

Report to: **Strategic Planning Committee**



Date of Meeting: 29 October 2024

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

East Devon Local Plan – allocation site selections

Report summary:

This report seeks agreement on the sites to be included in the Regulation 19 draft of the local plan, subject to any final technical assessment work to be completed. The local plan will need to set out how projected development arising from plan policy will meet minimum housing development numbers set out by Government for East Devon. Whilst we can count existing dwellings built from 2020 to 2024 in this work, as well as commitments in the form of sites with permissions, and add in an element of windfalls, it will be essential for the local plan to allocate sufficient sites, with confidence of delivery demonstrated, to ensure Government requirements for development are met. Specific attention is applied to housing development but also the report addresses employment allocations as well.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

1. That members consider the options set out in paragraph 2.3 of this report for calculating future housing needs, noting the risks identified with each option, and agree that the housing needs be calculated based on option B as set out in the report.
2. That committee agree to allocate in the Regulation 19 version of the Local plan the sites recommended in the table included within this report for allocation.
3. That Members agree not to allocate the sites listed in Appendix 2 of this report.

Reason for recommendation:

To progress with the local plan we need to allocate appropriate land for development. The recommendation seeks to ensure this will happen.

Officer: Ed Freeman – Assistant Director, Planning Strategy and Development Management,
e-mail – efreeman@eastdevon.gov.uk, Tel 01395 517519

Portfolio(s) (check which apply):

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

Equalities impact Low Impact

Climate change Low Impact

Risk: High Risk; The local plan needs show how Government housing requirements will be met. If the plan does not include sufficient housing development there is a likely expectation that it will fail at Examination or the Examination process will be paused by the appointed planning inspector/s with instruction to find more sites/scope for housing development. Whilst pausing of Examinations was relatively common in the past the Planning Inspectorate has been instructed by Government to be less pragmatic in the future and be more ready to fail plans rather than allow for protracted and lengthy examinations, involving substantive additional work, at and through the examination process. We would also highlight that risks remain in respect of when a new NPPF may be published, what it may say, specifically including in respect of housing numbers, and what sort of timetables for plan making work it may establish or demand. These remain unknowns.

Links to background information

Links to background documents are contained in the body of this report.

Link to Council Plan

Priorities (check which apply)

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

1. Introduction

- 1.1 This report sets out options for site allocations in the new local plan so that appropriate new housing provision will be made in the plan to meet, as a minimum, the required housing numbers set by Government. We are, however, working to housing numbers referred to in consultation material issued by the Government in July 2024 and do not know when the Government may issue the next draft of the NPPF and any associated housing number requirements. We are progressing on the basis of consultation draft materials and transitional arrangements set out within them giving 1 month from the publication draft of the new NPPF to progress to the Regulation 19 stage of plan production (i.e. the point at which engagement starts). This enables a plan to progress

under the December 2023 NPPF and a reduced housing requirement figure. For more information see officer report to committee in August 2024 - New NPPF 2024 Report.pdf (eastdevon.gov.uk)

