

East Devon Local Plan – Topic Paper

Chapter 9. Supporting Jobs and the Economy and Vibrant Town Centres

October 2024 – Version 01



East Devon – an outstanding place

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Contents

1	Introduction.....	4
2	The Publication draft of the Local Plan	4
3	Summary of proposed redrafting of Chapter 9 of the consultation plan	4
4	Issues and Options consultation	5
5	Draft plan consultation	5
6	Further Regulation 18 consultation Spring 2024.....	5
7	Sustainability Appraisal feedback	6
8	Habitats Regulations Assessment	6
9	Assessment of policies in chapter 9.....	6
10	Conclusions.....	71

1 Introduction

- 1.1 This is one of a series of topic papers that will sit behind and help explain the content of and evolution of the Publication draft of the East Devon Local Plan.
- 1.2 There may be new versions of this topic paper as plan making progresses to Publication and thereafter into and through plan Examination.
- 1.3 This topic paper specifically addresses Chapter 9 of the plan – supporting jobs, and the economy and vibrant town centres.

2 The Publication draft of the Local Plan

- 2.1 At the date that we published this draft topic paper we are moving towards production of the Publication draft of the local plan. There are specific Government regulations¹ that apply to local plan making and these set out actions that need to be undertaken at different regulatory stages (this report specifically relates to Regulations 18, 19 and 20).
- 2.2 The proposed Publication draft text of the local plan will be an edited and amended draft of the consultation draft plan published in November 2022². The draft plan was consulted on under plan making Regulation 18 and it should be noted that further limited additional consultation under this regulation took place in the late Spring of 2024.
- 2.3 The Publication plan, under Regulations 19 and 20, will be made available for any interested party to make representations on. The period for making such representations is currently planned to be from December 2024 to January 2025. The Publication plan, representations received and other relevant paperwork will be submitted for Examination, to a target date of May 2025. One or more Planning Inspectors will undertake the plan examination.
- 2.4 The first drafts of what is proposed to become the Publication plan will be considered by the Strategic Planning Committee of East Devon District Council through 2024. The expectation is that text will then be refined as the year progresses with a view to the Committee being asked to approve the final Publication plan in November 2024.

3 Summary of proposed redrafting of Chapter 9 of the consultation plan

- 3.1 This Chapter has not been substantially redrafted.

¹ [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

² [commonplace-reg-18-final-071122.pdf \(eastdevon.gov.uk\)](https://www.eastdevon.gov.uk/commonplace-reg-18-final-071122.pdf)

4 Issues and Options consultation

- 4.1 Prior to production and consultation on the draft local plan the Council consulted on a local plan Issues and Options³ report. This included a series of questions that responses and comments were invited on. A feedback report was published⁴.
- 4.2 Most respondents were supportive of the Council's approach to employment, agreeing that it is important to provide sufficient land in towns, at the West End and close to housing.
- 4.3 The need to protect and enhance town centre shopping facilities was considered to be very important.
- 4.4 Rural diversification and tourism were well supported but there were concerns about the impact on the natural environment, landscape and rural roads/infrastructure.

5 Draft plan consultation

- 5.1 Chapter 9 has been subject to minor changes in response to feedback received and further technical work.
- 5.2 In the draft plan consultation, economic matters were addressed in Chapter 9. The feedback report, summarising the comments can be read here (starting on page 392) [accessible-reg-18-consultation-feedback-report-spring-2023.pdf \(eastdevon.gov.uk\)](#). Detailed comments are shown in the table below.
- 5.3 The EDNA was not available at the time of the Draft Plan consultation and a number of respondents commented negatively on this. It was subsequently published in January 2023.

³ [issuesandoptionsreport-jan2021.pdf \(eastdevon.gov.uk\)](#)

⁴ [2a. Consultation feedback report Ver 03.pdf \(eastdevon.gov.uk\)](#)

6 Further Regulation 18 consultation Spring 2024

- 6.1 At the time of drafting this report further Regulation 18 consultation on selected topic matters was taking place. ‘New’ employment sites (that had not been subject to consultation previously) were consulted on with a view to potentially allocating many of them. Should other matters pertaining to employment or other economic issues be noted in feedback they will be reported on in any redrafting.
- 6.2 Detailed responses received in respect of the employment sites are detailed in the Topic Papers relating to Chapter’s 5 and 6 as these . Generally respondents agreed with the proposed allocations and supported the rejection of those that are not proposed for allocation.

7 Sustainability Appraisal feedback

- 7.1 The draft local plan was supported by a Sustainability Appraisal⁵ (SA). This SA will be updated and refined as plan making progresses and it will be one of the documents that is submitted as part of the submission for Examination.
- 7.2 The Policy approach is preferred due to policies 51 – 61 being likely to have major positive effects by fostering a strong and entrepreneurial economy, increasing access to high quality skills training, improve job opportunities and greater productivity. Policies will support the vitality and viability of town centres, will ensure good access to services and facilities, and good connectivity. The few negative effects can be effectively mitigated.

8 Habitats Regulations Assessment

- 8.1 The local plan will need to be assessed under the Habitat Regulations. An preliminary assessment of policies in the draft plan has been produced – [east-devon-local-plan-hra-110723-2013-doc-from-footprint.pdf](#) ([eastdevon.gov.uk](#))

9 Assessment of policies in chapter 9

- 9.1 Chapter 9 of the draft plan set out a series of policies that are reviewed below.

⁵ [sa-of-pos-consultation-draft-lp_2022.pdf](#) ([eastdevon.gov.uk](#))

General issues raised on Chapter 9	
<p>This Chapter sets out the policies which will apply to economic development across the District, including town centre development, retail uses, expansion of existing businesses, farm diversification and tourism. Policies are accompanied by a range of guidance notes to ensure that jobs and facilities are provided in the most appropriate locations and are not lost to other uses.</p>	
Key technical evidence sources	
<p>The key evidence which has informed this Chapter is the Economic Development Needs Assessment Economic Development Needs Assessment (January 2023) which establishes the need for different types of employment land up to 2040, identifies some broad locations and assesses the level of supply at the tie of the study.</p> <p>Other evidence of note is the Council’s Economic Development Strategy Economic Development Strategy, the Economic Review Local Economic Review, the Employment Land Review Employment Land Review, the Tourism Strategy Tourism Strategy and the Clean Growth Vision Clean Growth Vision</p>	
Issues and options consultation	
<p>Paragraph 6.11 of the Issues and Options report identifies five areas where policies could be developed to help support the economy. These include promoting jobs close to where people live, encouraging people to patronise local businesses, supporting shared workspaces, allocating additional employment sites and links between economic development and developing a greener economy. Views were sought on whether these were appropriate.</p> <p>Although most respondents (76%) ticked the yes box, a number did suggest other objectives as well as some people ticking the no box.</p>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • The responses were used to inform policy development. • Policies have been added to address using vacant space above shops for residential use and resisting out of town uses. • A commitment to producing town centre masterplans has not been made because, whilst these are useful documents that could provide a positive framework for future development, they require a level of resources which the Council cannot definitely commit to. Instead, masterplans will be produced on an ‘as needed’ basis.

<p>Paragraph 7.6 of the Issues and Options report identified three additional areas where policies may be appropriate including the use of vacant stories over shops, resisting ‘out of town’ uses to support town centres and producing town centre masterplans to identify key areas for improvement. Although most respondents (67%) ticked the yes box, a number did suggest other objectives or qualify their choice.</p>	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Lyme Regis Town Council would like more emphasis on and greater support for working from home to help with the climate crisis. • In the absence of the EDNA it isn’t possible to appropriately assess alternative strategies • Need should be assessed on a sub-regional basis, with East Devon accommodating a higher level of employment • East Devon should accommodate Exeter’s displaced employment land through allocations 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • The EDNA is now available and will inform policy making. • East Devon will meet at least the level of need identified in the EDNA. • Cross-boundary working will be undertaken with neighbouring authorities to ensure that their position is fully understood.
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Comments related to specific sites 	<ul style="list-style-type: none"> • See site specific work elsewhere. Comments not relevant to general work.
<p>Sustainability Appraisal</p>	
<p>See Sustainability Appraisal table below.</p>	
<p>Habitat Regulations Assessment</p>	

Key issues raised in consultation: <ul style="list-style-type: none"> No specific concerns raised. 	Officer commentary in response: <ul style="list-style-type: none"> No comments raised
Commentary on policy redrafting for the Publication Plan	
The comments have informed policy redrafting but do not warrant any particular amendments or require new policies.	

Strategic Policy 51 – Employment Development Within Settlement Boundaries

This Policy recognises how important settlement containment and self-sufficiency are in reducing the need to travel. It supports the retention and provision of employment uses within settlement boundaries to ensure that residents have access to a range of jobs close to their homes.

Key technical evidence sources

The key evidence which has informed this Chapter is the Economic Development Needs Assessment [Economic Development Needs Assessment \(January 2023\)](#) which establishes the need for different types of employment land up to 2040, identifies some broad locations and assesses the level of supply at the tie of the study.

Other evidence of note is the Council’s Economic Development Strategy [Economic Development Strategy](#), the Economic Review [Local Economic Review](#) and the Employment Land Review [Employment Land Review](#)

Issues and options consultation

Paragraphs 6.4 to 6.7 of the Issues and Options report explains why much of the recent employment development has occurred near to Exeter and where future job growth could be located. We set out a number of differing potential areas in East Devon that could accommodate future job growth and development and asked people to indicate their level of support. Overwhelmingly respondents supported increased homeworking in future. This will have wide ranging implications, for example in future housing design and infrastructure

Officer commentary in response:

- The responses are noted, particularly the support for homeworking (which is also reflected in the lower demand for office space in the EDNA evidence).
- It is disappointing that responses were low and many of the options received very little comment.

<p>requirements, particularly broadband provision, and a need for less office space.</p> <p>The other options did not result in very clear preferences. There was slightly more support for additional development in the towns, villages and countryside than opposition but significant numbers of respondents did not express a preference or left the form blank.</p> <p>The suggestion that additional employment development should be located close to Exeter, including a focus on the West End, did not elicit a preference from most respondents, although the slight majority of those that did express a view were not supportive.</p>	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation:</p> <p>Respondents were generally supportive of the principle of encouraging employment at settlements and providing local jobs and jobs alongside new housing.</p> <ul style="list-style-type: none"> • Strong support for improving town centres and focussing employment in them. • More specific points included: • Devon Wildlife Trust advised that Natural context is missing from this policy. Reference should be made to the inclusion of the natural environment within employment areas in order to ensure that people are able to work in areas where they are connected with nature. • Policy is contradictory- only allowing employment if there are no adverse amenity impacts could exclude most 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • The policy approach to locating and retaining employment development at settlements and providing employment alongside housing was supported by respondents and is the approach that the plan has taken. • The suggestion that natural/green space should be accommodated within employment areas is not included in this policy but will be delivered through biodiversity net gain and other policies. • Many of the suggestions- for example the need for better paid jobs for local residents- are objectives in the Economic Strategy and will be delivered through actions associated with that document as well as the policies in this Chapter eg by requiring a commitment to training and skills. • Other matters, such as town centre development, are picked up in other policies in this Chapter.

employment uses, thus allowing a change of use to residential.

- Need to create well paid jobs for local people, not just encourage specialist employees to move to the region. The existing local workforce need improved and better skills training, the choice of jobs being made available, and increased wages. A lovely natural environment doesn't compensate for low wages.
- Housing development needs to be explicitly linked to increases in employment land so local people can work close to home.
- Clyst Honiton Parish Council believed that commercial development in rural areas should provide jobs for locals and not increase traffic. They are concerned that office developments could lead to more vehicle movements.
- Gittisham Parish Council stated that the Local Plan's allocation of 15ha of employment land at Honiton is excessive, given the amount of vacant employment land and floorspace in the area. The council also believes that the development of high-quality employment opportunities at other sites in East Devon will make Honiton less attractive as an employment location.
- Support policy approach of resisting loss of employment land but this approach should be further strengthened by a policy that limits housing development if additional employment land is not developed in parallel.
- Support joint commission of Economic Development Needs Assessment for the greater Exeter area. Crucial to ensure that the extra employment land will be sufficient to

accommodate the additional jobs required and siting will be suitable and minimise commuting.

- Employment opportunities should be developed within or next to existing employment sites, and not within residential developments.
- There should be a coherent framework for recovery and growth beyond allocating slabs of bare employment land. EDDC is well placed to encourage sustainable economic activity by supporting established businesses, encouraging start-ups, and creating a positive and welcoming environment for the sector.
- Economic growth is entirely compatible with the green agenda.
- A range of independent businesses should be encouraged, and selling and producing local products would support this.
- Business parks (such as Liverton) should not be expanded until they are full.
- Redevelopment of business parks (such as Pankhurst) indicates that there is not a need for large commercial uses.
- Commercial use in the countryside should be restricted to farms and agricultural use only.
- Failure to control ancillary use has led to a proliferation of retail and hospitality at out-of-town centre locations, damaging town centres.
- The Plan should include a positive strategy for the future development of town centres and masterplans for all East

<p>Devon towns to set out the measures (and actions) to meet their potential</p> <ul style="list-style-type: none"> • Each town centre should have an individually tailored set of proposals (or Masterplan) to take them through the Plan period. These should comprise a mix of specific proposals and general policies pertaining to that town. They should be core sections within an East Devon Local Plan, as they are everywhere else. • Town centres need basic maintenance and cleaning; decent essential facilities and services; modest levels of investment and adequate, reasonably priced parking. Town centres in East Devon look and feel neglected and abandoned. • Decent town centres are essential to tourism 	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • This policy was not specifically consulted on at that time. Employment allocations were subject to consultation. 	<p>Officer commentary in response: Representations on the individual sites have been taken into account through the site assessment process.</p>
<p>Sustainability Appraisal</p>	
<p>See Sustainability Appraisal table below.</p>	
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • No specific concerns raised. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • No comments raised
<p>Commentary on policy redrafting for the Publication Plan</p>	

Redrafted policy title:
<ul style="list-style-type: none"> • Policy SE 01 - Employment Development Within Settlement Boundaries
Changes to this policy have been minimal since the draft consultation. In the previous Local Plan there were several employment policies which related to provision and loss of employment land within settlement boundaries. This policy was written in consultation with development management and economic development colleagues and is considered to combine the key points in these previous policies in a more concise way.

Strategic Policy 52 – Employment Development in the Countryside

This policy balances protection for the character and qualities of the countryside with promoting appropriate scale employment. It recognises that, whilst the overall strategy is to locate most employment at the West End and in the tiered settlements to promote self containment and reduce the need to travel, there is still a need to permit small scale employment in the countryside in the countryside to support rural communities, focused on expansion of existing sites, and small scale development focused on utilising existing buildings and previously developed land.

Key technical evidence sources

The key evidence which has informed this Chapter is the Economic Development Needs Assessment [Economic Development Needs Assessment \(January 2023\)](#) which establishes the need for different types of employment land up to 2040, identifies some broad locations and assesses the level of supply at the tie of the study.

Other evidence of note is the Council’s Economic Development Strategy [Economic Development Strategy](#), the Economic Review [Local Economic Review](#), the Employment Land Review [Employment Land Review](#), the Tourism Strategy [Tourism Strategy](#)

Issues and options consultation

See General Issues above.

Draft Plan consultation

Key issues raised in consultation:	Officer commentary in response:
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- This policy received quantified support as some respondents felt that employment in the countryside should be linked to rural activities/produce and there was concern that unacceptable impacts could arise from traffic and noise.
- National Farmers Union state that farm businesses will always need to develop and adapt in order to meet market requirements and also stay viable. This is not always 'intensification' as stated in the draft plan but may just be moving into a different part of the agricultural sector, which would require different infrastructure. Where a business can show a need to develop in order to remain financially viable it is important that the local plan can facilitate this or it risks contraction in agricultural businesses and a loss of employment.
- Object to policy as it doesn't recognise benefits of business parks in the countryside eg Greendale Barton. Agents for the owners say that the site is not isolated, a major A road with bus stops runs alongside it, the site is very attractive to businesses and is fully occupied, it is operationally sustainable due to being exclusively powered by renewable energy generated on site and the owners have a 22 ha expansion plan to enhance overall sustainability as well as providing for more businesses. In future it will meet the needs of the new town.
- Support a wide mix of sites and intensification/extension of successful sites

- This policy complements the previous policy by enabling some employment development in the countryside, outside the settlement boundaries.
- Some responses referred to a need to relate countryside employment to rural activities only, this is considered too onerous in itself (given that many successful non-rural businesses operate in the countryside already), however the policy is restricted to supporting expansion of existing businesses and reuse of rural premises rather than giving carte blanche to establishing new employment uses on greenfield sites. This is considered to strike a fair balance between protecting the countryside and reducing the need to travel and ensuring that employment is available to rural communities.
- Farm diversification and tourism are addressed in other policies so do not need to be permitted under this policy.
- Impacts of development, eg amenity, traffic etc are considerations that will apply under other policies of the plan.
- The potential conflict between this policy requiring rural buildings to be well located in relation to tier 1-2 settlements and the farm diversification policy (refers to 1-4 settlements) is noted and policy wording has been amended.
- The point that policy should refer to expansion/extension rather than just intensification will be incorporated into policy

- Include policy reference to need to balance adverse aesthetic impacts against benefits in areas of high employment demand
- Include reference in policy to additional consideration being given to existing employers to safeguard existing valuable jobs
- Re-use of existing rural buildings only where they are not close to residential buildings so would not impact upon their amenity with additional traffic, noise etc.
- Intensification of current operations is permitted with some constraints, but need greater consideration of the impact on residents and traffic. Workshops using heavy machinery generate noise and cause distress to nearby residents.
- First section of policy requires criteria on which to judge potential harm.
- Second part of policy is unrealistic in terms of being readily accessible to the Tier 1 and 2 settlements via a range of modes of transport, and noting that the farm diversification policy refers to access to tiers 1-4.
- Is this policy intended to apply to agricultural development? A separate policy for agricultural buildings and other development such as slurry lagoons would be better.
- Policy should require a demonstrable demand for new Employment development in the countryside as otherwise there is the risk the land could be used for residential purposes by default.
- This policy is open to mis-use.

- Too permissive and open ended. Development in the countryside should be limited to that which supports local and rural enterprise and has no visual impact or requirement for HGV's unsuitable for local lanes.
- Commercial uses in the countryside should be associated with agricultural use, increasing sustainability and access to local produce. This would reduce need to import food.
- Converting old farm buildings such as barns into independent shops ie a farm shop or to rent as a home or holiday is ok, but priority must be given to agricultural workers.
- Local farm shops should be encouraged (Exmouth was suggested as a potential location)
- This is standard policy to control these circumstances but should be enforced.
- The East Devon AONB team support the requirements that “the scale, siting and appearance of buildings and activities associated with the proposed development is appropriate to the rural character of the area and will not adversely impact local amenity” and “no adverse impact on the character of surrounding natural or historic environment”.
- Policy is too restrictive by not applying to existing business parks, industrial estates, and employment sites in the countryside – need to provide opportunities for rural businesses to grow, crucial for the prosperity of the rural economy.
- Support intensification of existing rural employment businesses but policy text does not reflect more supportive justification text.

<ul style="list-style-type: none"> • Hawkchurch Parish Council - As it stands, this policy could allow development that would have adverse effects on local neighbourhoods because of increased traffic, noise, etc. Criteria should be included that address such potential impacts. It would also be worth considering the location in relation to settlement boundaries – any such business in the immediate vicinity is more likely to have adverse impacts on communities. • Policy must be explicit that development includes the intensification of businesses via the expansion of their operational sites. 	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • This policy was not specifically consulted on at that time. Employment allocations were subject to consultation. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Representations on the individual sites have been taken into account through the site assessment process.
<p>Sustainability Appraisal</p>	
<p>See Sustainability Appraisal table below.</p>	
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • No specific concerns raised. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • No comments raised
<p>Commentary on policy redrafting for the Publication Plan</p>	
<p>Redrafted policy title:</p> <ul style="list-style-type: none"> • Policy SE 02 - Employment Development in the Countryside 	

The policy was redrafted to refer to extension of existing employment businesses as well as intensification. The explanation as to what constitutes development was deleted as it is set out in legislation. The criteria relating to re-use of rural buildings was expanded to ensure that buildings are not taken out of active agricultural use

Strategic Policy 53 – Farm Diversification

This policy recognises the importance and changing role of agriculture and the need for new employment in rural areas as a means of supporting long term agricultural viability. Changes in agriculture have made diversification increasingly important and this policy enables farms to generate additional income to support farming activities whilst avoiding harm to, and integrating into, the local area. There is considerable potential synergy between a greener economy and farm diversification.

Policy focuses on development where the scale and type is appropriate to the existing business and the rural character of the area. The priority is for making use of available and suitable buildings on a holding. New buildings, where justified and acceptable, should be well integrated with the existing holding to help them harmonise with the surrounding environment.

Key technical evidence sources

The key evidence which has informed this Chapter is the Economic Development Needs Assessment [Economic Development Needs Assessment \(January 2023\)](#) which establishes the need for different types of employment land up to 2040, identifies some broad locations and assesses the level of supply at the time of the study.

Other evidence of note is the Council’s Economic Development Strategy [Economic Development Strategy](#), the Economic Review [Local Economic Review](#), the Employment Land Review [Employment Land Review](#), the Tourism Strategy [Tourism Strategy](#)

Issues and options consultation

See General Issues above.

Draft Plan Consultation

Key issues raised in consultation:

- The Environment Agency support this policy and welcome acknowledgment that it may be necessary to limit the scale of

Officer commentary in response:

- The particular infrastructure requirements that are likely to apply to rural farm development are noted and are acknowledged in the policy.

on-farm anaerobic digester. There are some existing sites in the district that attract complaints and further expansion should be considered very carefully, especially for businesses that could cause additional or new complaints regarding odour, noise, dust, or other nuisances.

- Suggest that 'established farm holdings' are defined as those that have been operational for some years until present.
- National Farmers Union support the policy but state that it is hard to always remove all adverse impacts and these must be viewed objectively and not allowed to be weighted heavily against a proposal
- Need to consider what adverse impacts such as traffic, noise or other pollution, there may be when in, for example an historic village or hamlet, close to homes / with quiet lanes used by residents for walking, cycling, horse riding etc. Here the adverse impacts would likely be greater than those in the open countryside and carry greater weight against any positive impacts.
- The policy needs a bolder, clearer statement that the loss of farmland from food production will be resisted. Diversification should be supported but primarily as a means of ensuring continued food production and only as a last resort to move into other land uses.
- Last bullet should be re-worded more positively, ""proposals provide for the retention of hedgerows and trees and improvement in biodiversity"".
- A further bullet - that any diversification are to have no impact on existing views of hill-sides, AONB and ridge lines.

- Farm holdings will be qualified as those that have been established for at least 10 years.
- A balance is struck in policy between adverse impacts and the wider benefits of development
- Although Policy sets out particular criteria to be applied, this is because the characteristics of rural farms are different to those of other types of employment development and this is a more permissive policy than would usually apply in the countryside. Other plan policies and requirements (such as landscape, ecology and heritage) will still apply.
- The range of uses to be permitted will be widened although this will need to be accompanied by a viability statement to ensure that it is a genuine, sustainable long term diversification scheme.

- A demand for new Employment development on Farms must be demonstrated to avoid this land being used for residential purposes by default.
- There is potential conflict with the rural workers accommodation policy in so far as rural farm accommodation could be used as holiday accommodation under a diversification application and this should be controlled.
- Alternative methods of food production that keep emissions of greenhouse gases to a minimum should be encouraged. Precision Fermentation could be a community-led way of sustaining the local populace but would need infrastructure such as energy and water to support it which need planning for.
- Encouraging diversification makes sense to allow additional income streams for farming businesses.
- Farm buildings should be retained for their heritage value and uses should be appropriate to this eg no unsightly scrap yards etc
- The picture accompanying this policy is not a farm.
- These are standard provisions to control this kind of development.
- The East Devon AONB team support the requirements that “the scale, siting and appearance of buildings and activities associated with the proposed development is appropriate to the rural character of the area and will not adversely impact local amenity” and “no adverse impact on the character of surrounding natural or historic environment”.
- Paragraph 1 is too restrictive in specifying use classes which could prevent additional and much needed income streams; the criteria in paragraph 3 will ensure proposals are

acceptable. The policy should be worded more flexibly like current Local Plan Policy E4	
Supplementary Regulation 18 consultation Spring 2024	
Key issues raised in consultation: This was not subject to consultation at that time.	Officer commentary in response:
Sustainability Appraisal	
See Sustainability Appraisal table below.	
Habitat Regulations Assessment	
Key issues raised in consultation: <ul style="list-style-type: none"> No specific concerns raised. 	Officer commentary in response: <ul style="list-style-type: none"> No comments raised
Commentary on policy redrafting for the Publication Plan	
Redrafted policy title: <ul style="list-style-type: none"> Policy SE 03 – Farm Diversification 	
The draft policy has been amended to widen the range of diversification activities that will be supported and place less restrictions on prioritising E(g), B2 and B8 employment uses, however this also means that a viability statement is required to demonstrate how the activities will support the long term sustainability of the farm holding. This is felt to strike an appropriate balance between recognising that these types of employment activities may not usually be permitted in rural areas and may lead to some adverse impact and demonstrating how this is to be outweighed by the positive benefits of such development. Because the District’s rural farms do have special characteristics not shared by other types of development or activity, the policy is quite detailed in setting out the criteria that will apply, the particular infrastructure requirements and the potential impacts on the farm business, buildings and character but, as with all policies, these will be applied in conjunction with the whole plan policies.	

Strategic Policy 54 – Resisting the Loss of Employment Sites	
<p>Existing employment sites and proposed employment allocations in East Devon are nearly all in places where housing accommodates or is planned to accommodate much of the labour supply, and where future housing on new local plan allocations will be concentrated. This enables settlements to be more self-contained and better able to support local communities, as well as reducing the need to travel. Relatively few sites were submitted for consideration as employment land and competition for land from higher value uses can make delivering employment development very challenging, whether new build or for redevelopment. The plan therefore includes this policy aimed at retaining existing or proposed employment sites and land provided that they are available, suitable and achievable over the plan period. The EDNA and supporting analysis of employment sites provides vital information in justifying the identification of existing and proposed employment sites in East Devon.</p> <p>This policy focuses on protecting employment land in order to maintain sufficient supply of employment land, providing a range and choice of sites over the plan period. The EDNA provides the evidence about the amount of need for employment land but, given the low level of brownfield sites available in East Devon, the need for additional employment land is mostly going to be met on greenfield sites. To avoid the risk of needing to identify even more sites to mitigate loss of employment land to other uses, it is essential that existing Employment Areas within the existing settlements are protected to maintain the quantity and enhance the quality of the employment capacity they provide.</p>	
Key technical evidence sources	
<p>The key evidence which has informed this Chapter is the Economic Development Needs Assessment Economic Development Needs Assessment (January 2023) which establishes the need for different types of employment land up to 2040, identifies some broad locations and assesses the level of supply at the time of the study.</p> <p>Other evidence of note is the Council’s Economic Development Strategy Economic Development Strategy, the Economic Review Local Economic Review, the Employment Land Review Employment Land Review</p>	
Issues and options consultation	
See General Issues above.	
Draft Plan Consultation	
Key issues raised in consultation:	Officer commentary in response:

<p>Exmouth Town Council made a general comment that, in Exmouth, the existing policy relating to the loss of employment land has not proved effective and they have lost several employment land allocations in favour of housing development. More robust protection is needed; Clyst Honiton Parish Council believes that this policy may be too restrictive, as it could prevent villages from developing in a way that benefits their residents. Some villages have had unwanted employment sites for many years, and local people would like to see these sites redeveloped into housing. Keeping these sites derelict can harm the village's schools and local services, and the council is concerned that this policy could prevent villages from addressing this problem; Churchill Retirement Living supports the need to retain high-quality employment sites, but they have concerns about the wording of policy⁵⁴. The term "employment" is not defined, and the preconditions listed in the policy are too extensive and time-consuming. They would delay the regeneration of previously developed sites.</p>	<ul style="list-style-type: none"> • This policy generated few comment as there wasn't a question directly related to it. • This policy is more tightly worded than the previous policy and the requirements for demonstrating that a site is no longer viable are clearly set out in guidance. This would address Exmouth Town Council's concern that sites have been lost because the policy wasn't effective as well as Clyst Honiton's concern that sites are derelict and could be given alternative uses. • Employment is defined at the beginning of the chapter and in the glossary. • The listed requirements are comprehensive and, whilst it may be time consuming to market a site and consider reasonable alternative uses, it is essential to ensure that viable site aren't lost to higher value uses
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation: This policy was not subject to consultation at that time</p>	<p>Officer commentary in response: None</p>
<p>Sustainability Appraisal</p>	
<p>See Sustainability Appraisal table below.</p>	
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation: <ul style="list-style-type: none"> • No specific concerns raised. </p>	<p>Officer commentary in response: <ul style="list-style-type: none"> • No comments raised </p>

Commentary on policy redrafting for the Publication Plan
Redrafted policy title: <ul style="list-style-type: none"> • Policy SE 04 – Resisting the loss of Employment sites
This Policy attracted relatively few comments and has not been substantively redrafted other than some very minor rewording and reordering for clarity and flow.

Strategic Policy 55 – Employment and Skills Statements

This policy requires larger developments to commit to providing Employment and Skills Statements in order to provide work experience, apprenticeship and other training opportunities and should relate to the demolition, site preparation and construction phases of development. They will usually be secured through a suitably worded pre-commencement planning condition and/or a S106 legal agreement.

Key technical evidence sources

CITB: Construction Industry Training Board - CITB has an evidence base which justifies and demonstrates that the benchmarks requested are proportionate and achievable.
<https://www.citb.co.uk/media/1bdedmf1/english-client-based-approach-contractor-guidance.pdf> sets out the employment and skills benchmarks to be used as a starting point for negotiations with developers

Issues and options consultation
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<p>Paragraphs 6.8 to 6.10 of the Issues and Options report discuss what sort of jobs the local plan should encourage, including the opportunities to attract new and emerging sectors with highly skilled jobs. We asked about the level of support for different options.</p> <p>Support was strongest for more local entrepreneurs (51.8% strongly support) and traditional sectors (37% strongly support),</p>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • The support is welcomed and the comments have borne out the anecdotal and economic review evidence provided by the Economic Development Team
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<p>followed by more high tech jobs (30.3% support) and, finally, more jobs through new and larger employers (17.6% support), with more than a quarter of respondents having no opinion on the latter and more than 7% opposing or strongly opposing this option.</p>	
<p>Draft Plan Consultation</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Devon County Council state reference should be made to the Skills Academy, aeronautical engineering opportunities and implications of moving towards Net Zero. • The trigger is too high, should be required at much lower thresholds • Clarification is required as to the type of skills and ensure they are inclusive • Schools, colleges and HE providers need to be involved as well as employers • What is EDDC's strategy for employment? How can a policy be written without the supporting evidence • Further evidence is required, the policy is unsound. If there is a skills gap, it should either be a matter for the education sector to address or if there are training needs a matter for an employer to identify and address as they see fit. • Imposing additional financial obligations relating to this requirement is yet another financial burden on development, resulting in the potential to reduce job creation and the opportunities naturally presented for informal on the job learning. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • The Draft Plan didn't contain a proposed policy, rather it was an indication as to what the policy should consider. The approach now proposed to be taken to these statements is based on the CITB guidance and benchmarks as these are tried and tested elsewhere in Devon (and nationally). • The approach is likely to vary between developers and scheme so the opportunities offered will differ but all will need to meet the benchmark standards set out in the guidance. • The thresholds have been applied successfully in other Devon authorities. It is considered that they are high enough that viability won't be unduly impacted and the requirements can be managed through the available Council resources but they will apply to enough schemes that a meaningful number of training opportunities will be delivered.

<ul style="list-style-type: none"> • This requirement is too onerous and too big a risk for the developer- eg the end users may be as yet unknown, there is no evidence that the end users will have either a skills gap or be feasibly able to deliver on commitments. • This will create a disadvantage to developers in East Devon competing against sites in authorities without such requirements • Jobs need to be created for local people, and not just specialist jobs to encourage more people into the region. It must start at local level first. The existing local workforce must see an improvement in more and better skills training, the choice of jobs being made available, with an associated improvement of wages • Let the market decide without any further interference. • Important to support growing sectors, but unclear how the policy will do this • Developers must adhere to the statements and EDDC take action to enforce them • Apprenticeships are key- Skills in wood carpentry, thatching and farming in the agricultural area must be encouraged. Many skills have been lost. • Independent and sustainable businesses should be the focus, to reduce commuting • Over prescriptive, and far too complicated. The costs of implementing this policy will exceed any benefit. 	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation: This was not the focus of consultation at that time.</p>	<p>Officer commentary in response: None</p>

Sustainability Appraisal	
See Sustainability Appraisal table below.	
Habitat Regulations Assessment	
Key issues raised in consultation: <ul style="list-style-type: none"> No specific concerns raised. 	Officer commentary in response: <ul style="list-style-type: none"> No comments raised
Commentary on policy redrafting for the Publication Plan	
Redrafted policy title: <ul style="list-style-type: none"> Policy SE 05 – Employment Skills Statements 	
Policy was indicative at Regulation 18 stage and it has now been evidenced and reworded. The policy is based on a tried and tested approach, thresholds which have been successfully applied in nearby authorities and the benchmarks that will be applied are proportionate and achievable.	

Strategic Policy 56 – Town Centre Hierarchy, Sequential Approach and Impact Assessment

This strategic policy establishes the network and hierarchy of town centres within which town centre development policies will apply and the threshold and sequential test which will be applied to town centre uses that are proposed elsewhere. Maintaining the vitality and viability of the town centres in East Devon is a strategic priority in the plan.

This policy is also the starting point for the suite of non-strategic policies on town centres and primary shopping frontages, local shops and services, and rural shops.

It sets out the sequential test threshold that will apply to town centre uses proposed outside town centres.

Key technical evidence sources

[1a. Role and Function of Settlements_report_v3 final draft for SPC.pdf \(eastdevon.gov.uk\)](#)

<https://eastdevon.gov.uk/media/yxdkdfpo/3a-retail-town-centres-and-sequential-test-topic-paper-appendix-1.pdf>

Issues and options consultation

Question 27 sought views on respondents preferred pattern of development.

There was little difference in the popularity of options 1, 2 and 3. Option 1 to retain the same settlement hierarchy as the current Local Plan was marginally the most popular, chosen by 149 respondents, closely followed by option 2 to have fewer villages (143 respondents), and then option 3 for a higher number of villages (142 respondents). An alternative approach was suggested by 83 respondents (14% of the total).

Officer commentary in response:

- Noted, however town centre policy will apply to those settlements with town centre shops and facilities. Whilst these are mostly Tier 1 and 2 settlements, there are several smaller ones that fall into the Tier 3 and 4 categories.

Draft Plan Consultation

Key issues raised in consultation:

- Unsure how this will regenerate town centres.
- Support that out-of-centre sites should be accessible by bicycle and well connected to the centre.
- ‘Edge of (town) centre’ developments should only be allowed where it is shown there will be no adverse impact on the vitality and economic vibrancy of its nearby town centre.
- Prefer current policy.
- Object to inclusion of Hawkchurch as a Tier 4 settlement on transport grounds (only one bus per week) and concern that

Officer commentary in response:

- This is a strategic policy that establishes the settlements which contain town centres to which the other town centre related policies will apply.
- Many of the respondents raise matters of detail which are outside the scope of this policy.
- The hierarchy of settlements is established through other policies in the Plan and this policy can’t change them.
- Settlements with a town centre are a matter of fact.
- Policy has been amended to make it clear that the centre should be accessible by public transport, foot and bicycle.

shop is reliant on volunteers and will be engulfed by the proposed allocation.

- This hierarchy seems wrong. Tier 3 centres vary considerably. Budleigh is fairly large. Lympstone has a train line. The other three settlements should be tier 4.
- The accessibility of edge-of-centre and out-of-centre sites on foot and bike needs to be such that anyone can use the provision rather than only being possible for those who are fit and able or confident enough.
- Exmouth town should be redeveloped as it has lost its historic character and is bland and run down. This could extend to celebrating maritime heritage on the seafront, restoring the arcade building and building a new swimming pool with hot tubs
- Independent businesses with a focus on sustainability need encouraging. Farm shops could be located in towns.
- Focus housing in the town centres (especially Exmouth) as an alternative to building on the AONB's/countryside
- Shop frontage and signs must also be kept in keeping with the heritage of the area as this too can have a negative impact on the area.
- Artisan markets and craft markets and farmers markets should be encouraged.
- Out of centre sites should be actively discouraged and policy should reflect this. A 'sequential test' is very unlikely to be robust enough to protect our town centres.
- The policy does not recognize the problems that our town centres face, the issue of adequate and cheap parking, and does not offer any hope for improvement

<ul style="list-style-type: none"> • Sidmouth Cycling Campaign support the policy that out of centre sites should be accessible by bicycle and well connected to the centre. • Exeter Cycling Campaign would like 'by these modes' to be added after 'centre'. Currently this doesn't actually say that they should be well-connected to the centre by public transport, bicycle and foot. They can be accessible from some other point by all those things, but not necessarily the centre, so this should be explicitly stated. 	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation: None Specifically although town cenpolicy boundaries</p>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Insert item <p>Insert item</p>
<p>Sustainability Appraisal</p>	
<p>See Sustainability Appraisal table below.</p>	
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • No specific concerns raised. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • No comments raised
<p>Commentary on policy redrafting for the Publication Plan</p>	
<p>Redrafted policy title:</p> <ul style="list-style-type: none"> • Strategic Policy SE 06 - Town Centre Hierarchy, Sequential Approach and Impact Assessment <p>This strategic policy identifies those settlements with town centres within which the town centre policies will apply and the threshold and approach to the sequential test for town centre uses proposed elsewhere. It has not been significantly amended as most responses highlighted matters that were beyond the scope of the policy however a section has been added to clarify that Cranbrook town centre will be subject to the policies of the Cranbrook Plan.</p>	

Strategic Policy 57 – Town Centre Development	
<p>In line with the NPPF, the council supports the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. As part of a positive strategy for the future of each town centre, through this policy the Local Plan defines their extent and makes clear the range of uses that are acceptable within them.</p>	
Key technical evidence sources	
<p>1a. Role and Function of Settlements_report_v3 final draft for SPC.pdf (eastdevon.gov.uk) https://eastdevon.gov.uk/media/yxdkdfpo/3a-retail-town-centres-and-sequential-test-topic-paper-appendix-1.pdf</p>	
Issues and options consultation	
<p>Question 15 sought views on these options and we set out a number of differing potential uses and approaches to promoting town centre vitality and activity. Levels of support were sought.</p> <p>Most respondents favoured mixed commercial uses in town centres, with over half of respondents supporting leisure or community uses and very little opposition to these. Dominant retail use (as has traditionally been promoted by policy) received around 30% support and a similar level of opposition. . In the written comments the use of upper floors for services, community</p>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Support for vibrant town centres offering a range of retail and other services, is noted, and policy will seek to support this.

<p>activities and housing was strongly supported and a range of measures suggested to encourage this.</p> <p>A significant proportion of respondents (around 20%) were opposed to change of use to housing, although this also received considerable (quantified) support. In the written comments most concern related to the permanent loss of retail units to housing and the consequent impact on the retail function of the town centres. Edge-of-centre and first floor residential use received considerable support.</p> <p>The need for town centres to be vibrant social spaces was expressed by many respondents. A range of activities, areas to sit and increased community, health and service uses were seen as a major draw.</p>	
<p>Draft Plan Consultation</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Devon County Council welcome this policy but suggest it is strengthened to ensure there is no overall erosion of critical mass of activity within its retail core. • Devon Wildlife Trust advised the requirement for enhancement of the natural environment should be included within this policy. The provision of well designed, connected, diverse natural corridors through town centres can act as important flagship projects showcasing the benefits of the natural environment. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • It is agreed that centres should be accessible by bicycle and that enhancement of the natural environment within town centres should be required where possible, therefore the policy has been amended accordingly. • Other suggestions are largely outside the scope of this policy, either because they seek to control/reduce uses which the NPPF considers appropriate for town centres or because they relate to detailed matters in specific town centres.

- Cranbrook town centre is poorly designed and doesn't really exist. It isn't clear where the shops are/will be and they aren't close to the station.
- Support the reference to shop frontages as it is consistent with the current SPD relating to Exmouth's shop front policy.
- Object to loss of retail premises to housing.
- The statement that change of use to residential will only be permitted if 'there is no demand for town centre use' should be strengthened. With an increasing number of businesses closing it would be good to see more positive proposals for invigorating town centres.
- Should Beer really be in this group?
- Exmouth Town centre lacks visual appeal. There needs to be more character and are good examples of this are Sidmouth, and cities such as Bath.
- Rejuvenation (of Exmouth) is a must and to encourage independent, sustainable businesses rather than more hairdressers, charity shops and fast food outlets.
- This is a standard version of a long-established policy. The use of upstairs accommodation for residential purposes is greatly discouraged because many of our town centre buildings are listed or are situated in a Conservation Area, so alterations to allow occupation are very expensive and are often rejected.
- Exeter Cycling Campaign would like to explicitly mention the need to enable cycling as a means of transport, with prominence given to properly-designed and located cycle parking. Towns like Honiton and Axminster currently have

<p>very few Sheffield cycle parking stands and these are often inconveniently located.</p> <ul style="list-style-type: none"> • Churchill Retirement Living supports the proposed Exmouth Town Centre boundary. 	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation: This consultation focussed on the policy wording and the proposed Town Centre Area and Primary Shopping Area boundaries.</p> <p>Around 100 responses were received and these were split across all of the proposed town centre areas. The vast majority of respondents were satisfied with the policy and proposed policy boundaries, however there were numerous suggestions as to how the town centres could be improved and how the boundaries could be amended.</p> <p>The responses to the question about Town Centre Retail Areas reveal a wide range of concerns and suggestions. Many respondents express worries about the decline of town centres, the impact of out-of-town developments, and the need for revitalisation. There are also comments about specific towns, parking issues, and the importance of supporting local businesses.</p> <p>Several respondents offer suggestions for improvements and policy changes.</p> <p>Key points raised, in order of frequency:</p> <ol style="list-style-type: none"> 1. Concerns about out-of-town developments 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Many of the responses relate to matters that are outside the scope of the policy (for example operational/management issues such as cleanliness, the need to offer free car parking or restrict chain stores from operating) or relate to matters of detail in specific town centres. • With regard to the impact of town centre policy on settlements in neighbouring authorities, there are two market towns in close proximity to the boundary of East Devon which could potentially be impacted by proposals at Axminster. Both towns are similarly in character to Axminster and offer a similar range of facilities although Chard has three supermarkets and Lyme Regis has one smaller, town centre store whilst Axminster has two. It is not proposed to significantly expand or alter the extent of the town centre in Axminster and so it is not clear what ‘influence’ on Lyme Regis Dorset County council are referring to. • Devon County Council raise concerns that sufficient car parking should be provided to meet the needs of visitors to the towns. Car Parks are included within the town centre boundaries (recognising their importance) so that the impact of any proposed changes of use can be assessed. In any case, most are local authority owned and have not been submitted through the HELAA for consideration.

<ul style="list-style-type: none"> ○ Opposition to building units for national chains outside existing town centres ○ Warnings about the negative impact on town centre vitality 2. Parking and accessibility issues <ul style="list-style-type: none"> ○ Calls for more affordable and accessible parking ○ Suggestions for park-and-ride facilities and pedestrianisation 3. Support for local and independent businesses <ul style="list-style-type: none"> ○ Emphasis on the uniqueness of independent businesses in East Devon ○ Need for lower business rates and better council engagement 4. Town-specific concerns and suggestions <ul style="list-style-type: none"> ○ Calls for redevelopment of specific areas (e.g., Magnolia Centre in Exmouth) ○ Suggestions for improvements in Axminster, Exmouth, and other towns 5. Environmental and design considerations <ul style="list-style-type: none"> ○ Prioritisation of trees, shade, and natural drainage in town centres ○ Careful design to maintain existing character while allowing for expansion 6. Classification and designation concerns <ul style="list-style-type: none"> ○ Questions about the classification of smaller settlements like Lympstone ○ Clarification needed on development policies for non-designated areas 7. Adaptation to changing retail landscape <ul style="list-style-type: none"> ○ Need to address balance between town centres and online shopping 	<ul style="list-style-type: none"> ● DCC suggest that converting underused upper floors of shops into high-quality flats could benefit town centres by increasing footfall and supporting local businesses and this is encouraged through the policy. ● DCC also say that, to safeguard the long-term vitality of town centres, the policy must prioritise protecting core retail and leisure areas and implement strict controls on changes of use. This is proposed through the policy. ● With regard to the policy boundaries, most were supported in their proposed positions. ● In Exmouth it was suggested that the bus/train station should be excluded from the town centre, as should Exeter Road. Both of these suggestions were considered when the boundary was drawn. The bus and train stations are located on the edge of the main shopping area, however they lie immediately next to car parks, a small supermarket and leisure centre and these are all considered to be town centre uses, therefore the boundary includes them. Exeter Road extends some distance out from the main retail concentration in the town centre, however it contains a collection of shops, food outlets and community buildings as well as houses, all of which are considered to be town centre uses. The shopping area designation does not extend as far as the town centre area, recognising that Exeter Road is not a primary location for retail use. ● In Honiton it was suggested that New Street should be excluded from the Primary Shopping Area and this should focus on the High Street. This is not supported as the same concentration of shops extends from the High Street into the northern end of New Street and there is no discernible difference in the retail character.
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- Recognition of declining demand for retail space and need for town centres to adapt
- 9. Tourism and visitor economy
 - Concerns about declining visitor numbers and hotel accommodation
 - Need for policies to support tourism and attract higher-spending visitors
- 10. Public realm and town centre attractiveness
 - Calls for investment in improving existing town centres
 - Concerns about declining maintenance and cleanliness of public spaces

Statutory organisations summary

Devon County Council

Support the overall policy. However, concerns arise about how this will be achieved through the proposed Tier 1 and Tier 2 retail areas. While encouraging sustainable transport, the importance of sufficient car parking for those travelling from further afield cannot be overlooked. To maintain vibrant town centres, a balance between these options is essential. Additionally, converting underused upper floors of shops into high-quality flats could benefit town centres by increasing footfall and supporting local businesses. To safeguard the long-term vitality of town centres, the policy must prioritise protecting core retail and leisure areas and implement strict controls on changes of use. This will prevent the gradual erosion of town centres and maintain their appeal to residents and visitors alike.

Historic England

- Various minor amendments were suggested at Ottery St Mary to ensure that specific businesses are included in the Town Centre and Primary Shopping Areas. These are rejected on the basis that the town centre is focussed on the area where most non-residential activity takes place and, whilst these additional areas do include retail and other businesses they are located sporadically and interspersed with numerous houses.
- In Seaton, respondents have requested that the Primary Shopping areas be extended to form one continuous area rather than two separate areas. This would follow the boundary of the Town Centre Area. This suggestion is rejected on the basis that the Primary Shopping Areas contain the main concentration of retail uses and these are located in two distinctly separate parts of the town centre with intervening residential and other non-retail uses between them.
- In Sidmouth it is suggested that the Town Centre and Primary Shopping Area should extend along the seafront to include the visitor accommodation along it. This suggestion is resisted because, although these uses could be appropriate in a town centre, they are not retail uses, and they are peripheral and very different in character to the rest of the Town Centre Area. In any case, they are covered by the sustainable tourism policy in the plan.

Welcomes the policy’s focus on enhancing town centres and the Council will seek opportunities to the natural and historic environment.

Dorset Council

Raised concerns about the East Devon Local Plan's potential impact on neighbouring areas. Specifically, they believe that the plan should consider the influence of nearby settlements like Lyme Regis when determining town centre development.

Axminster Town Centre

Why do you feel this way and do you have any other comments?

The responses to the question about site Axmi_16 not being allocated express a range of perspectives. While some commenters support the non-allocation decision, citing concerns about infrastructure capacity and the need to preserve commercial uses in the town centre, others argue that the site's brownfield status makes it suitable for residential redevelopment. There are also calls for a balanced approach that considers the wider needs of the growing Axminster community.

Key points raised, in order of frequency:

1. Infrastructure and Service Capacity Concerns
 - Doubts about the ability of Axminster's infrastructure, including roads, schools, and

public transport, to support additional housing development

- Worries that the town has already reached a saturation point for new housing

2. Importance of Retaining Commercial Uses

- Views that the site should remain in commercial use to support the town centre and local amenities
- Concerns about the loss of important facilities like the Co-op store

3. Support for Residential Redevelopment of Brownfield Sites

- Belief that brownfield sites like Axmi_16 are suitable for housing development
- Potential for the site to provide much-needed affordable housing

4. Calls for a Balanced Approach

- Acknowledgment of the need to consider the wider benefits and impacts of development allocations
- Suggestions that Axminster has already experienced a high level of housing growth

5. Concern over process

- Feeling that all areas have been drawn inconsistently, with some areas in Axminster being included when excluded in others and vice versa.

Statutory organisations summary

<p>None</p> <p>Axminster:</p> <ul style="list-style-type: none">• No specific suggestions for inclusion or exclusion were made in the comments provided <p>Beer Town Centre</p> <p>The responses to the question about the proposed Beer Town Centre Area and Primary Shopping Area are generally positive, with respondents appreciating the current character and offerings of Beer. However, there are some suggestions for improvements and concerns about future growth and sustainability. The comments touch on various aspects, including the village's appeal, environmental considerations, and broader issues affecting town centres.</p> <p>Key points raised, in order of frequency:</p> <ol style="list-style-type: none">1. Satisfaction with current layout and usage<ul style="list-style-type: none">○ Reflection of current usage in the proposed areas○ Appreciation for Beer's existing character and offerings2. Environmental enhancements<ul style="list-style-type: none">○ Suggestion to prioritise trees and shade in the town centre○ Incorporation of natural drainage systems	
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3. Limited room for growth
 - Concern about lack of space for future expansion
4. Business and economic considerations
 - Need to address balance between town centres and online selling
 - Call for lower business rates to support local businesses
5. Positive attributes of Beer
 - Recognition of Beer as a popular and well-supported village
 - Appreciation for local amenities (beach, pubs, restaurants)

Statutory organisations summary

None

Beer:

- No specific suggestions for inclusion or exclusion were made in the comments provided

Budleigh Salterton Town Centre

The responses to the question about the proposed Budleigh Salterton Town Centre Area and Primary Shopping Area reveal mixed feelings. While some respondents are satisfied with the current layout, others express concerns about empty shops and the need for adaptation. There's a strong emphasis on preserving the town's unique character while also addressing challenges faced by local businesses.

Key points raised, in order of frequency:

1. Preservation of town character
 - Desire to maintain Budleigh's unique charm and layout
 - Satisfaction with current town centre arrangement
2. Concerns about empty shops and retail decline
 - Noticeable increase in vacant retail spaces
 - Suggestion to ease conversion of shops to residential use
- Planning and development issues
 - Calls for faster decision-making on commercial applications
 - Criticism of delays in approving new developments (e.g., Old Sorting Office)
4. Environmental improvements
 - Suggestion to prioritise trees, shade, and natural drainage in the town centre
5. Parking and accessibility

- Importance of maintaining easy parking and vehicle access for trade

Statutory organisations summary

None

Budleigh Salterton:

- No specific suggestions for inclusion or exclusion were made in the comments provided

Colyton Town Centre

The responses to the question about the proposed Colyton Town Centre Area and Primary Shopping Area show a mix of satisfaction with the current layout and frustration with the proposal process. While some respondents agree with maintaining the existing retail area, others express concerns about the utility of the proposal and the quality of local shopping options.

Key points raised, in order of frequency:

1. Satisfaction with current layout
 - Agreement that the existing retail area should remain the same
 - Recognition that the proposal reflects current usage

2. Criticism of the proposal process
 - Frustration with proposing what already exists
 - Concern about time and money spent on the proposal
3. Suggestions for alternative improvements
 - Call to keep public toilets open
 - Recommendation to focus on road resurfacing in the town centre
4. Concerns about local shopping options
 - Lack of decent convenience stores
 - Poor selection of produce
5. Local government agreement
 - Colyton Parish Council's support for maintaining the existing retail area

Statutory organisations summary

None

Colyton:

- No specific suggestions for inclusion or exclusion were made in the comments provided

Exmouth Town Centre

The responses to the question about the proposed Exmouth Town Centre Area and Primary Shopping Area reveal a general dissatisfaction with the current state of the town centre. Many respondents express concerns about the dated appearance, lack of variety in shops, and the need for significant improvements. There are also suggestions for redevelopment, environmental enhancements, and a call for better engagement with property owners and businesses.

Key points raised, in order of frequency:

1. Need for improvement and modernisation
 - Town centre described as run-down, dated, and lacking appeal
 - Specific concerns about the Magnolia Centre's appearance and maintenance
 - Calls for updating and redeveloping key areas, including the former post office site
2. Suggestions for environmental enhancements
 - Recommendations for more trees, planting, and natural drainage
 - Desire to minimise concrete and improve overall aesthetics
3. Retail and business concerns
 - Recognition of changing shopping habits and increase in online shopping
 - Need for more variety in local independent shops

- Suggestions to allow conversion of long-term empty shops to residential use
- 4. Housing and residential development
 - Proposals to encourage residential development in certain areas
 - Suggestions for mixed-use developments with residential units above shops
- 5. Concerns about area coverage
 - Disagreements about which areas should be included or excluded from the town centre designation
 - Suggestions to include or exclude specific areas like the train station, bus stops, and harbour
- 6. Investment and engagement
 - Calls for investment in the town centre area
 - Need for better engagement with property owners and businesses
 - Concerns about high business rates
- 7. Specific improvement suggestions
 - Ideas for improving the Strand area, underpass, and signage
 - Prioritising town centre improvements over seafront development

Statutory organisations summary

None

Exmouth:

- Suggestion to exclude train/bus stations area (Comment 4)
- Suggestion to exclude Exeter Road from town centre designation, recommending it for residential development instead (Comment 5)

Honiton Town Centre

The responses to the question about the proposed Honiton Town Centre Area and Primary Shopping Area show a mix of opinions. While some respondents are satisfied with the current layout, others suggest improvements and express concerns about the viability of town centre retail. There's a focus on balancing retail needs with housing demands and addressing broader economic challenges facing town centres.

Key points raised, in order of frequency:

1. Retail concentration and vacant units
 - Preference for keeping retail focused on the High Street
 - Concern about empty units and suggestions for their use
2. Mixed-use development proposals
 - Suggestion for integrating residential accommodation above retail spaces
3. Economic challenges for town centres
 - Need to address competition from online shopping

- Call for lower business rates and better council engagement with businesses
- 4. Satisfaction with current layout
 - Recognition that the proposal reflects the existing town centre
 - Honiton Town Council's approval of the representation

Statutory organisations summary

None

Honiton:

- Suggestion to exclude New Street from retail area and keep retail focused on High Street (Comment 1)

Ottery St Mary Town Centre

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Ottery St Mary Town Centre Area and Primary Shopping Area reveal a mix of opinions, with several suggestions for boundary adjustments and concerns about the town centre's future viability. There's a focus on protecting and supporting local

businesses while also considering mixed-use development opportunities.

Key points raised, in order of frequency:

1. Boundary adjustment suggestions
 - Proposals to extend or modify the town centre and primary shopping area boundaries
 - Specific mentions of including more of Mill Street, Yonder Street, and certain pubs
2. Economic challenges and support for local businesses
 - Need for a forward-looking plan to prevent decline
 - Calls for lower business rates and better council engagement with businesses
 - Preference for supporting small, independent traders
3. Mixed-use development proposals
 - Suggestion for integrating residential accommodation above retail spaces
4. Preservation of town character
 - Importance of maintaining the town's unique character while supporting development

Statutory organisations summary

None

Ottery St Mary:

- Suggestion to extend boundary along Yonder Street to the Institute
- Suggestion to extend along Mill Street to Winter's Lane
- Suggestion to extend to include all of Mill Street up to the Vets
- Question about the importance of keeping Cornhill and Jehu within the primary area
- Suggestion to include the Lamb and Flag pub in Batts Lane

Seaton Town Centre

The responses to the question about the proposed Seaton Town Centre Area and Primary Shopping Area reveal significant concerns about the town's retail landscape. Many respondents highlight issues with the current layout, particularly the split caused by the Tesco development, and express worries about potential out-of-town developments further impacting the town centre. There's a strong desire for revitalisation and support for local businesses.

Key points raised, in order of frequency:

1. Impact of out-of-town developments

- Concerns about proposed retail units destroying the town centre
- Negative effects of the Tesco development on town centre footfall
- Opposition to further out-of-town retail parks
- 2. Need for town centre revitalisation
 - Calls for reshaping and better defining the town centre retail area
 - Suggestions for introducing a market to help local businesses
 - Desire for more variety in shops
- 3. Split shopping area concerns
 - Recognition of the disjointed nature of Seaton's shopping area
 - Need to address the divide created by the Tesco development
- 4. Mixed-use development proposals
 - Suggestion for integrating residential accommodation above retail spaces
- 5. Boundary adjustment suggestions
 - Proposals to include specific areas like Harbour Road and the old station frontage

Statutory organisations summary

None

<p>Seaton:</p> <ul style="list-style-type: none">• Suggestion to include the land in Harbour Road to help connect the two split shopping areas• Suggestion to include the Post Office• Suggestion to include the old station frontage area• Concern about the split nature of the primary shopping area created by Tesco development <p>Sidmouth Town Centre</p> <p>Why do you feel this way and do you have any other comments?</p> <p>The responses to the question about the proposed Sidmouth Town Centre Area and Primary Shopping Area show a mix of satisfaction and concerns. While some respondents are content with the current layout, others suggest improvements and express worries about the challenges facing town centres in general. There's also a focus on the need for better integration of the seafront area and support for local businesses.</p> <p>Key points raised, in order of frequency:</p> <ol style="list-style-type: none">1. Satisfaction with current layout	
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<ul style="list-style-type: none"> ○ Recognition that the proposal reflects current usage ○ Some respondents feel Sidmouth is fine as it is 2. Concerns about out-of-town developments <ul style="list-style-type: none"> ○ Warning against building units for national chains outside the town centre 3. Need for improvements and maintenance <ul style="list-style-type: none"> ○ Suggestions for improving building frontages in certain areas 4. Mixed-use development proposals <ul style="list-style-type: none"> ○ Suggestion for integrating residential accommodation above retail spaces <p>Statutory organisations summary</p> <p>None</p> <p>Sidmouth:</p> <ul style="list-style-type: none"> • Suggestion to extend the boundary to include the seafront and businesses along there (Comment 6) 	
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Sustainability Appraisal	
See Sustainability Appraisal table below.	

Habitat Regulations Assessment	
Key issues raised in consultation: <ul style="list-style-type: none"> No specific concerns raised. 	Officer commentary in response: <ul style="list-style-type: none"> No comments raised
Commentary on policy redrafting for the Publication Plan	
Redrafted policy title: <ul style="list-style-type: none"> Policy SE 07 – Town Centre Development 	
This policy was generally supported. Most negative comments from respondents related to matters beyond the scope of the policy, for example objecting to changes of use within town centres that are supported by the NPPF or allowed as PD. Policy has been amended to support the incorporation of cycle provision and enhancement of the natural environment where possible. Policy boundaries will be shown on the Policies Map and have not been amended as a result of the Supplementary Regulation 18 Plan consultation.	

Strategic Policy 58 – Local Shops and Services	
This policy encourages and supports the provision of new local shops and services, recognising the benefit to local communities. They will be restricted to a scale that will not undermine the provision in nearby centres. Policy also resists the loss of local shops and services requiring evidence that they are no longer viable before permitting a change of use or redevelopment.	
Key technical evidence sources	
Issues and options consultation	
This Policy was not subject to consultation.	Officer commentary in response: <ul style="list-style-type: none"> None
Draft Plan Consultation	

<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Local shops and services overly restrictive eg no craft shop allowed • Fully support, communities would be damaged by village shops closing • Lack of footfall is not the main issue, viability and high running costs are leading pubs/PO's to close • Local facilities reduce the need to travel, especially important in rural areas with limited public transport • The policy is fine, but our planning team do not require evidence of lack of viability to be supplied, and certainly do not question that evidence. As is so often the case, it is not the policy but its application that is the problem 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Policy has not been amended in light of the responses. • It is, however, proposed to rewrite it for brevity and clarity.
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation: This Policy was not subject to this consultation</p>	<p>Officer commentary in response: None</p>
<p>Sustainability Appraisal</p>	
<p>See Sustainability Appraisal table below.</p>	
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • No specific concerns raised. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • No comments raised
<p>Commentary on policy redrafting for the Publication Plan</p>	
<p>Redrafted policy title:</p> <ul style="list-style-type: none"> • Policy SE 08 – Local shops and services 	

Policy has been redrafted to improve the brevity and clarity. The content has not substantively changed. The maximum floorspace figure is now explained in the policy rather than relying on a footnote.

Strategic Policy 59 – Rural Shops

In accordance with the NPPF, this policy promotes retail development in rural areas where products are sourced or manufactured locally as this will allow diversification in agricultural businesses and promote local food production, supporting the rural economy. The criteria set out in the policy restricts the scale of development and origin of goods to be sold to reflect the countryside location and ensure that the vitality and viability of town centres in the District is not undermined in line with the Local Plan strategy.

Key technical evidence sources

Council’s Economic Development Strategy [Economic Development Strategy](#), the Economic Review [Local Economic Review](#), the Employment Land Review [Employment Land Review](#)

Issues and options consultation

See General Issues above.

Draft Plan Consultation

Key issues raised in consultation:

- Local shops and services is overly restrictive (e.g. wouldn’t permit a craft shop)
- Seems unlikely that the 30 mile radius policy would ever be enforced!
- Support this policy. Farm shops are good, but we need to develop town and village centres too.

Officer commentary in response:

- Relatively few comments were made on this policy.
- Most respondents supported rural shops in principle but expressed concern as to how the requirements will be monitored and enforced.
- Evidence suggests that some ‘farm shops’ are selling a majority of imported products sourced nationally and internationally despite similar products being available from businesses within East Devon. This particularly applies to food and drink products.

<ul style="list-style-type: none"> • Need more sustainable retail including farm shops and shops that sell locally made items. Too much stuff is bought from overseas making this unsustainable. • ED has a vast array of creators and agricultural farms that we must work together with. Darts farm and greendales are good examples. • Increase farmers markets • The policy used to be for a 60% requirement and this should be retained. • Requirements have not been enforced. The large number of rural shops (especially selling non-local goods) collectively undermine existing town centres, where rates are paid, overheads are much greater and car parking charges are extortionate. 	<ul style="list-style-type: none"> • Advice from the Economic Development Team at the Council is that the 30 mile radius for products to be sourced from is too wide and, at the periphery of the District, takes in a considerable area outside East Devon. This would disperse the economic benefits that local food and drink production can bring, particularly in the rural areas where 'farm shops' are most prevalent.
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation: This policy was not subject to consultation</p>	<p>Officer commentary in response: None</p>
<p>Sustainability Appraisal</p>	
<p>See Sustainability Appraisal table below.</p>	
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • No specific concerns raised. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • No comments raised
<p>Commentary on policy redrafting for the Publication Plan</p>	
<p>Redrafted policy title:</p> <ul style="list-style-type: none"> • Policy SE 09 – Rural Shops 	

Policy has been rewritten for clarity and, more substantially, the radius for the majority of products not produced on the premises or holding to be sourced from, has reduced to 10 miles. This change was made in consultation with the Council’s Economic Development Team who advise that this radius will maximise opportunities for local businesses to publicise and sell their products to a local market, minimising food/product miles and maximising economic benefits to the local community.

Strategic Policy 60 – Sustainable Tourism

Tourism is a key part of East Devon’s economy and it is important that visitors continue to be drawn by the high quality environment and offered good quality accommodation and services to meet their needs and encourage longer stays. Policy aims to secure a high quality, sustainable tourism experience for the wide range of visitors to East Devon, and ensure that proposals benefit local communities and businesses, whilst conserving, enhancing and promoting the natural beauty, wildlife and cultural heritage of the District.

Key technical evidence sources

Tourism Strategy [Tourism Strategy](#)

Issues and options consultation

See General Issues above.

Draft Plan Consultation

Key issues raised in consultation:

- Devon County Council query how the loss of visitor accommodation policy will be applied to premises only recently begun to be used as visitor accommodation (e.g., Airbnb).
- Definitions are absent. Net Zero - does this mean on site or as part of the total visitor journey? (Exeter and Honiton are probably the most sustainable parts of EDDC but probably

Officer commentary in response:

- It is agreed that the policy would benefit from further clarification. It is not the intention of policy to prevent the development of hotels or prevent the provision of any new facilities or attractions, instead it is intended that they be located in more sustainable locations where reliance on the private car is reduced and environmental impact is minimised.
- The Policy has been rewritten in light of the responses received.

not what is meant by this policy). Improvements in public transport to access some areas would be required. How would it be achieved?

- Sidmouth TC - We welcome the proposed measures in the draft Local Plan relating to the change of use from hotels and guest houses. However, the serviced holiday accommodation sector is so important to the economy of Sidmouth that we would like to see these provisions strengthened so that change of use becomes a very last resort.
- Coast Meets Country Project - Response to Local Plan Consultation sets out a number of initiatives that the group are pursuing/supporting. It has not been possible to summarise this response here and so the representation should be read in full.
- If the sustainable tourism policy was applied 100%. then there would be no new tourist facilities.
- Support diversification of farms by providing tourist accommodation.
- Support protection of the AONB's by restricting further tourism development.
- Caravan sites such as Devon Cliffs are not sustainable due to their sheer volume and the increase stress on our local sewage works, infrastructure and Jurassic coastline.
- Discouraging hotels will increase second homes, Air BnB's etc to the detriment of local communities. Local communities will be 'hollowed out'
- The strangulation of the hotel industry across the district is very bad news for the wider economy and jobs, and has certainly undermined our town centres.

- It is now split into sections so that it is clear which criteria and requirements apply to each development type. Development in the countryside will be subject to more restrictive requirements given the potential for environmental harm and need to minimise reliance on private transport in more rural areas.
- Loss of existing tourist accommodation and loss of dwellings to short term holiday lets are dealt with in clear sections.

- The normal traffic access and visibility issues are dealt with adequately by normal planning policy and a specifically anti-car provision is not required in the Local Plan.
- Support retention of holiday accommodation, and especially hotels, but enforcement is needed to resist their loss. DM team need to apply the policy.
- Policy does not explain the anti-car and anti-hotel stance. Anti-car would seem to exclude towing caravans or anyone wishing to holiday in the more rural parts of the District...
- The Tourism Strategy is long on hyperbole and well-meaning policy statements, but has no practical proposals to improve the tourism offer.
- Caravans and campsites are encouraged (despite unsightly toilet blocks, shops etc) but not quality hotel accommodation.
- Disappointing that there is no appetite for encouraging cycling and walking by the signing of suitable routes. Need to capitalise on South west coast path.
- The East Devon AONB team welcome the inclusion of advice about the sensitive nature and importance of the AONB with restrictions on the erection of new buildings.
- Otter Valley Association are concerned that increasing year round tourism could harm the outstanding natural environment which draws tourists
- Sidmouth Arboretum suggest that the policy would be stronger if there was a specific mention of the mature trees and hedgerows that typify the surrounding natural environment of most of rural East Devon.
- Agents for Bourne Leisure advise that they endorses draft Policy 60 in principle, and welcomes the Council's strategic vision for tourism, "that East Devon be the leading, year-

<p>round tourism destination in Devon”. The tourism sector is a significant economic driver for the area, and it is crucial that the Plan is supportive of investment and growth of the industry, with a positive approach to sustainable tourism development during the plan period.</p>	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation: This policy was not subject of that consultation</p>	<p>Officer commentary in response: None</p>
<p>Sustainability Appraisal</p>	
<p>See Sustainability Appraisal table below.</p>	
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> No specific concerns raised. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> No comments raised other than to note that assessment work advises <i>“There could be risks associated with tourism growth e.g. with respect to water quality or recreation. Policy however sets no quantum of growth or specific locations.”</i>
<p>Commentary on policy redrafting for the Publication Plan</p>	
<p>Redrafted policy title:</p> <ul style="list-style-type: none"> Policy SE 10 – Sustainable Tourism 	
<p>The Policy has been redrafted to simplify it and add clarity. An additional section has been added to resist the loss of dwellings to long term holiday lets.</p>	

Strategic Policy 61 – Holiday Accommodation Parks in Designated Landscapes	
<p>This policy specifically concerns holiday accommodation parks, comprising static caravans, chalets and/or lodges and associated facilities, which are located within the designated landscapes of the District. Holiday accommodation parks are a key feature within the tourism sector and their improvement will have a positive effect on the economy of East Devon. This should not, however, be to the detriment of the natural environment or local communities and so a policy is required to establish how applications will be determined. This is particularly important given the large scale, range of facilities, lengthy operational hours and prominent coastal locations of many existing parks and their detrimental impact on both the seascape and the landscape.</p>	
Key technical evidence sources	
<p>The Tourism Strategy Tourism Strategy</p>	
Issues and options consultation	
<p>See general Issues above.</p>	
Draft Plan Consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Strongly support policy of not allowing new or expanded large holiday parks in sensitive coastal landscapes. • Improvements to existing sites should be achieved through use of darker shade units and landscaping and increased tent provision as this is more affordable and lower impact on the landscape. • The existing policy has not worked as existing large sites have continued to expand. • Caravan parks have become too large causing visual harm in some cases. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • The support for this policy is welcomed and noted. • Given that these holiday accommodation parks already exist, it is considered that policy should be amended to achieve a balance between the business need to continue to upgrade and improve the offer to tourists and the need to protect the designated landscapes in which they are located. To this end policy will continue to resist expansion or intensification but should be amended to enable accommodation on existing pitches to be upgraded and improved provided this will not result in an increase in size and height and will result in an environmental benefit.

<ul style="list-style-type: none"> • Existing sites have badly impacted the World Heritage Site and AONB, they should not be allowed to increase further. • Why caravan parks allowed and hotels are precluded. • The East Devon AONB team support the advice and justification relating to designated landscapes • Devon Wildlife Trust advise that they would like to see the policy reworded to include for the requirement to deliver a minimum 25% biodiversity net gain to account for the impacts on these sensitive landscapes. • Agents for Bourne Leisure object to policy they consider it unduly onerous and unreasonably restrictive for existing holiday parks, particularly, as the supporting text states, considering that “the majority of East Devon lies within one or more designated landscapes”. They consider the needs of the tourism sector and demands of tourists are continually changing, and it is important to cater for and adapt to these needs and demands in order to continue to attract visitors, increase the level of expenditure and support local jobs. Continual investment in holiday park accommodation and facilities is therefore required to attract new and repeat visitors and policy is far too restrictive. 	
Supplementary Regulation 18 consultation Spring 2024	
Key issues raised in consultation: This was not subject to consultation	Officer commentary in response: <ul style="list-style-type: none"> • None
Sustainability Appraisal	
See Sustainability Appraisal table below.	

Habitat Regulations Assessment	
Key issues raised in consultation: <ul style="list-style-type: none"> No specific concerns raised. 	Officer commentary in response: <ul style="list-style-type: none"> No comments raised other than to note that assessment work advises <i>“There could be risks associated with tourism growth e.g. with respect to water quality or recreation. Policy however sets no quantum of growth or specific locations.”</i>
Commentary on policy redrafting for the Publication Plan	
Redrafted policy title: <ul style="list-style-type: none"> Strategic Policy SE 11 – Holiday Accommodation Parks in designated landscapes. 	
The policy has been slightly amended to permit upgraded accommodation of a similar size and height to replace existing permanent accommodation where it will result in an environmental benefit. This ensures that businesses can improve their tourist offer in designated landscapes without increasing their site area or the impact of development	

Policy omissions from Chapter 9	
This section seeks to identify any policy areas that have been omitted from this chapter.	
Key technical evidence sources	
The key evidence which has informed this Chapter is the Economic Development Needs Assessment Economic Development Needs Assessment (January 2023) which establishes the need for different types of employment land up to 2040, identifies some broad locations and assesses the level of supply at the tie of the study.	

<p>Other evidence of note is the Council’s Economic Development Strategy Economic Development Strategy, the Economic Review Local Economic Review, the Employment Land Review Employment Land Review, the Tourism Strategy Tourism Strategy and the Clean Growth Vision Clean Growth Vision</p>	
<p>Issues and options consultation</p>	
<p>See General issues above.</p>	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Are the economic development/employment policies intended to apply to agricultural development? The criteria do not seem to be a good fit, but there does not appear to be a separate specific policy for agricultural buildings and other development such as slurry lagoons. It is considered to be a significant omission if there is no policy to deal with such development which can have consideration impacts on the landscape and environment of the rural parts of the district, particularly the AONBs. • No mention of promoting the agricultural/horticultural sector or supporting young people to continue working and living on farms. • Tourism is vital for the area, but we do not want second homes. Sustainable and green tourism is good. Sites like Devon Cliffs are not. • Retail and produce must be sustainable and where possible be locally produced and made. Independent shops and farm shops are a good example. • AONB must be protected. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Agricultural development would be considered against other policies in the plan, for example those covering countryside development and landscape. The Rural Diversification policy allows farms to expand into other income generating activities in order to support their agricultural activity. • Sustainable tourism and local/farm shops are covered by policies in this chapter. • AONB’s are protected under policies in the landscape chapter. • This Chapter does not seek to identify employment allocations, instead they will be considered through the HELAA process (and both of the sites mentioned here have been considered through that process).

<ul style="list-style-type: none"> • Hill Pond, adjacent to Hill Barton Business Park should be allocated as an employment site. It is within single ownership, is available for development now and could be delivered quickly; It is an infill/rounding off site. The road to the west and north of the site would mark a clearly defined boundary to the employment development in this location; It is not within any protective designation related to landscape character and any development would be viewed in the context Hill Barton Business Park to the east and Yeo Business Park to the north and, when built out, the employment development immediately to the south; There is an existing access to the site via Axehayes Lane, which has direct access to and from the A3052. There is potential to form a pedestrian connection to the footway network within Hill Barton Business Park • Support is given for allocating Land to the East of Liverton Business Park (Exmo 18). This is proposed for three hectares of employment use. This allocation will help the Estate to continue to deliver new jobs through its existing development of the Estate’s adjacent Business Park. Notwithstanding our concerns, set out above, about the lack of settled evidence on the overall form of employment need, the location of Exmo 18 alongside existing and successful employment uses and its site adjacent to the most important town in the District strongly suggests that development of this land for employment can make an important contribution to the District’s economy. 	
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Supplementary Regulation 18 consultation Spring 2024

<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • None 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> •
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Sustainability Appraisal	
See Sustainability Appraisal table below.	
Habitat Regulations Assessment	
Key issues raised in consultation: <ul style="list-style-type: none"> No specific concerns raised. 	Officer commentary in response: <ul style="list-style-type: none"> No comments raised
Commentary on policy redrafting for the Publication Plan	
Insert succinct summary commentary here on how, taking all of the above into account, this policy has been redrafted and why etc.	

Sustainability Appraisal	
Policy number/title: <ul style="list-style-type: none"> 51. Policy – Employment development within existing settlement boundaries 52. Policy – Employment development in the countryside 53. Policy – Farm diversification 54. Policy – Resisting the loss of Employment sites 55. Policy – Employment and skills statements 56. Policy – Town centre hierarchy, sequential approach and impact assessment 57. Policy – Town centre development 58. Policy – Local shops and services 59. Policy – Rural shops 60. Policy – Sustainable tourism 61. Policy – Holiday accommodation parks in designated landscapes 	
Outcome of sustainability appraisal:	Officer commentary in response:

Preferred alternative: Policies 51 - 61

Reasons for alternatives being preferred or rejected:

- The preferred policies 51 – 61 are likely to have major positive effects by fostering a strong and entrepreneurial economy, increase access to high quality skills training, improve job opportunities and greater productivity. Policies will support the vitality and viability of town centres, will ensure good access to services and facilities, and good connectivity. The few negative effects can be effectively mitigated.
- 51A. Allow other job generating uses on existing employment sites (other than use E(g), B2 or B8) – this would provide more choice and flexibility for other employment uses, but reduce the availability of land and premises for uses E(g), B2 or B8. In addition, it could increase site values and rentals from higher value uses such as retail, making it more difficult for traditional and transformational business uses to find suitable sites for start-up or expansion. For these reasons, the positive effects are lower than the preferred policy, and this alternative is rejected.
- 53A. Restrict farm diversification to more limited uses and smaller scale development – this will have positive environmental effects by reducing the impact of farm diversification on the natural environment. However, it will reduce the economic viability of farm holdings and reduce the number of jobs in rural areas. The likely adverse impacts on the local economy and rural prosperity mean this alternative is rejected.
- 54A. Taking a less restrictive approach by allowing employment sites to be available for other uses – this would result in a

- The policy approach is supported as having major positive effects and encouraging development in locations which will promote settlement self containment whilst reducing the need to travel and minimising impacts on features of acknowledged importance such as heritage, ecology and landscape.

positive effects on housing as it would increase the level of housing supply, but will have negative effects associated with the loss of employment sites, and is therefore rejected.

- 55A. Do not include a policy requiring employment and skills statements – this is rejected as it would provide less opportunity to access high quality skills training, limiting the positive effects on objective 11.
- 58A. Do not include a policy that resists the loss of local shops and services – this would rely on national policy to avoid the unnecessary loss of facilities, but the lack of a Local Plan policy would mean greater uncertainty and more potential for facilities to be lost to higher value uses. Therefore, the negative effects on objective 10 mean this alternative is rejected.
- 59A. Do not include a policy that addresses rural shops – without such a policy, shops in rural areas could sell a range of goods that could compete with, and affect the vitality and viability of, local centres, leading to negative effects on objective 12. It would also mean less support for local food and goods, with consequent increase in carbon emissions from travel as produce is sourced from further away. Therefore, this alternative is rejected.
- 60A. Do not include a policy to address sustainable tourism – this was rejected as it would likely mean less economic benefits (objective 11) through the lack of supporting policy for sustainable tourism, and potential for negative environmental effects through a lack of clarity on the balance between protecting the natural environment and encouraging visitors.
- 61A. Include a less restrictive criteria-based policy which permits extensions to existing holiday parks and establishment of new

<p>parks – the high landscape quality of East Devon means that permanent structures associated with new or extended holiday parks are likely to cause considerable harm, given the scale and range of facilities associated with such parks. Although this alternative could have positive economic benefits (objective 11), the major negative landscape effects (objective 2) mean that it is rejected.</p>	
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10 Conclusions

10.1 This paper provides an assessment of policy matters that have informed redrafting of chapter 9 of the local plan in respect of policies relating to economic considerations. At this stage of plan making, recommendations on a first redraft of plan policy for Strategic Planning Committee for October 2024 meetings, no significant or substantive policy changes are recommended.

10.2 The redrafted policies have, however, been generally tightened-up to provide greater clarity in respect of appropriate locations for new developments.

10.3 Chapter 9 of the plan (as maybe renumbered if other plan changes occur) will be subject to refinement through the committee process, and any possible subsequent redrafting, and will be considered again at Committee later this year.