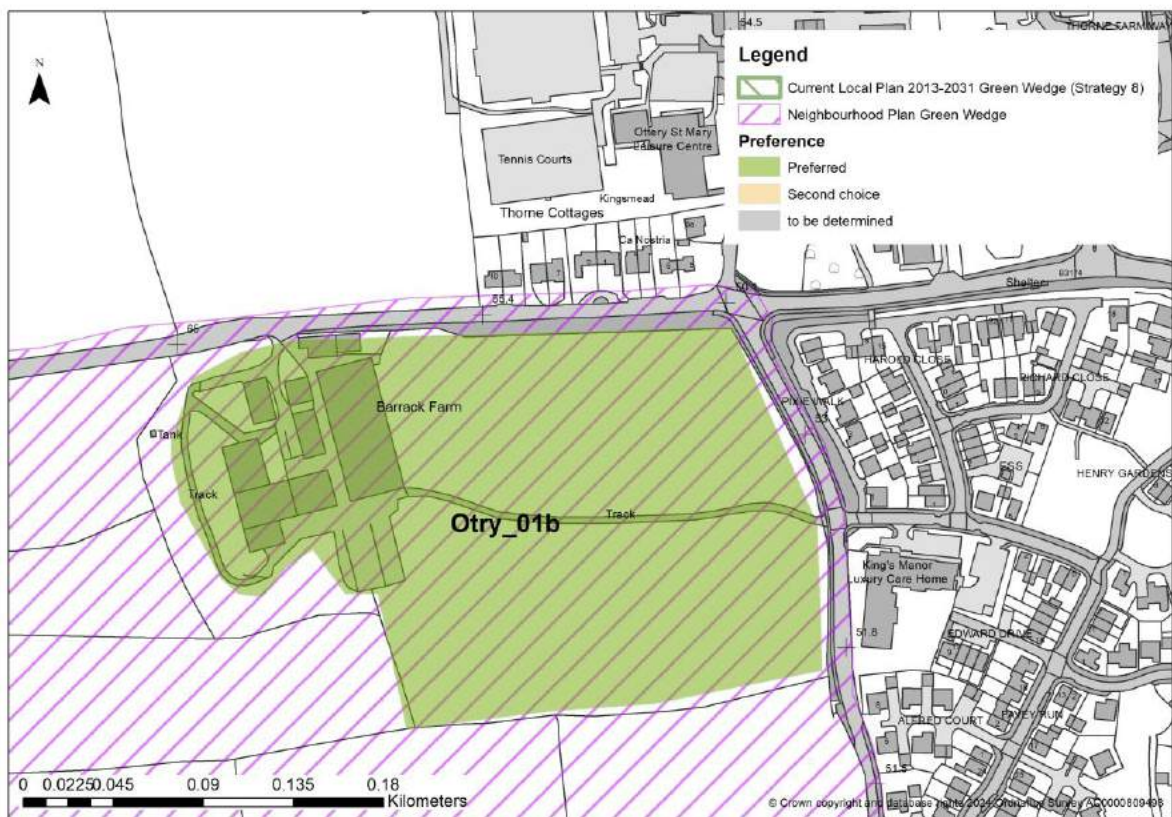


Figure 18: Land between Ottery St Mary and West Hill – Otry_01b (Preferred allocation) 70 dwellings and 1.25 hectares of employment land

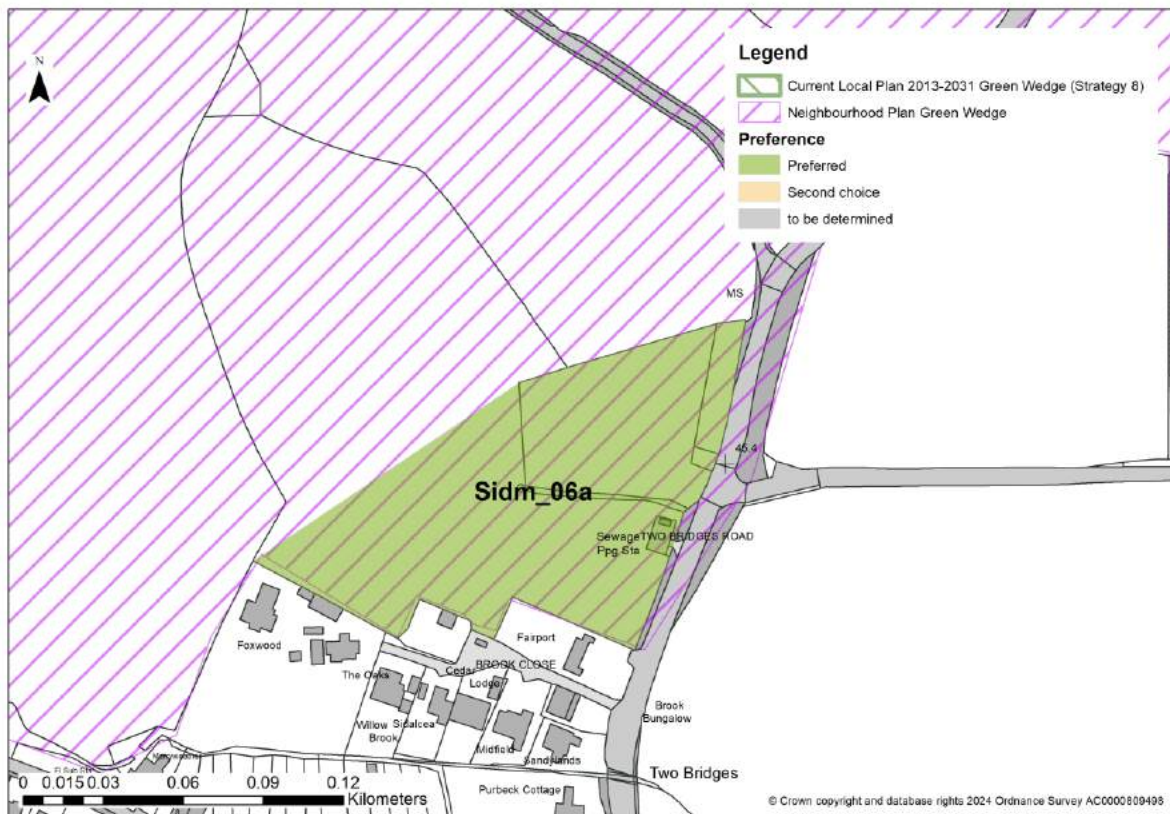


Figure 19: Land between Sidbury and Sidford – Sidm_06a (Preferred allocation) 30 dwellings

6. Consultation

- 6.1 It is proposed that public consultation on various local plan designations and allocations, including Green Wedges, will be undertaken as soon as possible after receiving committee approval. Such consultation will last for a minimum of 6 weeks.
- 6.2 The suggested consultation material is set out in Appendix 1 to this report. This approach is very much led by discussions with Members at the recent workshop and reflects the current green wedges as set out in the adopted Local Plan and Neighbourhood Plans aside from the minor changes referred to above.

Financial Implications:

There are no direct financial implication resulting from the report.

Legal Implications:

There are no legal implications requiring comment.

Appendix 1 – Proposed consultation material for Green Wedges (dependent of Committee endorsing the Option B approach set out in the committee report)

East Devon Local Plan 2020 to 2040

Preferred Options Reg. 18 Further Consultation Draft Plan

Spring 2024

We consulted on a draft local plan from November 2022 to January 2023 that referred to Green Wedges. We suggested possible policy and indicated potential proposed boundary lines on maps. We are now consulting further on revised proposed:

- Policy Wording, and
- Green Wedge Boundaries

In considering these we would encourage you to look at the previous consultation and to consider Green Wedge policy and boundaries in the context of the full draft local plan [commonplace-reg-18-final-071122.pdf \(eastdevon.gov.uk\)](https://www.eastdevon.gov.uk/media/125122/commonplace-reg-18-final-071122.pdf).

The idea behind Green Wedges is that they identify areas between settlements (typically towns and villages) that help define and establish the individual character and separation of those settlements. The concern is that if these 'gaps' start to be filled-in with built development, or more starkly are completely filled-in with development, it could result in nearby (but separate) settlements progressively or completely merging into a single built-up mass and losing their separate identities.

We have drawn Green Wedges to typically align with the built-up edges of settlements, the point where the urban and built form of development transitions in to countryside and rural areas. Noting that most of the countryside is in rural land uses, particularly farming. Though in defining Green Wedges (and specifically boundaries) we recognise that there is not always a very clear, obvious and stark dividing line between urban and rural and as such there can be some judgement calls on boundary definition.

The division between urban and rural helps establish a point at which **intrinsic settlement separation** can be seen to start to occur. This is the point at which it may be understood or perceived that you are leaving one settlement, entering the countryside, then travelling through that countryside or open space, before entering a new and different settlement. The Green Wedge boundaries are drawn to fill the most obvious and direct gaps between settlements, typically the closest parts. They are, however, also drawn to wrap around some edges of settlements (especially town edges) in recognition that coalescence could ultimately occur through the creeping of development, or one-off big developments, that occur around outer Green Wedge edges, rather than just through their centre or core.

We have drafted policy wording for the Green Wedges, as set out below. **We welcome your views as to whether the policy wording is appropriate:**

Policy xx – Green Wedges

Green Wedges are defined on the Policies Map and are identified as areas between settlements where constraints on development are essential to prevent physical or visual coalescence and/or maintaining the character and identity of those settlements or a sense of intrinsic separation.

Development will not be permitted in defined areas if that development would create in its own right or add to existing sporadic or isolated development or damage the individual identity of a settlement or could lead to, encourage or start to lead to actual or potential for settlement coalescence.

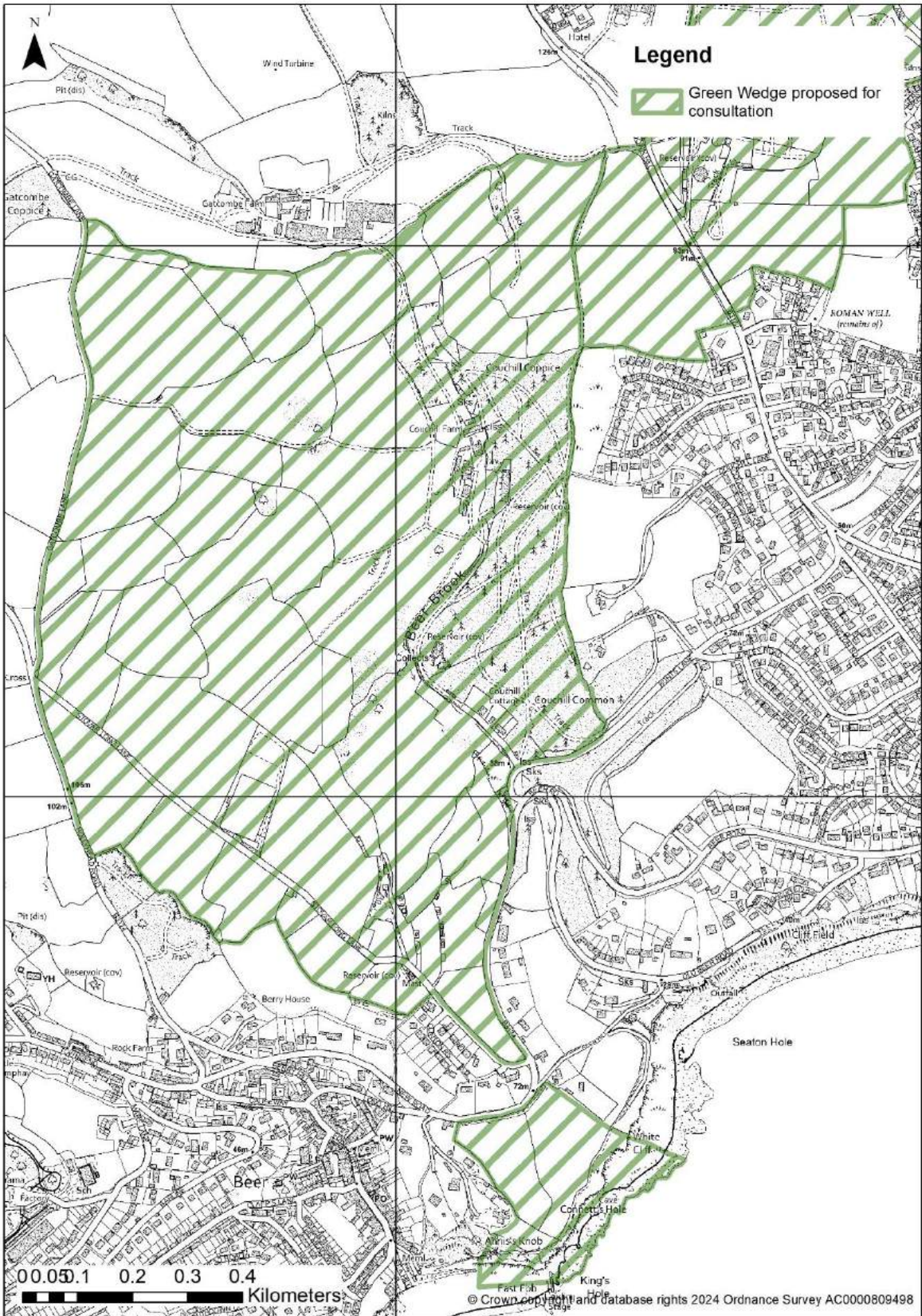
The maps that follow show the areas of land that are proposed to be designated as Green Wedges. These are areas that are identified as important in terms of separating settlements that are close together. It is considered that inappropriate (non-policy compliant) development in these areas would lead to the settlements either merging, moving in this direction or there being a perception of moving towards merging together and thus losing their distinctive separate identities. There is therefore a restrictive policy approach, as reinforced by other restrictive policies in the local plan, in respect of what may be built in these areas.

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

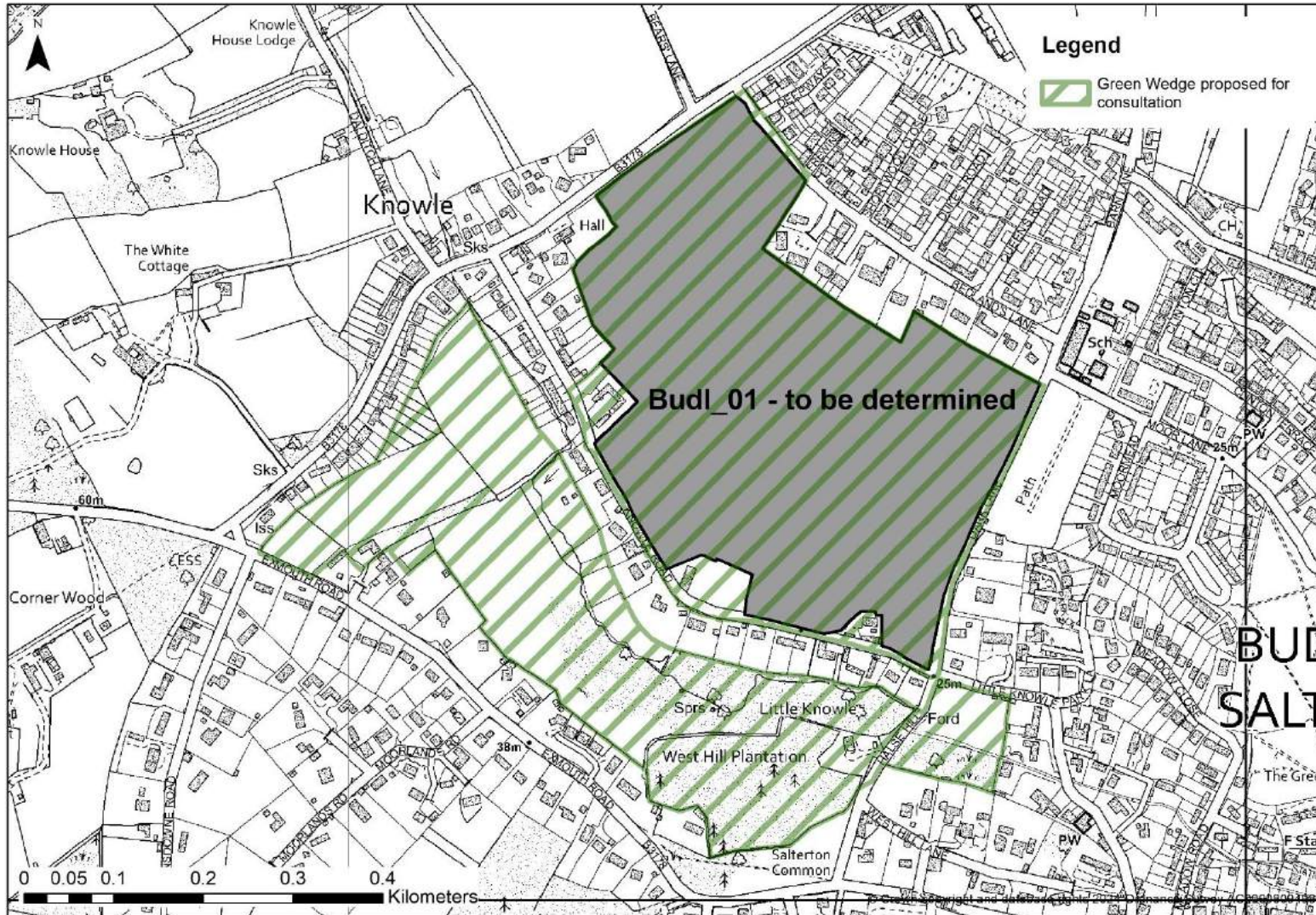
The main purpose of the Green Wedges is to protect the undeveloped land between settlements to stop them merging and to protect their separate characters. However, a green wedge designation is not designed to prevent all development from taking place and some may still be necessary to meet local housing and employment needs. There are some potential development sites (as set out in the consultation draft local plan) on the edges of settlements but within the Green Wedges. These sites have been assessed as potentially being appropriate as they would not in themselves lead to settlement coalescence or threaten the individual identity of settlements, however if these sites are built on this could change the undeveloped character of the area.

Do you think that sites proposed for new housing or employment development should be included in the Green Wedges (would the development be appropriate inside a Green Wedge?) or should the Green Wedges be redrawn to exclude them?

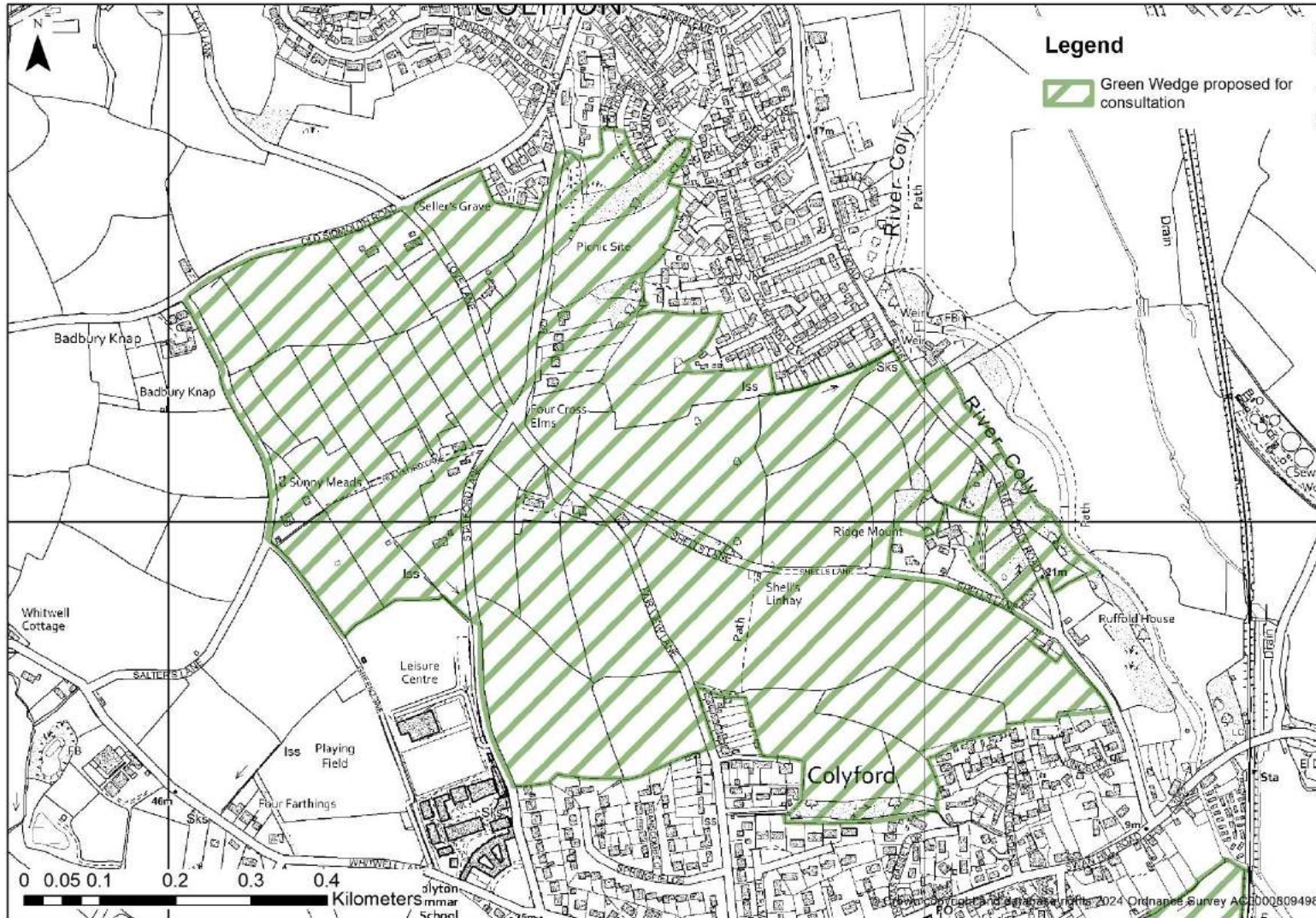
We would also welcome your views on whether the actual policy wording for Green Wedges is appropriate?



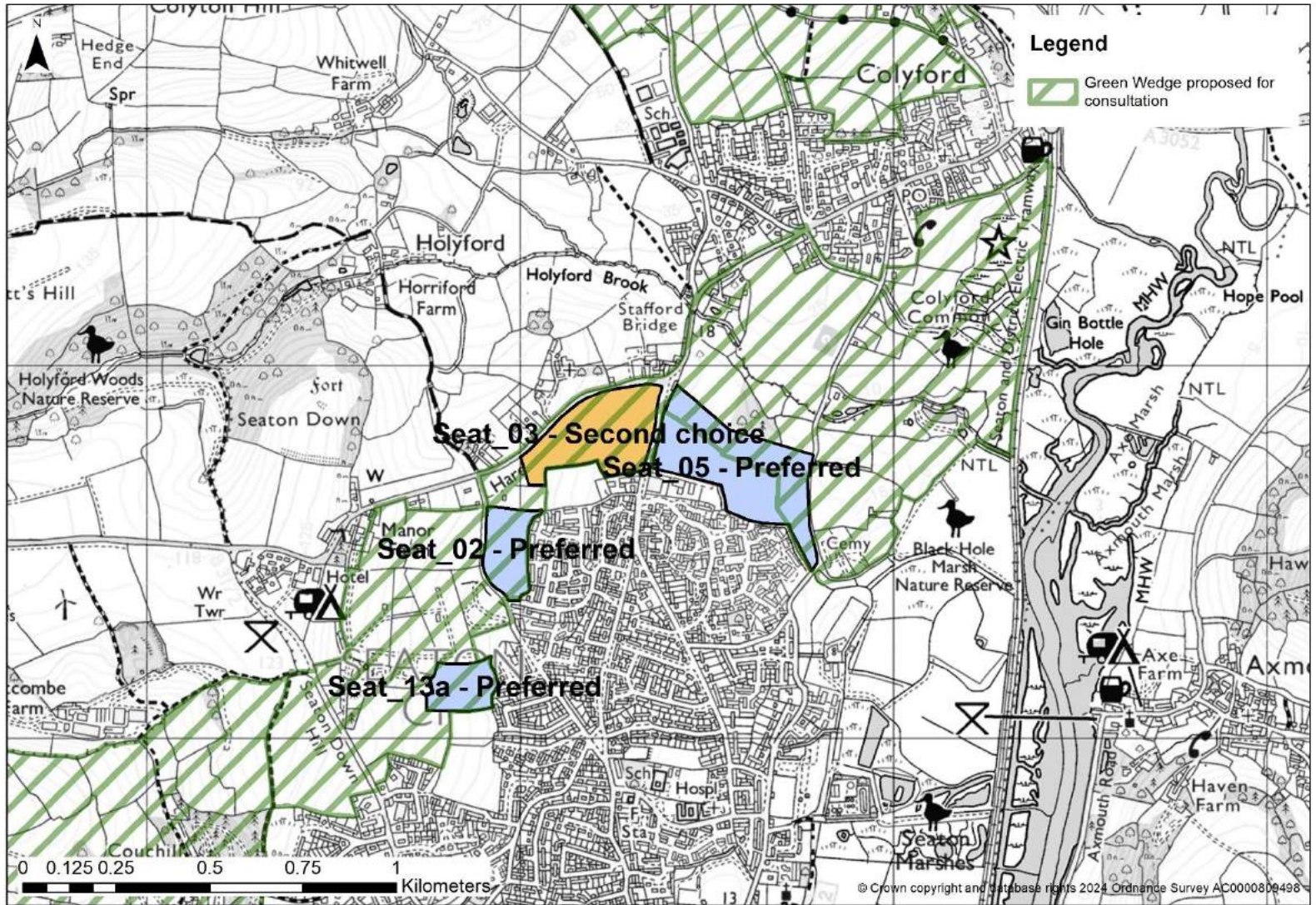
Land between Beer and Seaton



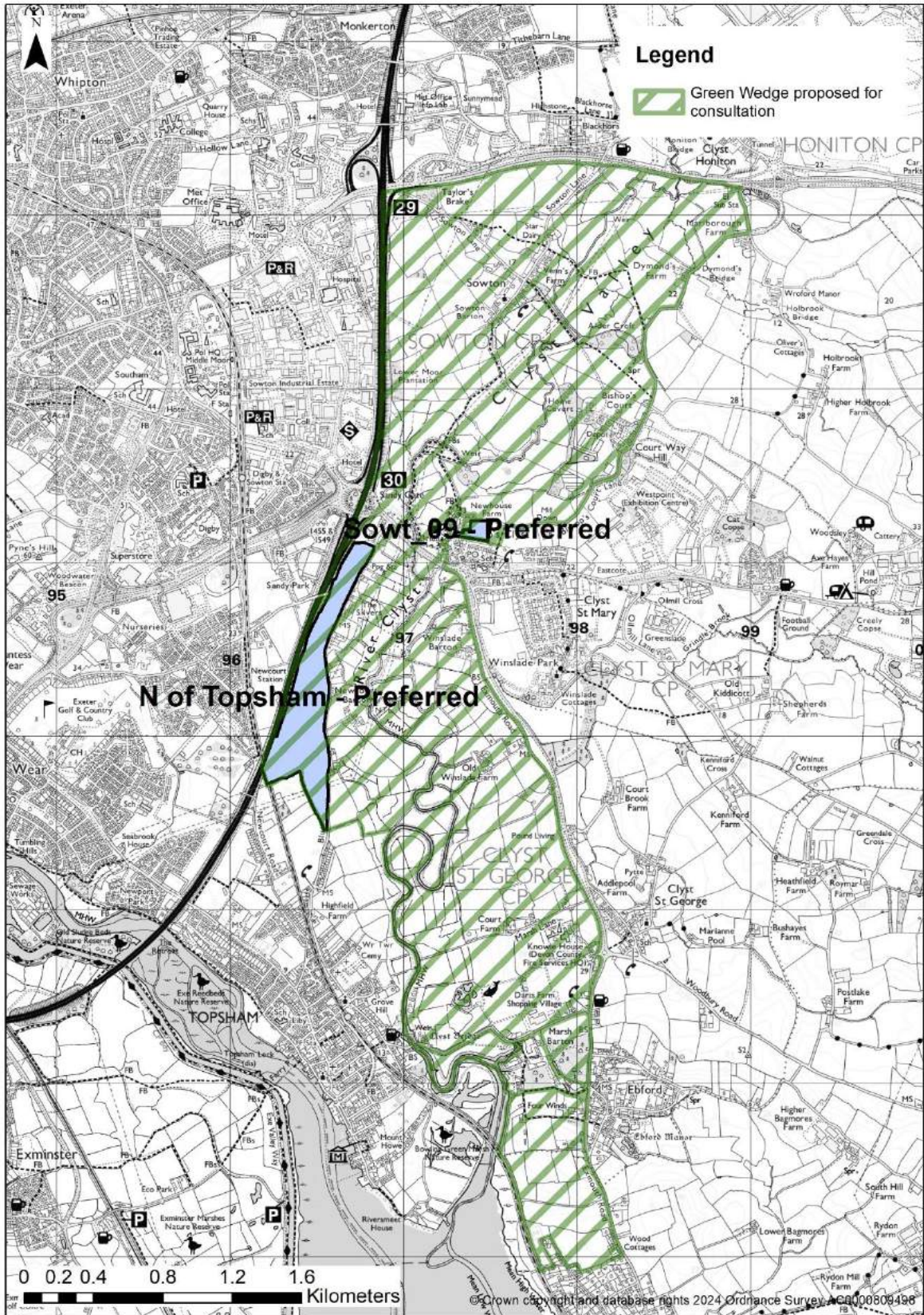
Land between Budleigh Salterton and Knowle



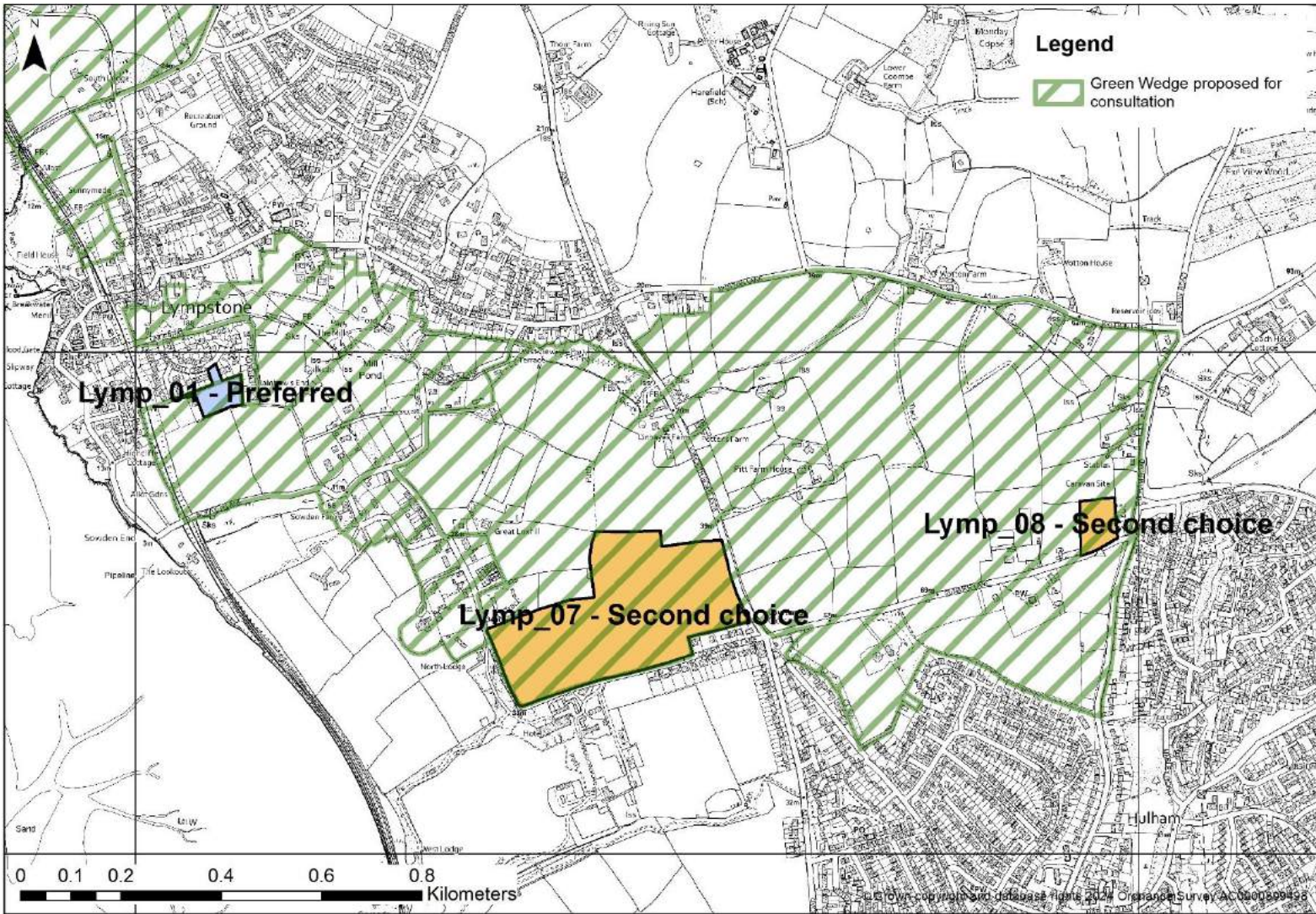
Land between Colyton and Colyford



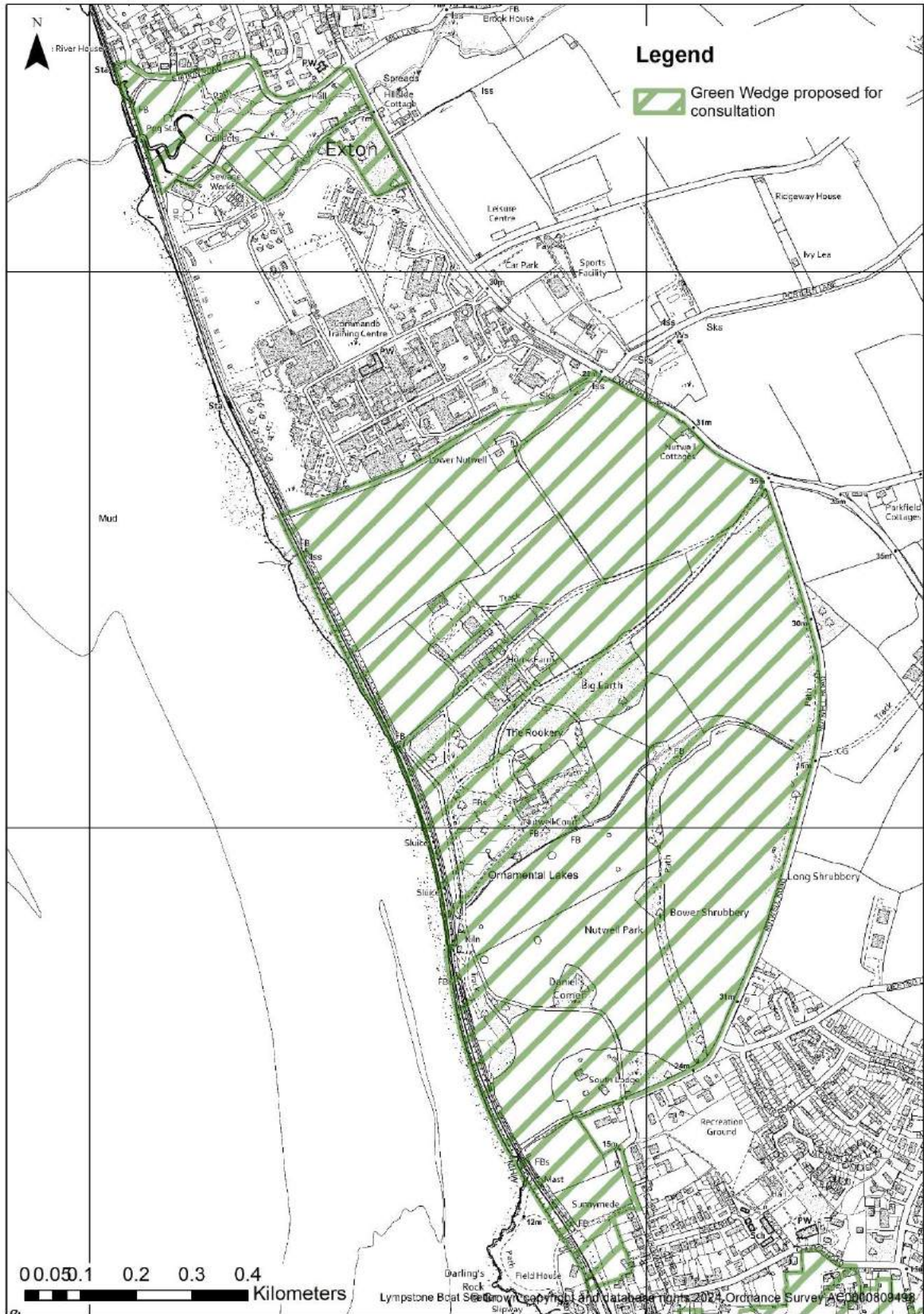
Land between Seaton and Colyford



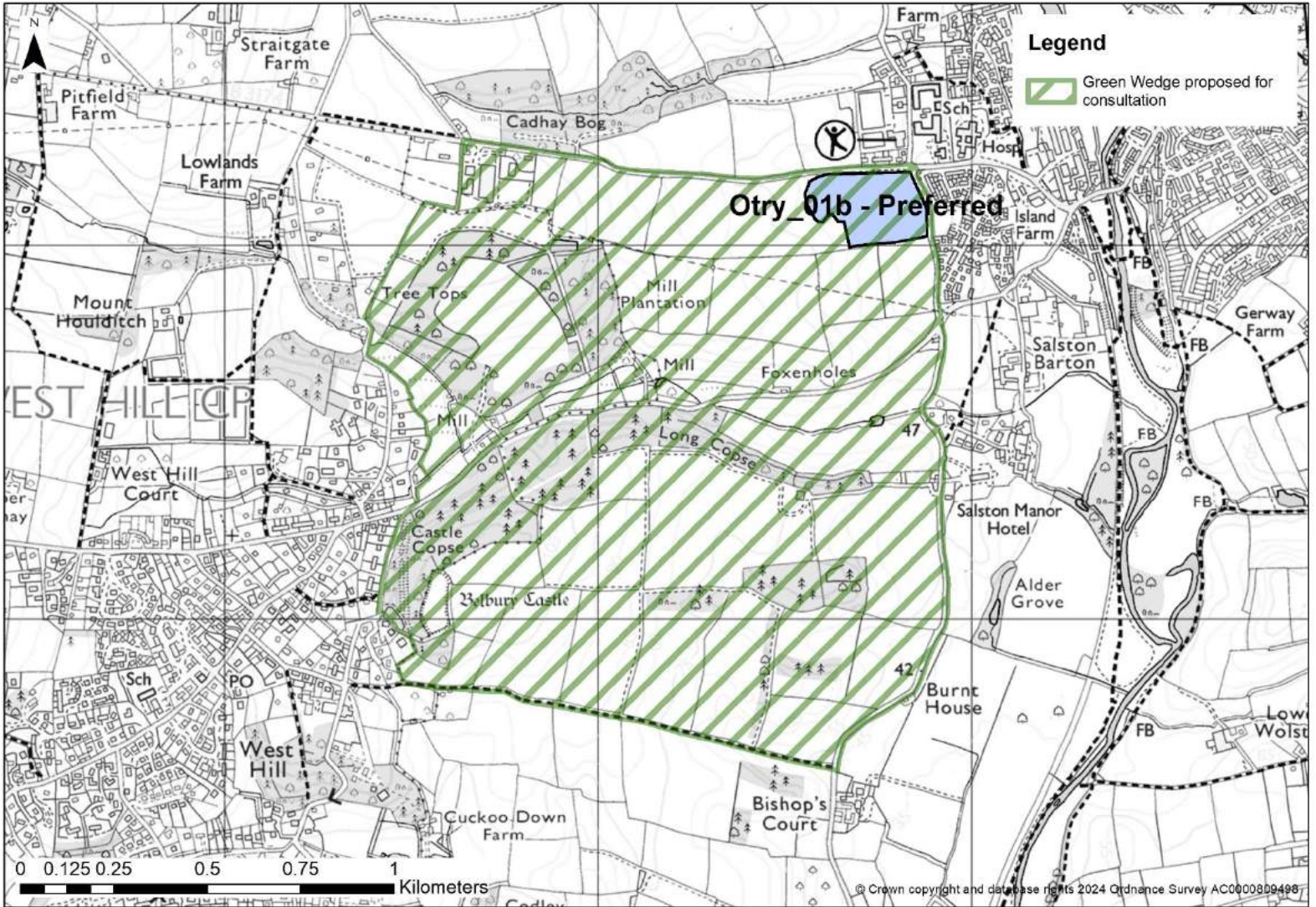
Land east of Exeter



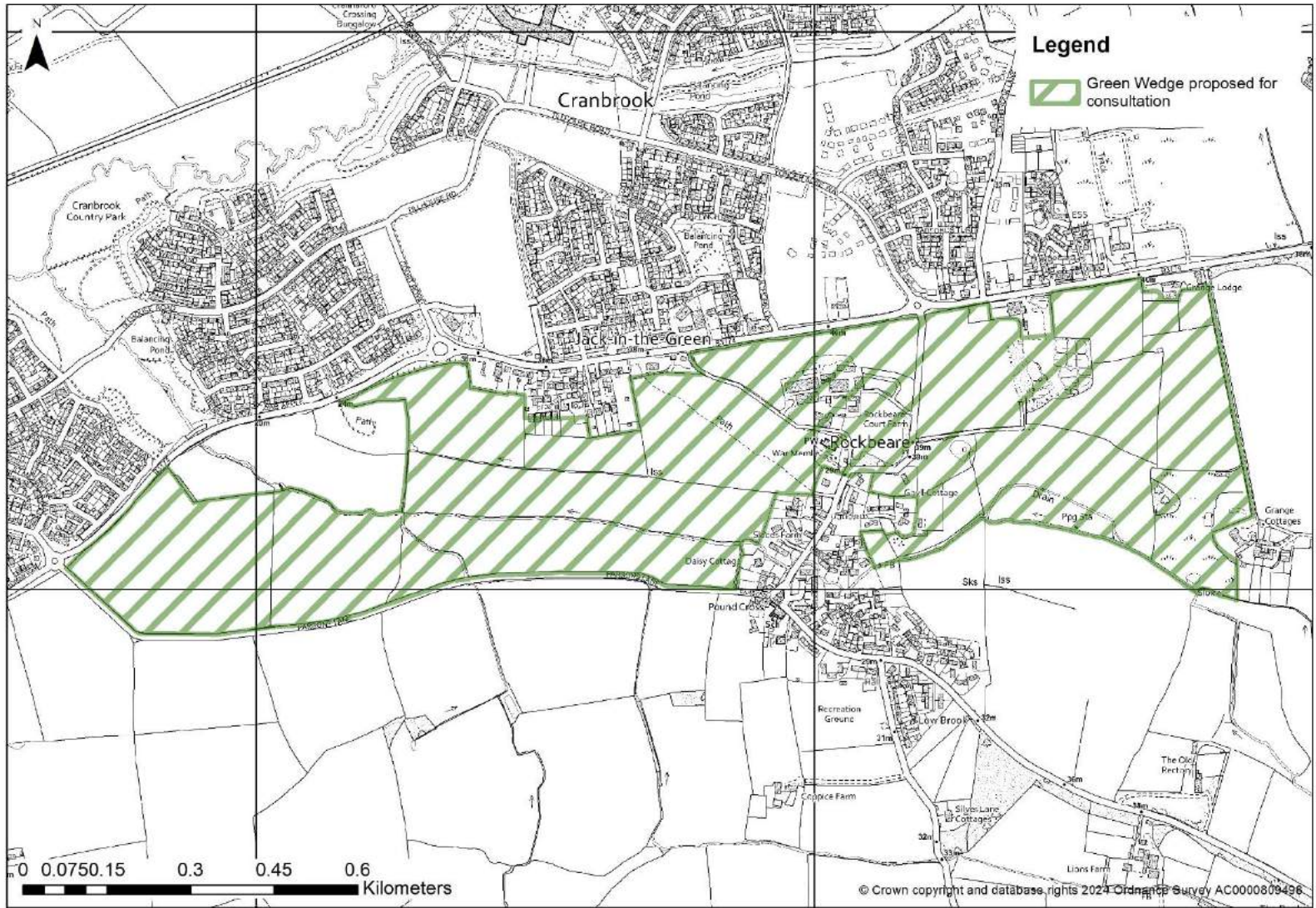
Land between Exmouth and Lymington



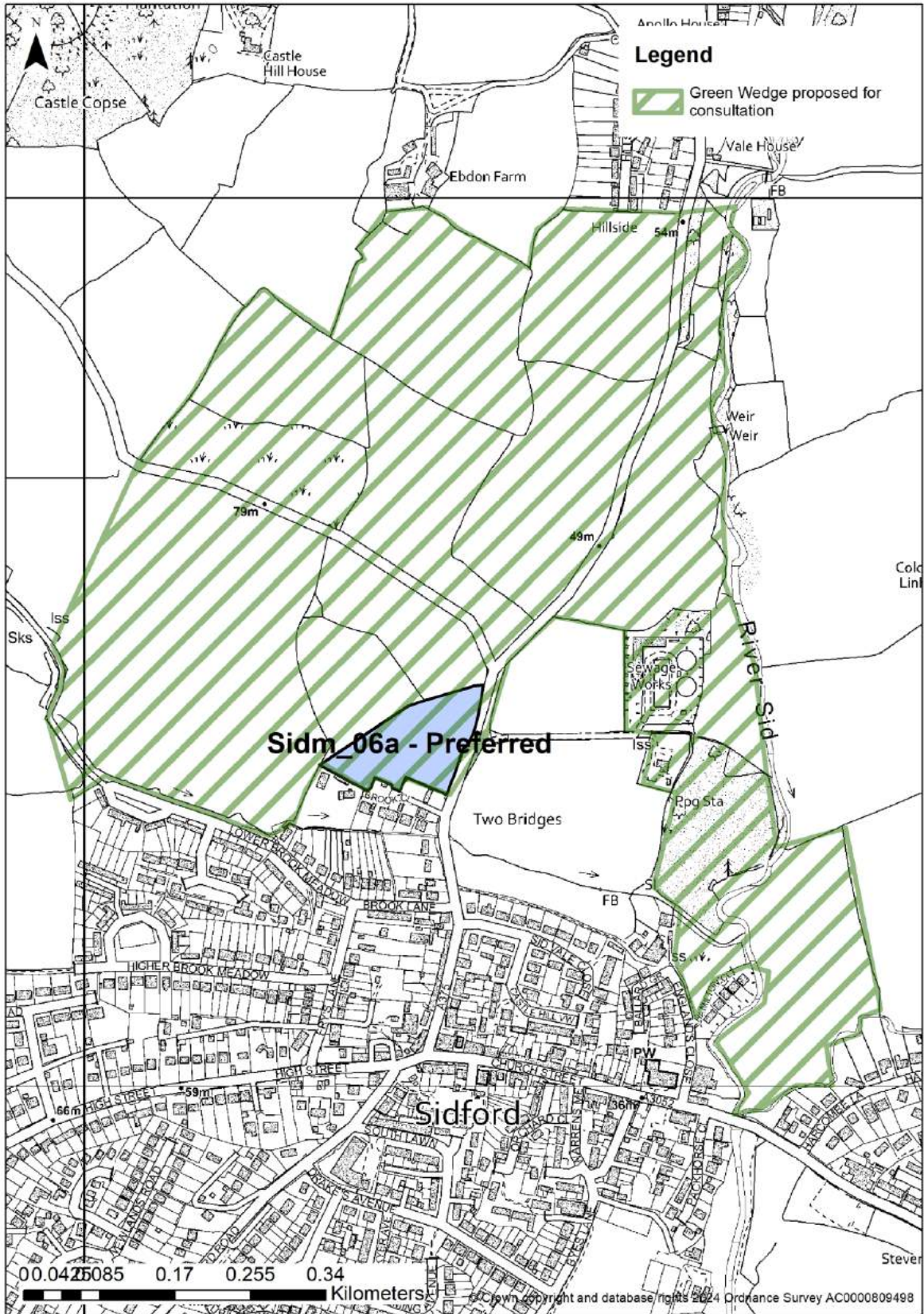
Land between Lympstone Commando and Exton / Lympstone and Lympstone Commando



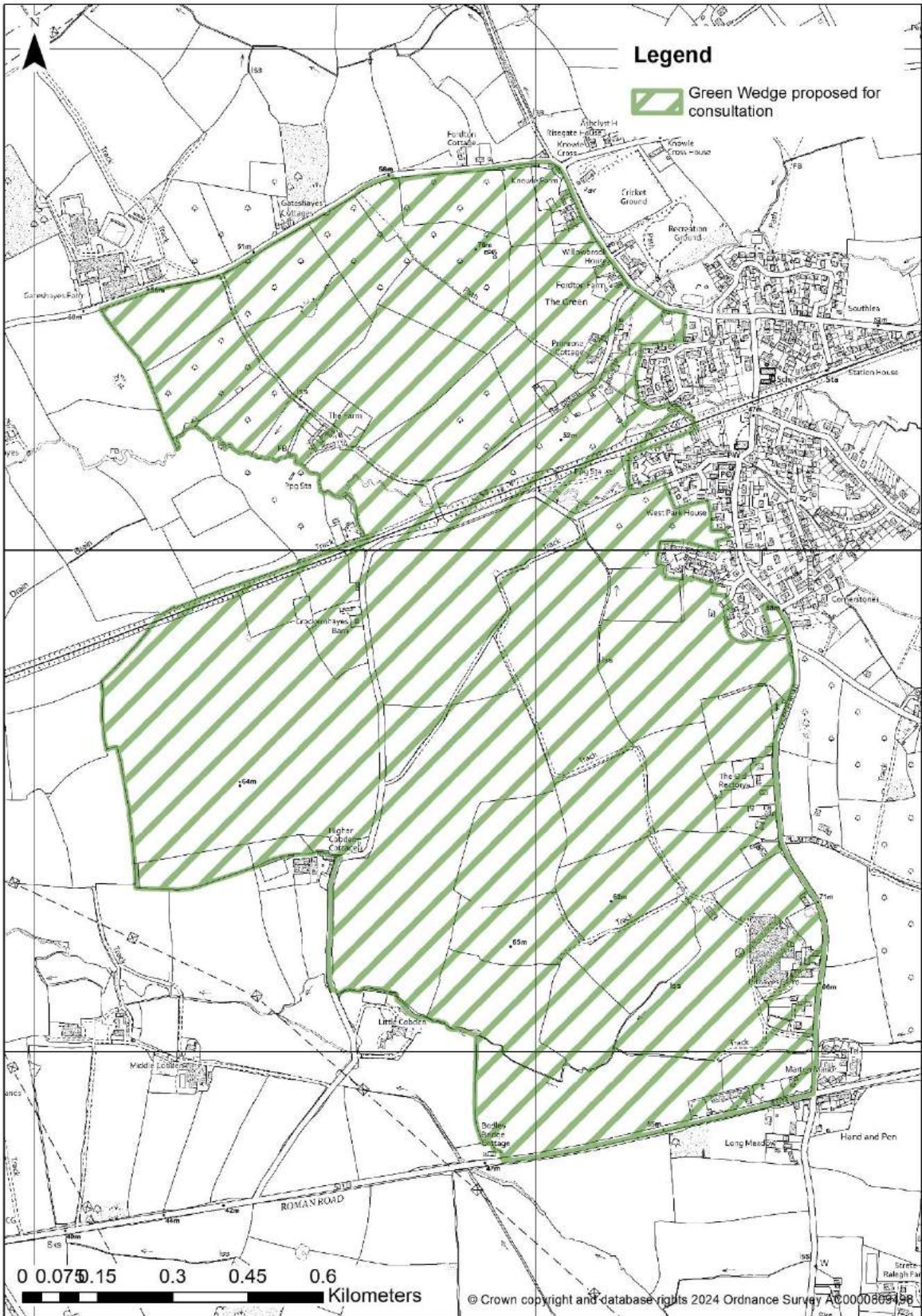
Land between Ottery St Mary and West Hill



Land between Rockbeare and Cranbrook



Land between Sidbury and Sidford



Land between Whimble and Cranbrook