2. The housing requirements for East Devon

- 2.1 On the 3 September 2024 this committee received a report setting out the housing requirements for the local plan for the plan period, now agreed to cover the period from 1 April 2024 to 31 March 2042, a period of 18 years. The report can be seen at [1. Housing requirement report.pdf \(eastdevon.gov.uk\)](#) This committee report does not revisit the detailed commentary set out in this previous report but it does reference headline considerations and updates on work on housing numbers assessment.
- 2.2 From the 3 September report it is highlighted that, under consultation draft of changes to the NPPF (consultation ran from July to October 2024), the Council can plan for development of 946 homes per a year. This figure would be allowed for under the draft wording, but it is stressed that it is 200 dwellings per year less than the new (proposed) standard housing methodology generates. There is an unknown about what the final NPPF may say, when it may be published and what time scales it may set for Local Plans to reach the Regulation 19 stage (formal consultation to start). There is also uncertainty over whether this 946 dwellings per year, allowed for under the consultation, will remain allowable. But as things stand we are working on the basis of what the consultation draft material set out.
- 2.3 In terms of how we calculate future housing needs and what the plan should provide for there are variations on how we can view overall numbers, these are summarised below:
- a) To date we have worked on the basis that the plan runs for 22 years (2020 to 2042) and using Government draft consultation figures we should be accommodating 946 dwellings for each of these years. Overall this generates a total housing requirement figure of 20,182. But we have and do recommend a 10% buffer and if added this to the full 22 years generates a total figure of 22,893. This approach generates the higher of the options suggested, though we have had plan representations that advise we should seek to accommodate more housing (and some say we should plan for less). **Under this approach we plan for 22,893 houses in a plan period running from 2020 to 2042.**
 - b) There is, however, a variation on the above that is built around the fact that we have already accommodated 3,539 houses in the period of 2020 to 2024. The point about adding a buffer is that it takes into account the possibility that some houses may not be built, but as these 2020 to 2024 houses have already been built (they exist) there is a case that the buffer for them is irrelevant and should not be applied (i.e. the buffer should be about future predictions, not about actual development to date). If we apply the buffer to projections only, i.e. from 2024 (this year) though to 2042 – we would be applying the 10% buffer to a figure of 17,273 new homes (the maths being – total houses at 20,182 minus

the 3,539 giving the figure of 17,273). Applying the 10% to this projected need only (i.e. not what has already been built) generates a future need figure of 19,000 and to this we add back in the 3,539 houses already built, it generates a total of 22,539 houses. This approach would appear reasonable and logical and generates a final outcome that is 354 dwellings lower than option a), we could however expect the approach to come under challenge. Some may argue it runs counter to Government policy of seeking to boost supply and that for reasons of consistency across the whole plan period the buffer should apply for all years. **Under this approach we plan for 22,539 houses in a plan period running from 2020 to 2042. It is suggested by officers that this is the favoured approach to follow.**

- c) As a variation on options a) and b) above we could take the view that we should not be applying the 946 need figure per year to the years of the plan that run from 2020 to 2024. The case could be argued that because the 946 figure was introduced in 2024 then prior to this date we should use the housing figure that previous applied, which was lower, at 893. We do not spell out the mathematics of calculation rerunning, but the conclusions are:
- Option c) rerunning the option a) basic approach above (i.e. adding the buffer for all of 2020 to 2042) – **generates a need to plan for 22,600 new homes from 2020 to 2042.**
 - Option c) rerunning the option b) approach (i.e. **not** applying the buffer for 2020 to 2024) – **generates a need to plan for 22,303 new homes from 2020 to 2042.**

We would, however, regard either of the above approaches as vulnerable to challenge (truth be told whatever we do/say we can expect to be challenged). We are not aware of national planning guidance that says this type of approach is not legitimate, but by the same token we are not aware of guidance that says it is. It is also highlighted that the 893 only applied for last year and for the years before that there was a higher figure. So, in a real sense by just using a figure of 893 we would arguably be undermining our own argument.

- d) A final variant we highlight is that we discount the period of 2020 to 2024 from the local plan and that we rebase the plan to a new start date of 1 April 2024. Under this approach we would take a forward-looking approach only and we would discount the period of 2020 to 2024 and the 3,539 houses from our calculations. This approach would, if proven to be robust, result in needing to accommodate 18,731 new homes from 2024 to 2042. In comparison with all of the above options it would result in lower numbers of houses to allocate for development (the lower numbers being, in variant order above, lower figures of 623, 269, 330 and 33). This approach, however, has more considerable risks. The evidence base we have for the plan typically runs from a 2020 base date and there are technical challenges associated with trying to manipulate it to a new start date. Furthermore we would invariably come under challenge around 'cutting our data' in means that are viewed as being designed to lower housing numbers. Especially so in the context of Government guidance that expresses the need to boost supply. There are though cases where plan start dates have

been amended in plan preparation and we know of no Government policy that says it can't be done.

- 2.4 It should be noted that the 10% buffer figure is quite widely used by planning authorities in local plans but it is a figure that we can also be expected to be challenged on. This would be by the development industry through Examination with the case being made that it is too low. Conversely some representors might make a case that it is too high. There is no explicit guidance or instruction on buffers to apply but anyone making a case that it is too low may choose to challenge confidence around delivery rates and start dates on some sites. We can expect to be challenged on when the new community, in particular, will start seeing houses built and how many may be built each year. But also other matters such as impacts of delivering nutrient neutrality could be raised.
- 2.5 In respect to housing numbers there is also some scope to move on from standard density assumptions in respect of some sites and final plan allocations. To date we have typically applied standardised density assumptions in respect to site capacity work. However, through finer grained assessment, in selected cases, it may be that some sites could have capacity to accommodate higher housing numbers than original assessment may have suggested. Though we would suggest such scope is comparatively limited and as such even with this work major changes should not be expected to occur

3. Consideration of sites to allocate in the plan to date

- 3.1 Strategic Planning Committee has met on five occasions, in September and October 2024 to consider sites to allocate for development in the local plan (for housing and employment – employment matters are addressed in more detail further on this report) - see: [Browse meetings - Strategic Planning Committee - East Devon](#)
- 3.2 At these committee meetings it was resolved to allocate a number of sites for development in the local plan, though on some sites, including some recommended for allocation by officers, and many not recommend by officers, the resolution was to 'move-on'. This 'move-on' status being one noting that sites may need to be revisited as being allocations options to potentially be reconsidered at a later date.
- 3.3 Based on the sites that committee did resolve to allocate, albeit noting that there is the need for further site capacity and delivery assessment to be undertaken, we can generate the following table of housing supply. Based on an assumption of planning for 22,539 dwellings (option b) as suggested by officers above) for the 2020 to 2042 period.

Housing requirement 2020 to 2042 – including 10% headroom (see option b) reference for headroom methodology	22,539
Minus Completions 2020 to 2024	3,539
Minus Commitments (sites with permission and Cranbrook Plan allocations)	7,578
Minus Future windfall projections 2024 to 2042	1,946
Minus Agreed allocations to date (though also adjusted to discount any recommended allocations in the table that follows – see note below)	6,902
Homes planned to accommodate to date	20,261
Shortfall in homes we need to allocate for (the requirement minus homes planned)	2,278

Agreed allocations commentary – sites that have been agreed to allocate to date provide for 7,441 dwellings. However, in the table of sites that follows later in this report we are bringing a small number back to committee with minor variations on numbers or further commentary–. To avoid double counting we have deducted 267 from the total which leaves 7,174.

- 3.4 The above table illustrates that based on what has been agreed to be allocated to date there is a shortfall of 2,278 dwellings. To progress with the plan it is strongly recommended that provision is made through land allocations to address this shortfall in its entirety.
- 3.5 Further on in this report we set out officer recommendations on sites that we suggest should be allocated for development. If all of the officer recommendations are agreed by committee we would be accommodating 2,455 new dwellings to give a grand total of 22,716. This would give a ‘surplus’ of 177 new homes in theory, however this assumes Members agree all allocations recommended in this report. It also assumes that all of the sites allocated have delivery trajectories within the plan period, however the total quantum of housing currently proposed in Axminster may be in excess of what the market would realistically deliver and this issue requires further investigation prior to the publication of the Regulation 19 version of the plan.
- 3.6 The above completions data has been collated from previous monitoring data within Housing monitoring updates (HMU). As part of the annual HMU, trajectories for the next five years are produced to allow the calculation of the five-year land supply position. However, to inform the LP, trajectories have been developed spanning the whole of the new plan period. To inform the trajectories a developer consultation was completed, the resulting projections have been assessed by planning officers and informs the commitments value above. The windfall value shown above has been calculated using the 2024 HMU data which has dropped from last year’s windfall figure. Calculations will be shown in the upcoming 2024 HMU.
- 3.7 Plans that do not provide for sufficient housing frequently fail at Examination. At the time of drafting this report it was reported in ‘Planning’ that Oxford City Council had been advised by the planning inspectors undertaking their Examination to withdraw their plan (advise to withdraw is tantamount to saying it will fail if you do not do so). Oxford City Council had set out in their plan that a large element of their need would be accommodated beyond the city boundaries. Neighbouring authorities challenged this, ‘Planning’ reported

“Neighbouring councils have disagreed with Oxford Council’s approach. In March last year, South Oxfordshire and Vale of White Horse councils accused the city council of attempting to “export housing development to its rural neighbours”.

In January, a group of planning experts, including former senior planning officers, said the city council should consider withdrawing the local plan over concerns that its use of a housing requirement figure “not far from double” that of the government’s standard method figure would place a “burden” on surrounding districts.

Work on a joint strategic plan for the whole of Oxfordshire, known as the Oxfordshire Plan 2050, was abandoned in August 2022 after the five Oxfordshire authorities - Cherwell District Council, Oxford City Council, South Oxfordshire District Council, Vale of White Horse District Council and West Oxfordshire District Council - that had been working on the plan since 2017 failed to reach an agreement on housing need for the region.

Following this, Oxford Council and Cherwell Council then proceeded to commission a housing and economic needs assessment (HENA). This formed the basis of the housing targets in the city council's submitted plan.

In their report on the draft plan, inspectors Martha Savage and Kevin Ward said that a “fundamental aspect of the HENA, and one which has caused substantial concern, is that it seeks to assess housing needs first of all on an Oxfordshire wide basis, and then sets out a preferred distribution of these needs between the five individual authorities”.

But they added that this was “despite three of the authorities affected not being party to the study and indeed raising serious concerns about its scope”.

- 3.8 It is highlighted that we have received feedback and comment from Torbay Council that they consider that they will not be able to accommodate their housing needs and they have sought help from other Devon local authorities to accommodate a portion of their housing. In representation East Devon District Council has challenged the Torbay position highlighting a lack of evidence to sustain their assertion and also challenging the logic (even if the case were demonstrated) of addressing Torbay need many kilometres/miles away in East Devon. We do highlight the Torbay position because there is a vulnerability in respect of housing numbers planning for in East Devon given what Torbay have said. On a much more localised scale Dorset Council have also challenged on the basis of some Lyme Regis (in Dorset) need being accommodated in East Devon (in Uplyme). We have not received comment from other local authorities on accommodating an element of their needs in East Devon, though we have received representations from some third parties asserting that Exeter cannot meet city needs and as such an element should be accommodated in East Devon.

4. Capacity of site options to accommodate development

- 4.1 In order to provide for sufficient new housing in the local plan members will need to determine sites in this report that should be allocated.
- 4.2 We would highlight that there are options to not meet housing numbers and we highlight these below noting some could be used in combination. But we would caution that each of these options comes with particular ‘health warnings’ and in each case, or in combination, they could result in a plan being found non-sound – i.e. being thrown out and generating the need to start again or at least take several steps backwards. It should be noted that stepping back might result in needing to plan for

very significantly higher housing levels – perhaps 4,400 more new homes over the 2020 to 2024 period than we are currently planned for.

4.3 The options that we highlight are set out below.

- a) **To not meet housing needs** – we could seek to argue they we simply do not have the capacity, and are so heavily constrained, that we cannot meet housing needs and as such a plan that falls short is acceptable in our particular circumstances. But our circumstances are not exceptional and there is a track record of plans failing where this position has been pursued. These issues were considered by the committee at its meeting on the 5th September 2023 (see - Agenda item - Housing Numbers in the East Devon Local Plan - East Devon) and it was resolved not to pursue this argument.
- b) **Seeking help from other local authorities to accommodate some of our housing** – this approach can be followed (it's what Torbay have been seeking to do) but we should not expect any willing volunteers, and it would be very difficult to sustain the robustness of this approach through examination. This approach would also lead to significant delay and make progressing under the likely interim arrangements of the new NPPF impossible. This in itself would lead to a need to plan for 200 additional homes per year with no realistic likelihood that neighbouring authorities would be able or willing to take some of the housing need, never mind the extra requirement that would arise from the delay.
- c) **Identify broad areas for future growth but don't specify actual sites** – the NPPF allows for broad areas for growth to be accommodated without specific sites being allocated, but this is a challenging approach to follow.

A consideration with identifying broad areas of search is that firstly they need to be defined and agreed and make sense, so we could indicate that a given town may take several hundred extra homes in the future but we would need to define why and how and probably to some degree broadly where. This might not be popular or logical. Furthermore, in doing so, it may invite an inspector at Examination to request some degree of clarity around where the provision could be located. As a result, there is potentially little benefit to this approach compared with making allocations.

4.4 Clearly none of the above options are ideal with only option c) presenting a realistic option but even then it is considered much more preferable to identify appropriate allocations to meet the housing need than simply future areas for growth.

5. Sites to be reconsidered as allocations

5.1 Whilst committee members may wish to revisit all or any sites considered at the September and October committee meetings officers have set out criteria that are regarded as sound, logical and robust in order to determine which sites to look at again. It is worth noting that 20 or more hours of committee debating time was spent on sites and a wholesale revisit could be very time consuming and complex and involve reviewing some sites that received very limited or nil positive committee feedback and performed very poorly in terms of technical merit.

5.2 The criteria applied by officers in respect of sites that are scheduled for reconsideration by committee are:

1. Site was recommended for allocation by officers and Members resolved to “move on”
2. Site was specifically requested to come back by Members with further information
3. Further information has been submitted which may materially alter consideration of the site such that it is worth Members reconsidering regardless of whether the officer recommendation has changed
4. Sites that abut or are adjacent to a previously agreed allocation or site proposed for allocation by officers
5. Sites that were previously agreed for allocation but the site area or yield should be reconsidered
6. Sites with no specific constraints but where allocation was not recommended due to concerns about the total quantum of development proposed for allocation in that settlement
7. Sites not recommended for allocation by officers but where discussion at the working group had indicated that the site was considered to be a credible option
8. Sites previously identified as second choice that have not otherwise been considered by the committee
9. Site was submitted late in the process and has not previously been considered by the committee.
10. Sites that were missed or mistakenly sifted out.

5.3 On the basis of the above we return the sites listed in the landscape orientated pages below/over for reconsideration at this committee meeting. These are organised in settlement order with over-arching commentary applicable to the settlement. It should be noted that we are working on the basis that agreed sites to be allocated through committee are now for inclusion in the plan. Appendix 1 to this committee report comprises of the individual sites assessment reports, in respect of the sites scheduled below/over.

5.4 We would highlight that in the table below there are a limited number of additional sites listed and that are assessed. Some came in late plan representations and its appropriate to include them in the overall housing mix and some were previously sifted out but are relevant for reconsideration. Sifting out had, for example, included sites that had a past planning permission but if now expired it is reasonable to consider them again/potentially for uses that were not previously granted consent. Legal advise has been taken on the issue of including them in the Regulation 19 plan sites that have not been consulted on at Regulation 18 stage of plan production. The advice is that while sites should be consulted on prior to inclusion in a Regulation 19 plan, there is nothing preventing inclusion of sites at this stage which after all will still be subject to public consultation. There are cases where this has been done elsewhere and this has not prevented the plan from being found sound albeit it does present potential risks of challenge. Equally there are risks of challenge if new sites are not considered as we are required through the Sustainability Appraisal to consider all reasonable alternatives, and we will not be able to demonstrate that if we do not consider those that have been submitted late. Because there are new sites to be considered, that have not been consulted on so far, the intent is that after the Regulation 19 engagement is concluded paperwork will come back to committee setting out feedback on comments received so that committee can consider what has

been said. Once the plan has been agreed by Strategic Planning Committee, we would plan to seek Council agreement to submit the plan for examination.

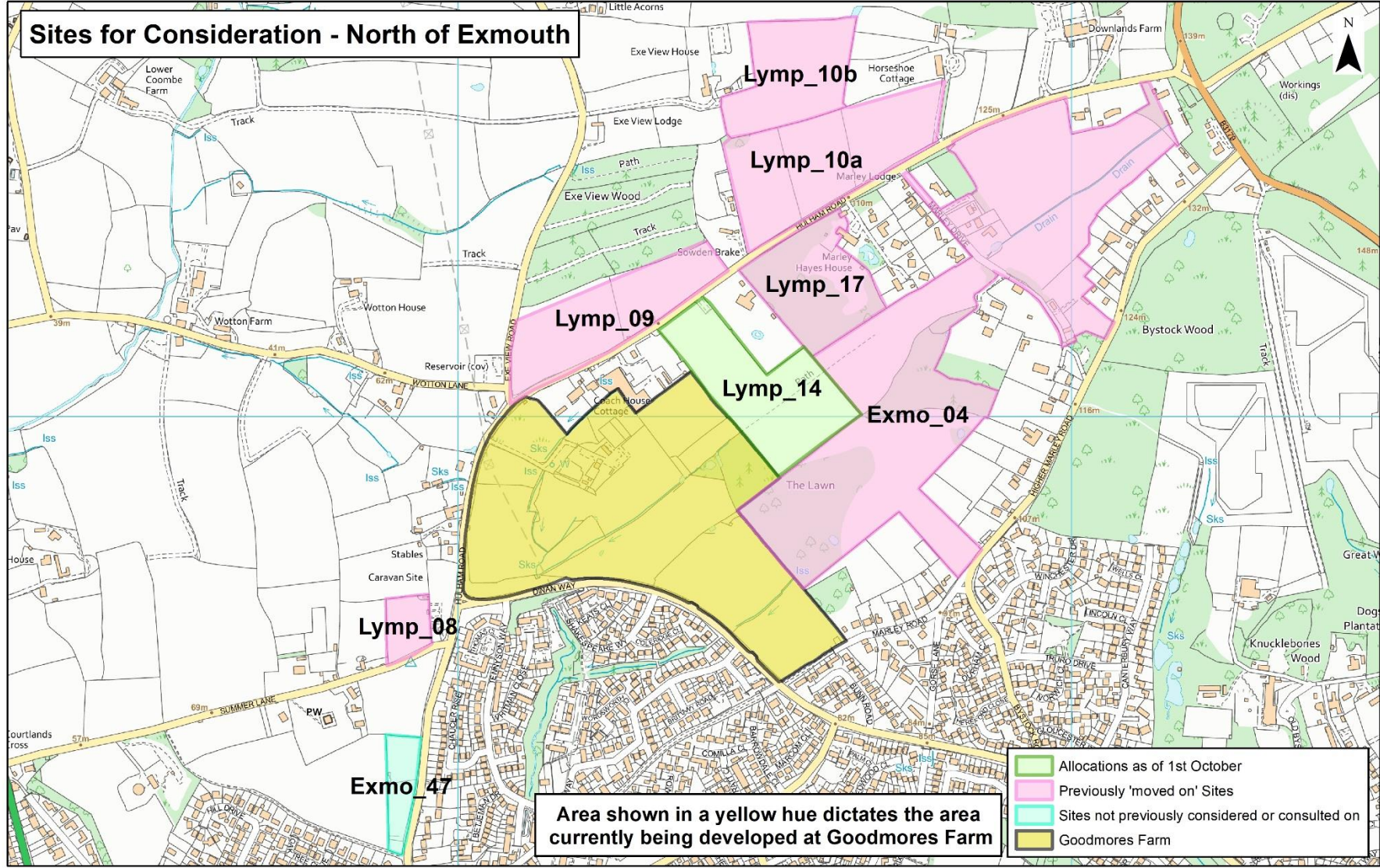
- 5.5 Appendix 2 of this report comprises of all sites that were bought before committee with the exception of those agreed for allocation and those that are highlighted in this committee report. