

Report to: Strategic Planning Committee



Date of Meeting Tuesday 3 September 2024

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

Housing requirement and Site allocations – Exmouth and surrounding areas

Report summary:

This report sets out recommendations for sites to be allocated for development through the new local plan for/at the settlements of – Exmouth, Lypstone, Woodbury, Exton, Budleigh Salterton, Otterton and East Budleigh. Subject to Committee approval, and any further assessment undertaken, the sites will be included as allocations for development in the Regulation 19 draft of the local plan that is proposed to be considered at Strategic Planning Committee in November 2024.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

That Strategic Planning Committee agree to include the recommended site allocations set out in this report, for Exmouth and surrounding areas, for inclusion in the Regulation 19 draft of the plan scheduled to be considered by this Committee in November 2024.

Reason for recommendation:

To ensure that appropriate land, in Exmouth and surrounding areas, is allocated in the new local plan to provide for development needs, specifically for housing.

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Portfolio(s) (check which apply):

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

Equalities impact Low Impact

Climate change Low Impact

Risk: High Risk; To be found sound at Examination, and therefore to be in position where it can be adopted, the local plan will need to provide for sufficient and appropriate housing growth to meet levels set out by Government. This requires the allocation of land for development. Should decisions be taken to **not** allocate appropriate and sufficient land the expectation is that the local plan will not be in a position where it can be adopted. Amongst other impacts this is likely to lessen or remove controls and influence that this council will have on the type, nature and location of development, notably housing, that may be built in the future, with speculative planning applications, for example, being far more likely. In the absence of a plan we would need to anticipate far more planning appeals with the costs and other impacts that arise from these. There are powers, should a planning authority not produce a local plan, for Government intervention and imposition of a third party to produce a local plan on behalf of the authority.

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

Link to [Council Plan](#)

Priorities (check which apply)

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

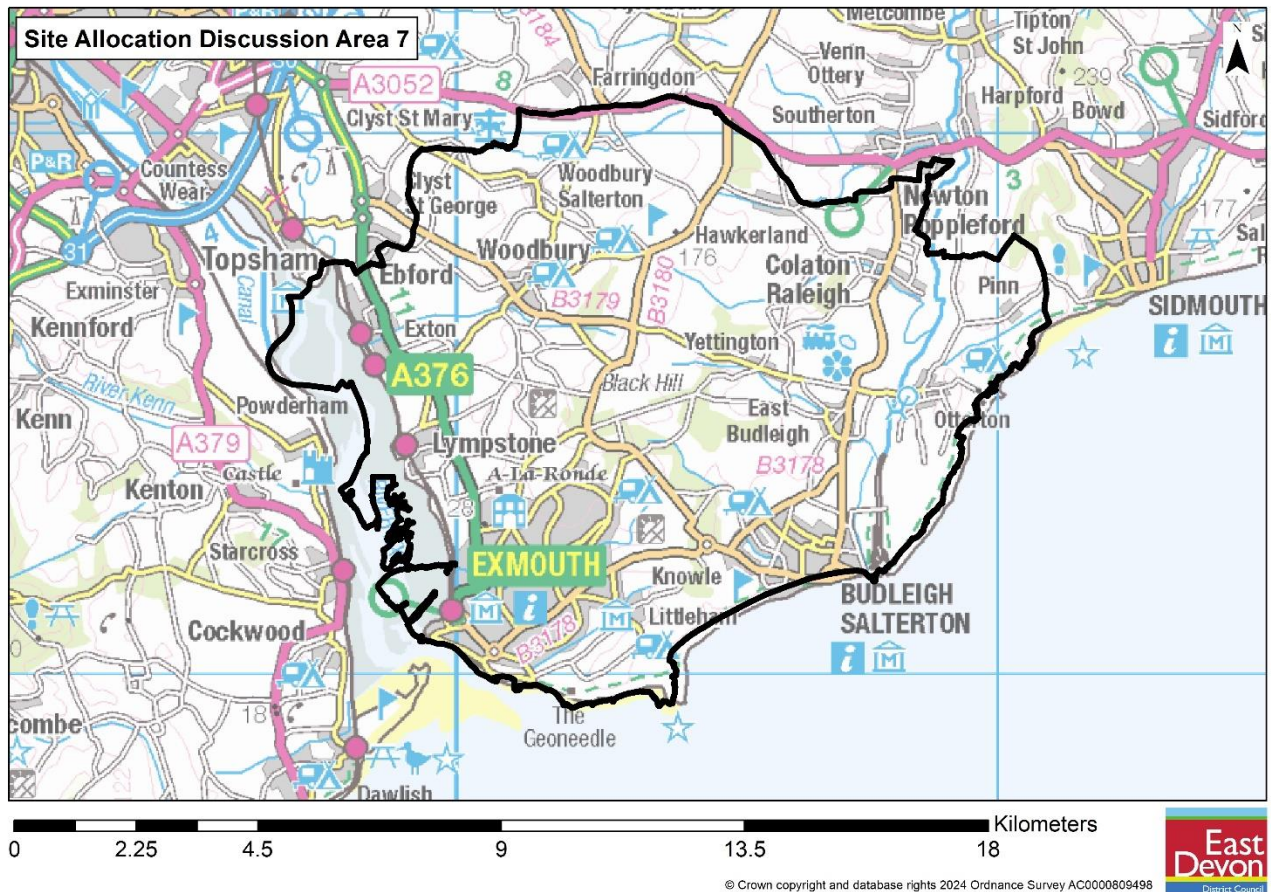
Report in full

1. Introduction

1.1 This report is specifically concerned with proposed sites for allocations for development at and around settlements close to Exmouth – these specifically are:

- Exmouth,
- Lympstone,
- Woodbury,
- Exton,
- Budleigh Salterton,
- Otterton and
- East Budleigh
- Woodbury Salterton – Greendale employment site

The area covered is shown on the map extract below, denoted by reference number 7.



1.2 It should be noted that we are only proposing to allocate sites for development that fall in/at/next to settlements in the draft local plan settlement hierarchy (see [commonplace-reg-18-final-071122.pdf](https://www.eastdevon.gov.uk/commonplace-reg-18-final-071122.pdf) ([eastdevon.gov.uk](https://www.eastdevon.gov.uk)) – Strategic Policy 1). Therefore, other smaller settlements, hamlets and rural areas that fall within the overall black line area above are not included in this report and are not identified as locations for allocation of land for development.

2. Technical assessment of sites and working party considerations

- 2.1 To support site selection work officers have produced technical assessments of site options and choices. The assessment reports for sites that are referenced in this committee report can be viewed in the appendices. These technical reports are amended redrafts of reports that went to Member Working party meetings held in July and August 2024 to reflect discussions held at those meeting and points raised. In addition, there are some amendments to correct matters of accuracy and update on relevant new information.
- 2.2 The technical reports contain summary information only and behind them there is more detailed assessment work in respect of landscape, built heritage and biodiversity considerations. Full reports, with all details (again as might be refined and adjusted in the light of new information), will accompany the local plan when presented to Strategic Planning Committee in November 2024.
- 2.3 The notes taken from the working party meeting for Exmouth and surrounding areas can be viewed at: Appendix i.

3. Summary of key site allocation recommendations by location

3.1 In this section we set out some headline commentary around recommended site allocation choices at the settlements addressed in this report. This is intended to provide an overview of some key considerations. In the next section of this report we list, on a settlement by settlement basis, and in Ward boundary order, all of the sites that have been promoted for development in various calls for sites and that were not sifted out on account of being deemed not developable or not being in accordance with the settlement hierarchy -see [1a. Role and Function of Settlements_report_v3_final draft for SPC.pdf \(eastdevon.gov.uk\)](#).

Exmouth and development options at and around the town

- 3.2 Exmouth is the largest town in East Devon, is the only Principal Centre in the settlement hierarchy, and amongst other matters has a very significant affordable housing need. Compared to its physical size, and population, there were however comparatively few sites being promoted for development (though absolute site numbers were high). The town has significant environmental constraints in respect of outward development potential and these are compounded by estuary and coastal waters abutting western and southern sides of the town.
- 3.3 Exmouth benefits from a significant levels of infrastructure and facilities though it is recognised that pressures and demands for services are great with pressure on schools, including the very large secondary school in the town. Sewage capacity constraints were particularly noted in feedback received.
- 3.4 The sites recommended for allocation at Exmouth are assessed as being credible and realistic site allocation options to provide for reasonable and appropriate growth at the town. This is specifically so given the strategic importance of the town as a major centre in East Devon, being very well supplied with services and facilities and with an underlying need for development, including affordable housing.
- 3.5 Notwithstanding good strategic grounds for higher levels of development it is recognised that constraints do exist and that there are sensitivities associated with development of a number of the recommended site allocations at and around the town.
- 3.6 We would specifically highlight that at the working party meeting the development of recommended site allocations on the northern side of the town (some falling in Lypstone Parish) came in for particular challenge. Land at and north of Courtland Lane, specifically site Lypm_12, was highlighted as a very unpopular choice for development as were a cluster of sites, proposed for a combined area allocation for about 260 houses, around Higher Marley Road and Hulham Road. A view of attendees present at the working party was that a large area of land on the western side of Exmouth, Site referenced as Exmo_20a in site assessment work and this report, would be a better option for allocation for development. A more detailed summary of consultation responses at Reg 18 stage which are relevant to the sites considered under this item is available Appendix j.
- 3.7 Site Exmo_20A was promoted for development through a past 'call for sites' but was not previously recommended as an allocation for development on account, in part, of sensitivities for parts of the site. Concerns included heritage matters associated with St

John in the Wilderness and also proximity to the Pebblebeds and the East Devon National Landscape. Though it is appreciated that these types of constraints and considerations are not unique to this Exmouth site option. Whilst initial submissions had promoted larger scale development at this location there was a lack of clear evidence of active and ongoing promotion of a large-scale strategic development at this site.

- 3.8 In response to working party considerations officers have, however, contacted and met with interested parties/developer interests associated with possible larger scale development in this location (noting the potential it offers to accommodate several hundred new homes). It should be noted that site Exmo_20b (which is part of what was the original Exmo-20 submission, i.e. it included the now sub-divided a) and b) components) is recommended as an allocation for 150 new homes.
- 3.9 An Officer concern was that without evidence of active promotion by landowners for development we would not be in a sound position to rely on delivery of this site in our overall housing totals. As such, from an officer perspective, we would not have been in a position to recommend formal allocation, though the plan could reference the potential that this land offers in respect of possible future housing supply. Such referencing could note the constraints that do apply to the site and we would also highlight potential challenges around securing vehicular access to the site. There is scope to accommodate road access, from the south up to certain levels of development, but for strategic scale growth (i.e. an option for several hundred houses) the primary road access may need to be from the B3179 on the northern site boundary. We would see this as a technically viable option from a highway perspective but it is more challenging in respect of objectives around promoting shorter car journeys and fewer vehicles on the roads. It may lead to the site being accessed from outside of the town by cars and other non-public transport vehicles with some road access and very importantly cycle and pedestrian routes and public transport into the town from the south of the site. There is, therefore, a possible danger that development would be somewhat detached from the town as a consequence, although this may equally help to promote walking and cycling and also through high quality design and development there may be scope to overcome such concerns.
- 3.10 We would regard it as appropriate to continue engagement in respect of this site, with interested parties promoting development of the land and we would inform committee in the future on updates. In summary this larger area could therefore potentially be a realistic site option for development.

Lympstone and development options at and around the village

- 3.11 Lympstone falls in the third tier, Local Centre classification, of the settlement hierarchy, as such in draft plan policy it is seen as appropriate to meet local needs and those in the immediate surroundings. There were a range of sites promoted for development at and around the village with a modest number proposed as allocations. It should be noted that some sites in Lympstone parish fall adjacent to the town of Exmouth and in recommendations for allocation for development they are considered in the context of relevance of development of the town of Exmouth (rather than Lympstone village).
- 3.12 Lympstone benefits from a railway station and a good range of services and facilities (for a settlement of its size). It is noted, however that there are flooding concerns at the village and with narrow village streets there can be some congestion problems.

Woodbury and development options at and around the village

- 3.13 Woodbury falls in the third tier, Local Centre classification, of the settlement hierarchy, as such and in draft plan policy it is seen as appropriate to meet local needs and those in the immediate surroundings. There were a considerable number of sites promoted for development at the village with a number recommended for allocation. It is noted that at the working party meeting there was particular opposition to development of Site Wood_10 primarily on highway access grounds, however there is no objection in principle from the highway authority. It is worth noting that there is a planning application for 60 dwellings pending a decision on this site (23/2166/MOUT). DCC Highways comments on this application state "...the proposed access provides a visibility splay which accords to our current best practice guidance..." DCC also note a proposed off-site footway project will improve pedestrian access over Gilbrook Bridge. Wood_09 was seen as a more favourable option by some. Though it was noted that Wood_09 would be unable to accommodate the number of houses that Wood_10 would.
- 3.14 Woodbury has a range of facilities and services commensurate with a village of its size. Main roads, however, bisect the village with safety concerns and speeding vehicle highlighted as a particular concern. Sewage capacity constraints are also a major concern at the village.

Budleigh Salterton and development options at and around the town

- 3.15 Budleigh Salterton falls in the third tier, Local Centre classification, of the settlement hierarchy, as such and in draft plan policy, it is seen as appropriate to meet local needs and those in the immediate surroundings. The East Devon National Landscape sweeps over all of the town and this forms a significant constraint to development. However, notwithstanding this consideration there are recommended site allocations, albeit these would provide for quite modest levels of development in comparison with the existing size and population of the town.
- 3.16 Budleigh Salterton has a reasonable range of facilities and services though proximity to Exmouth, and the facilities it offers, places some reliance on the nearby much bigger town. Sewage capacity constraints were a major concern that was highlighted.

East Budleigh, Otterton, Exton and development options at and around these villages

- 3.17 These villages all fall in the fourth tier of the settlement hierarchy, they are classified as Service Villages and draft plan policy provides for limited development to meet local needs. These villages have limited recommended land allocations for development.
- 3.18 These villages offer a some facilities and services to meet basic day-to-day needs.

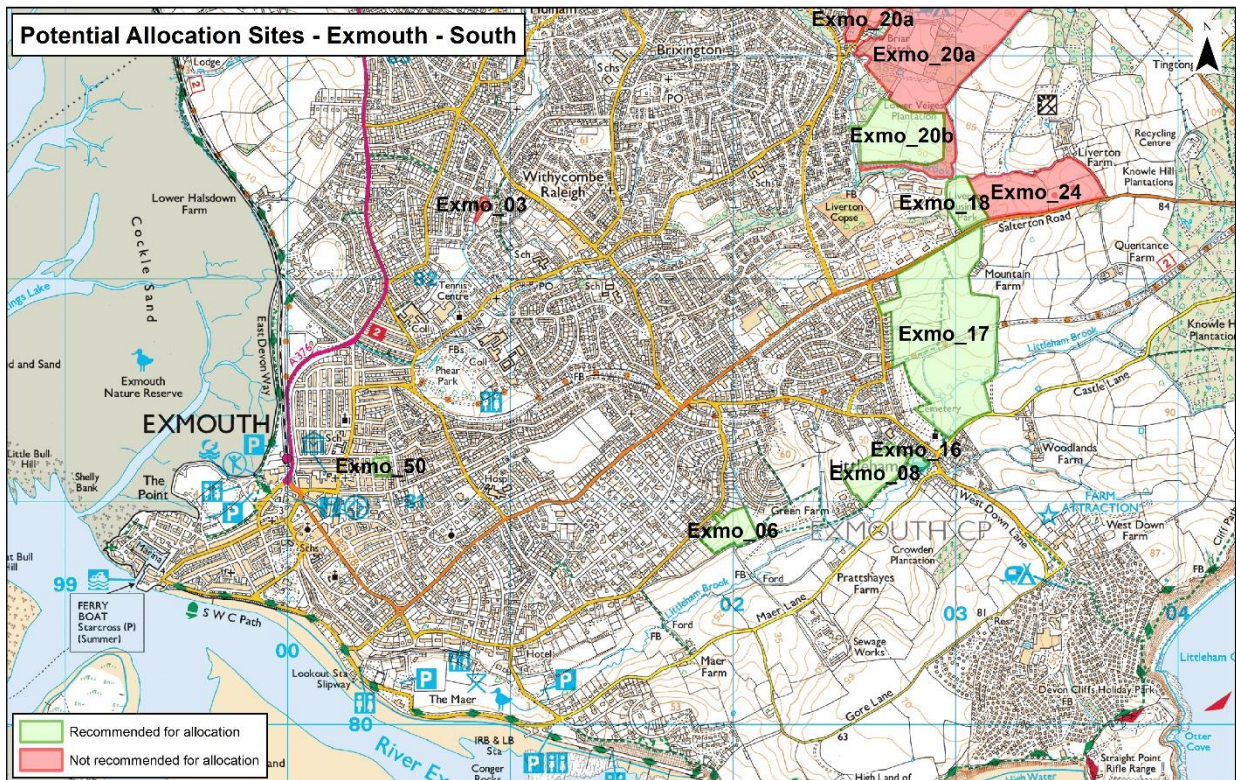
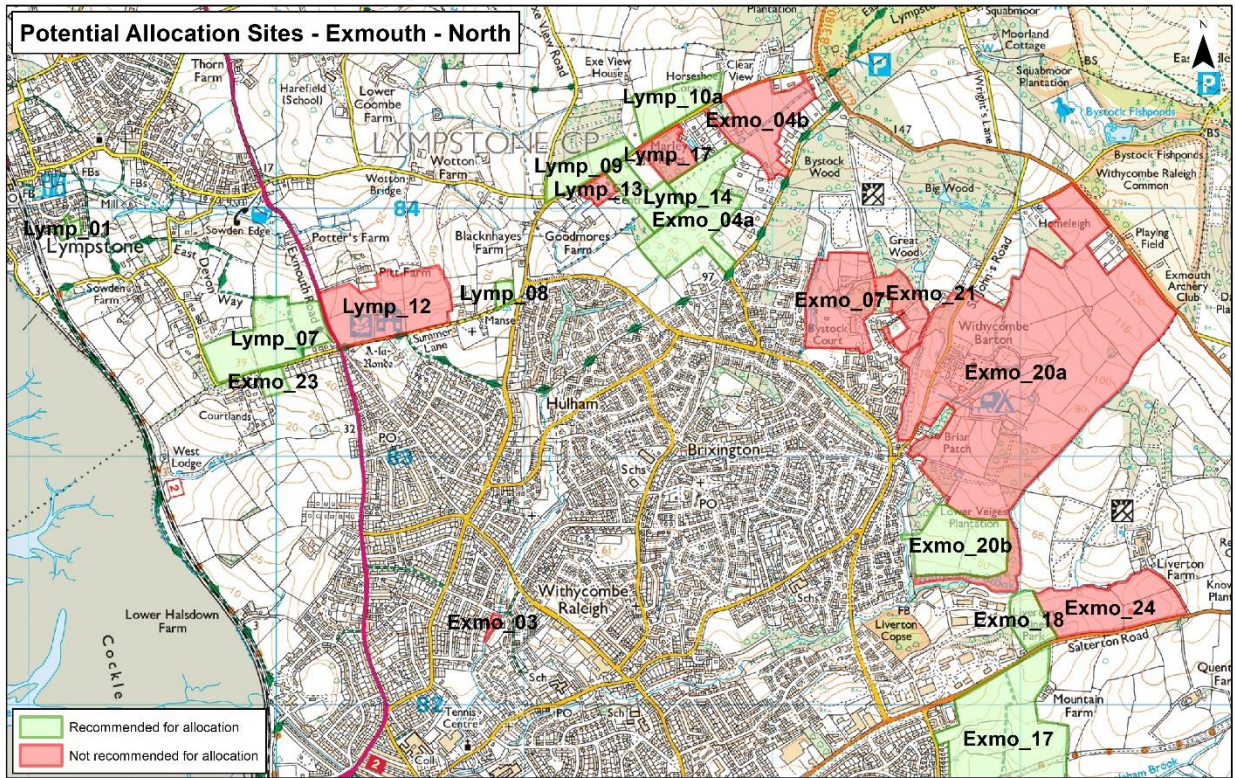
4. Sites recommended as allocations to go into the Regulation 19 plan

- 4.1 Set out below, in settlement/ward order (for settlements listed and addressed in this report) are lists of sites, as referenced and that feature in the site technical assessment documents. The tables below provides an officer recommendation on whether they should be allocated for development in the Regulation 19 draft of the local plan or not. We do not

list sites that have a planning permission for development or that were sifted out from assessment.

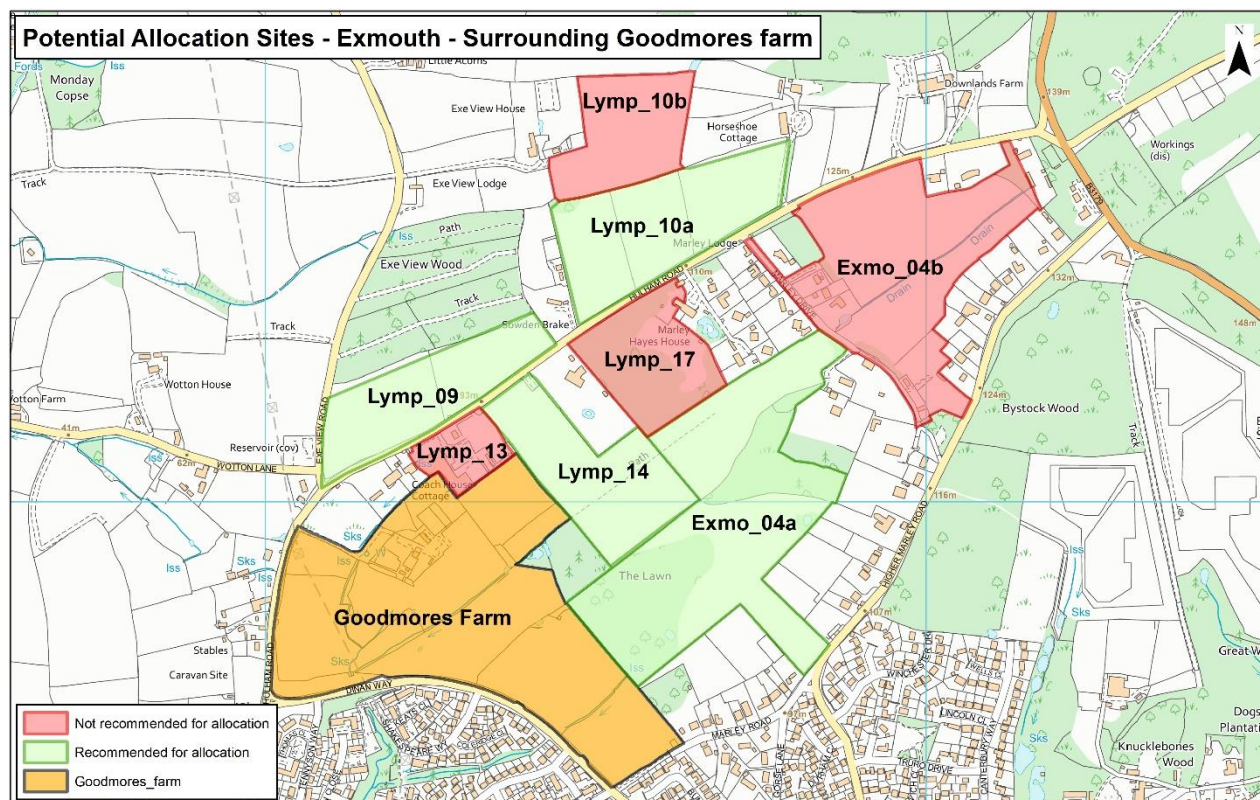
- 4.2 For feedback that relates to the sites listed in this section at the draft plan stage of consultation see: [accessible-reg-18-consultation-feedback-report-spring-2023.pdf \(eastdevon.gov.uk\)](https://www.eastdevon.gov.uk/accessible-reg-18-consultation-feedback-report-spring-2023.pdf) Feedback highlights a range of concerns associated with nearly all sites referenced in this report, whether proposed for allocation or not. There were, however, some favourable comments raised for some sites from a range of respondents and not just the site owners/promoters of those sites.
- 4.3 In the early summer of 2024 we undertook further consultation on proposed boundaries for Green Wedges and Coastal Preservation Areas (both being restrictive policies on development) as well as some other local plan matters. In some cases proposed allocations sites fell within the protective policy areas being consulted on. Full analysis of the feedback received has not yet been undertaken, a report is in production and will come to this committee. However, we would highlight that many respondents attached great weight to the protection that policies afford and were concerned about adverse impacts from development. Suggestions of environmental and wildlife losses featured heavily in feedback received as did landscape concerns. In respect of the Green Wedges there were particular concerns around settlements merging into one another in comments received and there were more general concerns expressed about impacts of development on infrastructure and its availability. Not all comments were, however, negative with some support for allocations expressed. There were also some responses that questioned the extent of designated areas and the process and methodology for defining areas included under the policies. There were also some questioning the rationale and logic for designation.
- 4.4 A spreadsheet showing these allocations will be presented at this Committee, for Members to discuss and endorse (or not), and to show a 'running total' of the number of homes being allocated. This will enable Members to see in real time the impact of decisions to allocate or not allocate sites, in terms of the overall district-wide housing requirement.

Sites at Exmouth

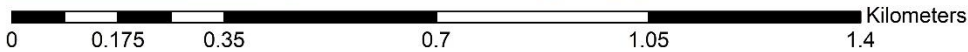
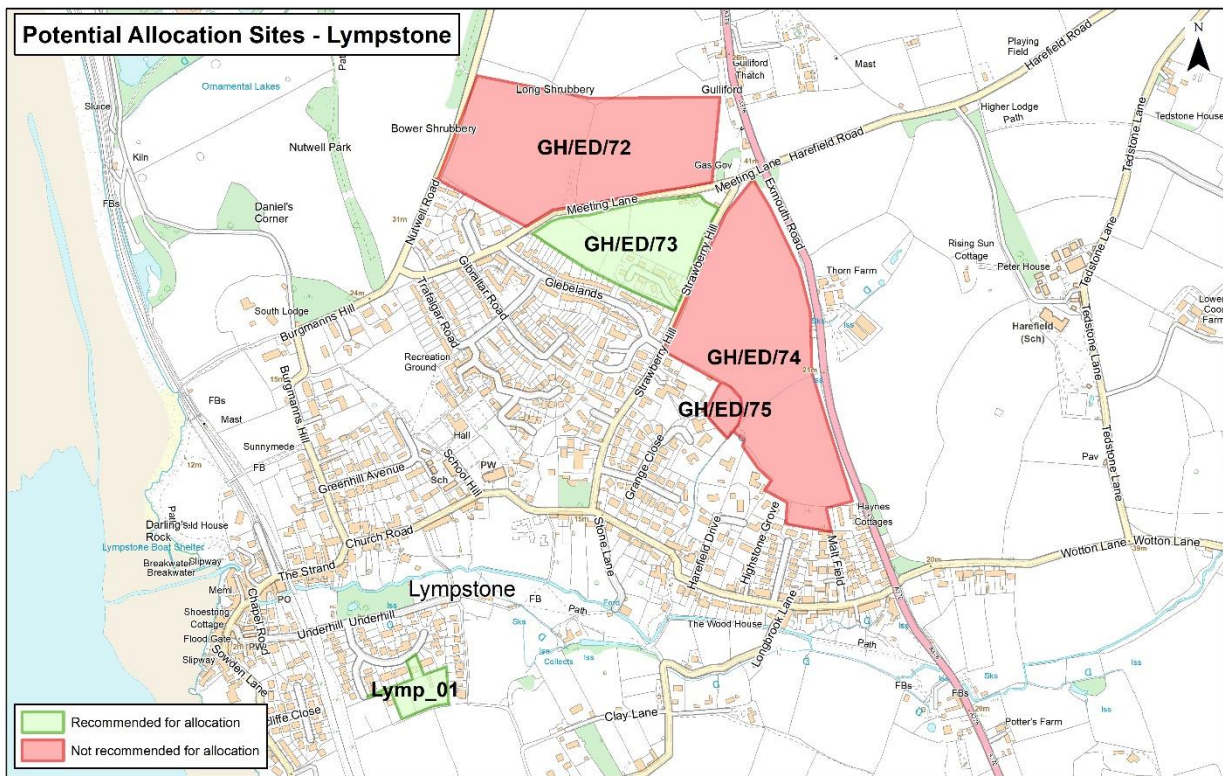


Site reference	Number of dwellings	Recommend allocating?	Succinct officer commentary – if relevant (see technical report for full assessment)
Exmouth Town Ward			
Exmo_50	20	Yes	This is a site that could potentially accommodate more than 20 dwellings. Further work is ideally needed.
Exmouth Halsdon Ward (in or adjoining)			
Exmo_03	5	No	This site falls in proposed Valley Park.
Exmo_23	12	Yes	
Lymp_07	100	Yes	This site falls in the Green Wedge area that was consulted on.
Lymp_12	174	No	This site falls in the Green Wedge area that was consulted on.
Lymp_08	14	Yes	This site falls in the Green Wedge area that was consulted on.
Exmouth Brixington Ward (in or adjoining)			
Exmo_04 – note that Exmo-12 and Exmo_45 overlap with Exmo_04	50	Yes	The credible option is that these sites, combined, will form a single allocation. Current work, at very minor variance from the draft local plan, indicates a capacity of around 263 dwellings. However, further capacity assessment work will be needed. It should be noted that there was a complex pattern of overlying sites assessed in this part of Exmouth - we show a plan at the end of this table that outlines the proposed extent of the allocation.
Lymp_09	54	Yes	
Lymp_10a – note that Lymp_15 overlaps with Lymp_10/Lymp_10a	100	Yes	
Lymp_14	59	Yes	
Lymp_17	80	No	
Exmo_07	40	No	
Exmo_21	40	No	
Exmouth Withycombe Ward (in or adjoining)			
Exmo_20a	550	No	We may need to revisit this site in response to ongoing investigations in respect of potential for development. It could have potential to accommodate several hundred houses.
Exmo_20b	150	Yes	

Site reference	Number of dwellings	Recommend allocating?	Succinct officer commentary – if relevant (see technical report for full assessment)
Exmo_24	Mixed use	No	This site was promoted as offering scope for a mixed range of uses - including employment and housing. However, numbers/areas are not quantified.
Exmo_18	2.8 hectares of employment land	Yes for employment uses	This land is allocated for employment uses in the existing local plan and is proposed for allocation in the new plan
Exmouth Littleham Ward (in or adjoining)			
Exmo_09			
Exmo_17	410	Yes	This site falls in the East Devon National Landscape. It should be regarded as 'major' in terms of the NPPF and there will need to be further assessment work.
Exmo_08	40	Yes	
Exmo_16	5	Yes	
Lymp_13	25	No	
Lymp_17	80	No	



Sites at Lympstone

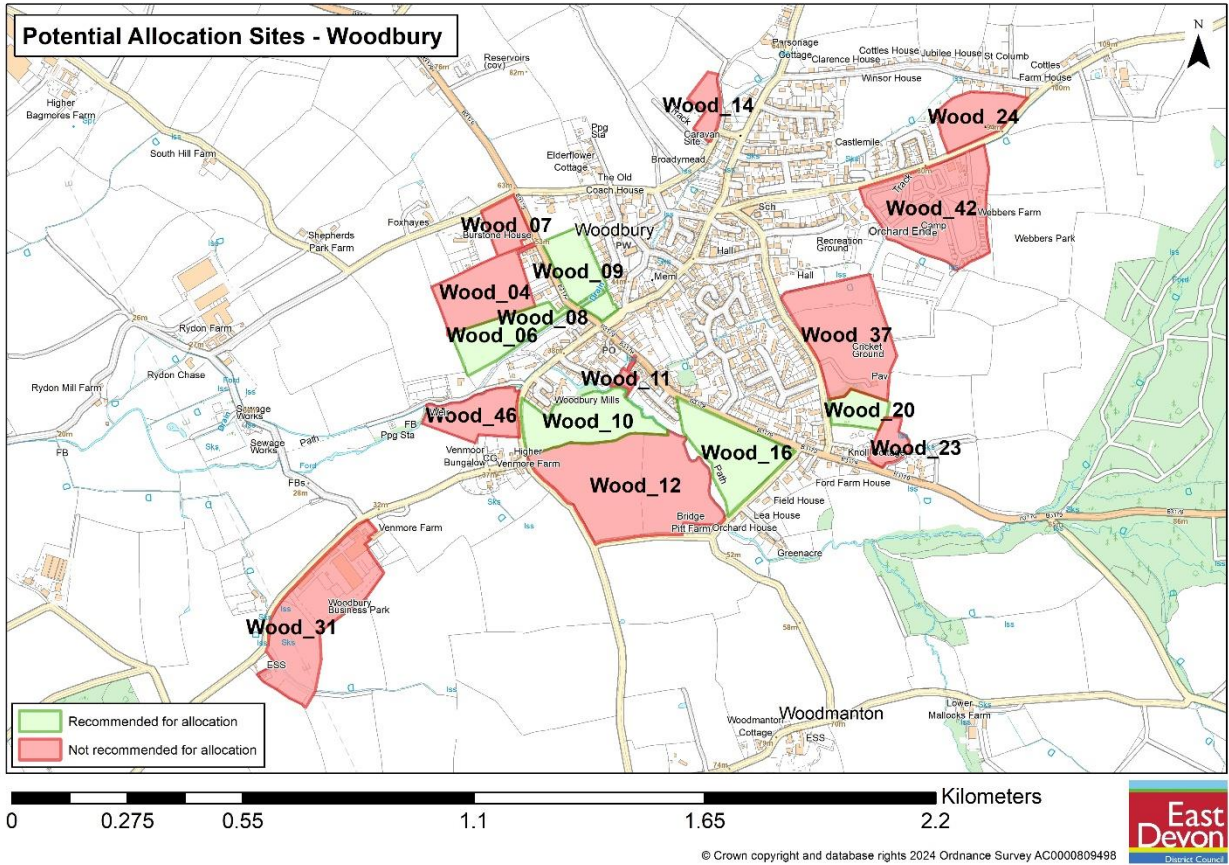


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Site reference	Number of dwellings	Recommend allocating?	Succinct officer commentary – if relevant (see technical report for full assessment)
Woodbury & Lympstone Ward			
Lymp_01	14	Yes	
GH/ED/72	131	No	
GH/ED/73	46	Yes	
GH/ED/74	141	No	
GH/ED/75	6	No	

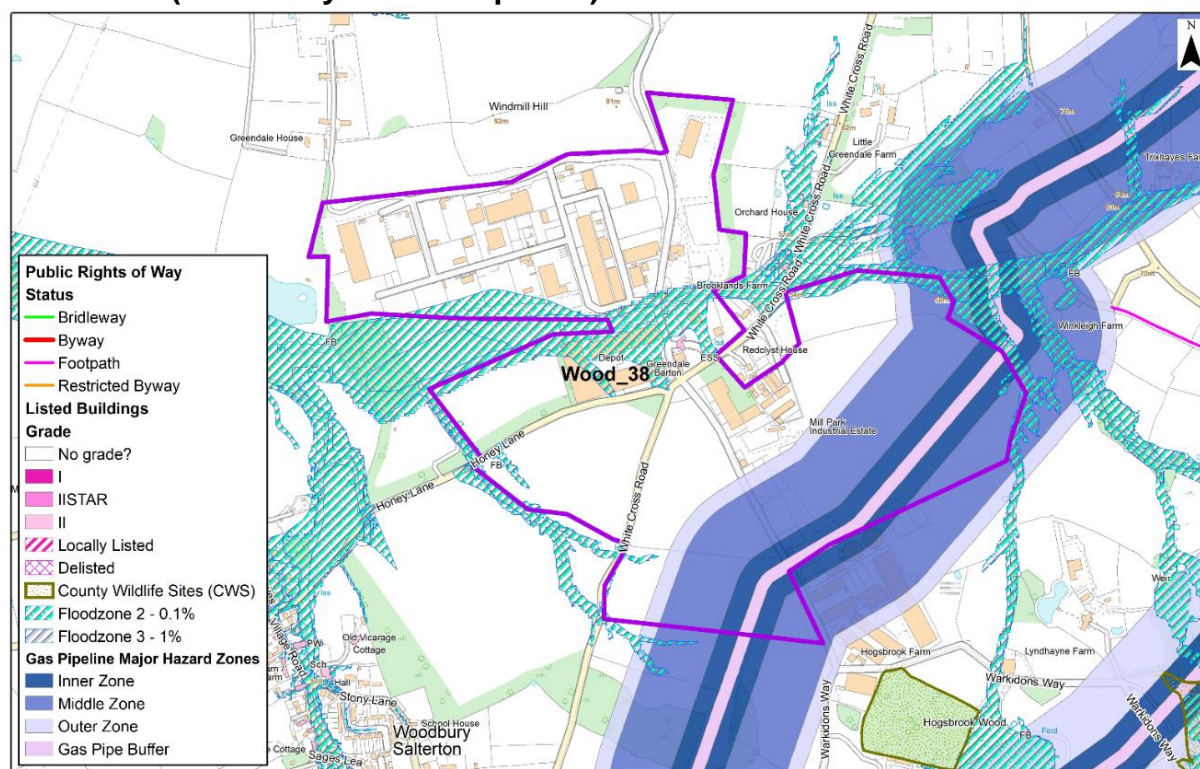
Sites at Woodbury



Site reference	Number of dwellings	Recommend allocating?	Succinct officer commentary – if relevant (see technical report for full assessment)
Woodbury & Lypstone Ward			
Wood_04	28	No	
Wood_06 – note that Wood_08 overlaps with Wood_06	30	Yes	
Wood_07	9	No	
Wood_09	28	Yes	At the working party meeting there was some enthusiasm for allocation of this site. Noted as well that there is a current planning application pending consideration at this site.
Wood_10	60	Yes	At the Working party meeting there was particular concern about the suitability of this site for allocation. Concerns were raised about highway access, in particular, though Devon County Council, as highway authority, have not raised objection.
Wood_11	5	No	
Wood_12	141	No	

Site reference	Number of dwellings	Recommend allocating?	Succinct officer commentary – if relevant (see technical report for full assessment)
Wood_14	18	No	
Wood_16	67	Yes	
Wood_20	28	Yes	
Wood_23	18	No	
Wood_24	45	No	
Wood_37	81	No	
Wood_42	101	No	
Wood_46	23	No	
Wood_31	5.5 hectares of employment land	No	

Greendale (Woodbury Salterton parish)



0 0.125 0.25 0.5 0.75 1 Kilometers

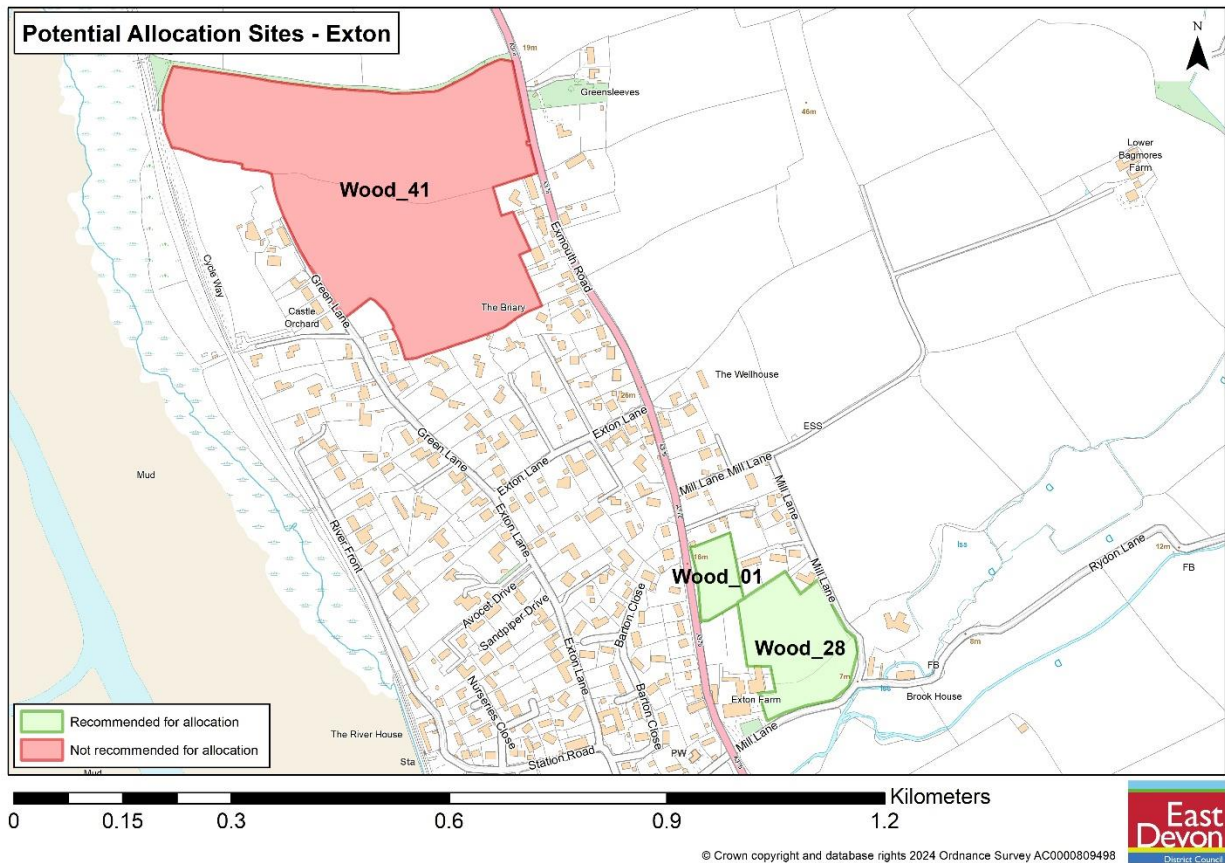
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Site reference	Hectares of employment land	Recommended allocating?
Wood_38	71.2 hectares	No

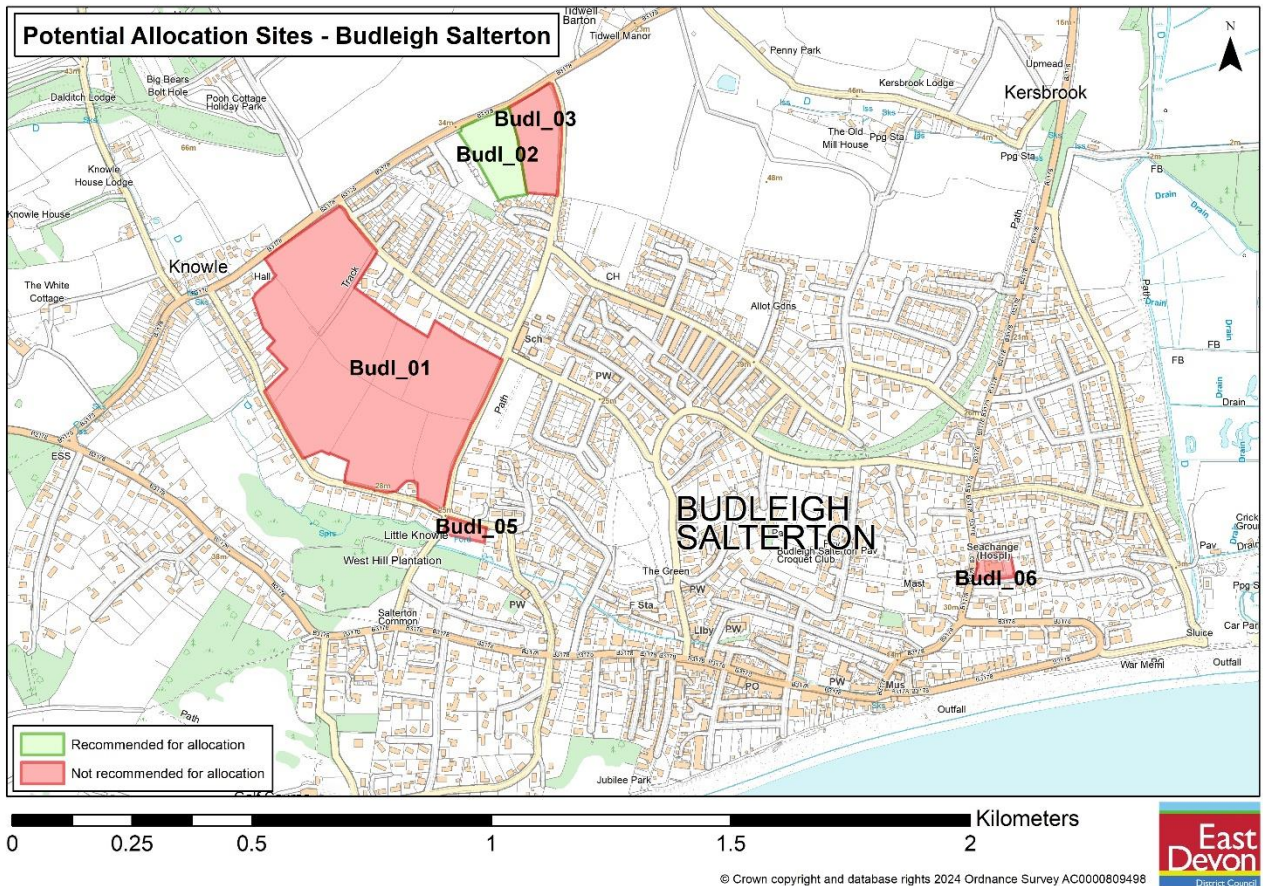
It should be noted that a further proposed allocation for a new community at Greendale/land at Crealy is also under consideration and will be presented at the meeting on the 23rd September alongside other new community proposals in the West End of the district.

Sites at Exton



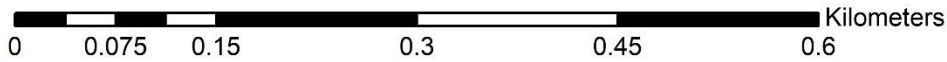
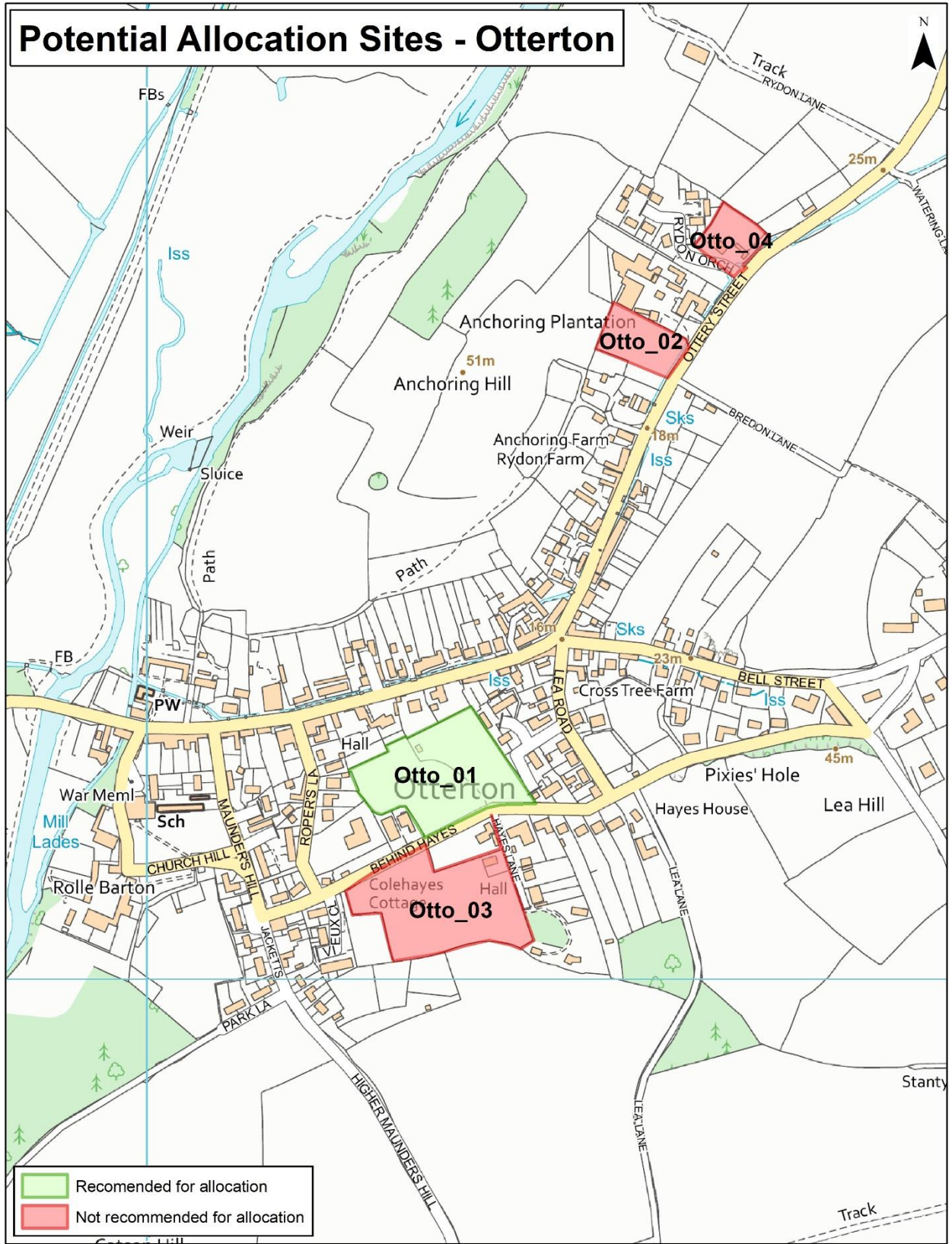
Site reference	Number of dwellings	Recommend allocating?	Succinct officer commentary – if relevant (see technical report for full assessment)
Woodbury & Lympstone Ward			
Wood_01	14	Yes	
Wood_28	39	Yes	
Wood_41	225	No	

Sites at Budleigh Salterton



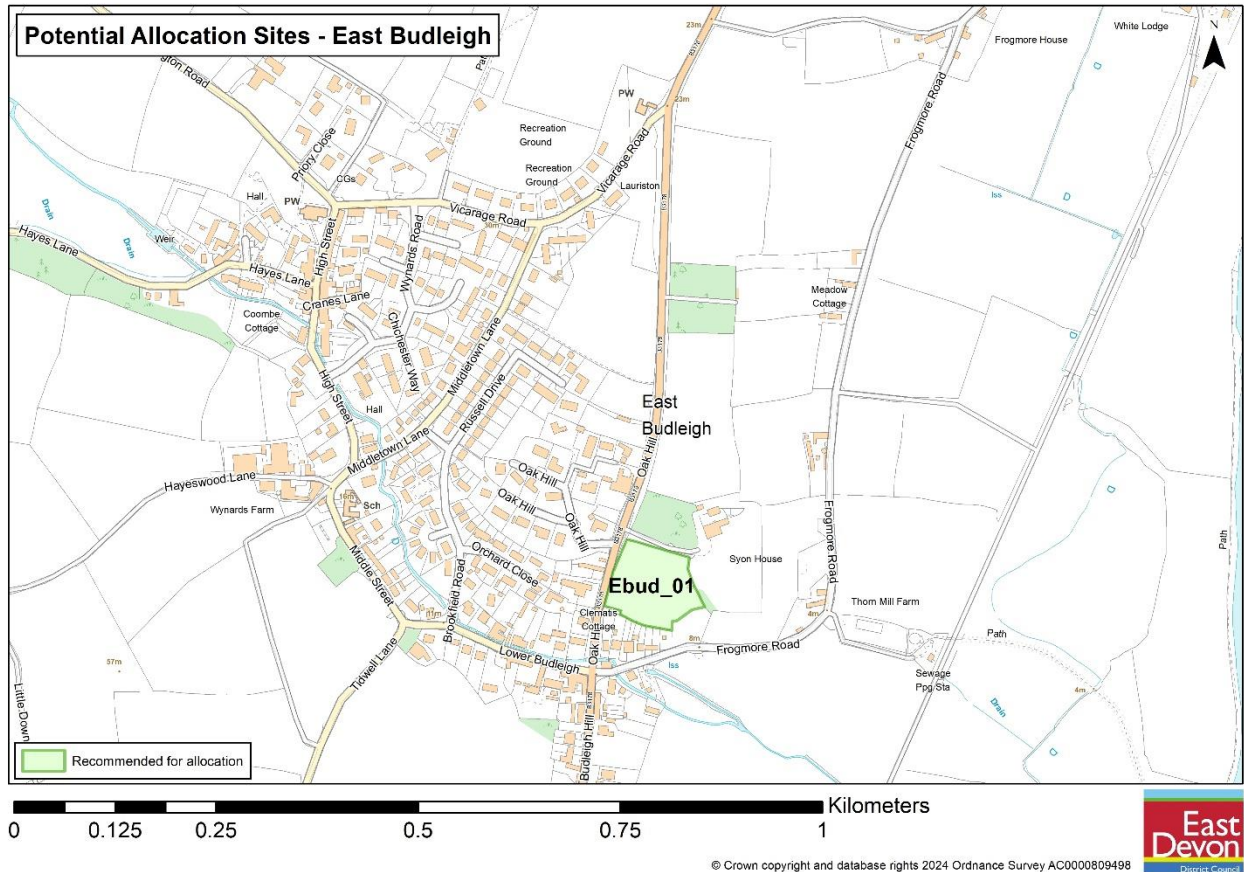
Site reference	Number of dwellings	Recommend allocating?	Succinct officer commentary – if relevant (see technical report for full assessment)
Budleigh & Raleigh Ward			
Budl_01	315	No	
Budl_01a	50	No	
Budl_02	25	Yes	
Budl_03	40	No	This site is not recommended as an allocation for development. But at the working party meeting there was some support for potential allocation.
Budl_05	5	No	
Budl_06	20	No	

Sites at Otterton



Site reference	Number of dwellings	Recommend allocating?	Succinct officer commentary – if relevant (see technical report for full assessment)
Budleigh & Raleigh Ward			
Otto_01	10	Yes	
Otto_02	8	No	
Otto_03	32	No	
Otto_04	5	No	

East Budleigh



Site reference	Number of dwellings	Recommend allocating?	Succinct officer commentary – if relevant (see technical report for full assessment)
Ebud_01	22	Yes	

5. Next steps

- 5.1 Officers will use the resolutions of this meeting to finalise drafting the Local Plan housing requirement, and the allocation of sites to meet this requirement, in the Regulation 19 Publication Local Plan. Depending on outcomes of other committee meetings, that consider other settlements and sites, there may however be a need to revisit site choices. This maybe so if total land allocations recommended for inclusion in the plan, and the dwellings they may accommodate, fall short of the levels of provision that are required to meet Government housing requirements.
- 5.2 There will, however, also need to be further refinement and testing work on sites, projected delivery rates and constraints (and opportunities) before final conclusions can be drawn.
- 5.3 As previously discussed and agreed, the Regulation 19 Publication Local Plan will come to this Committee in November 2024 with consultation scheduled to run from December 2024 to January 2025.

Financial implications:

There are no specific financial implications within the report.

Legal implications:

The legal implications are set out within the report. (002533/September/DH)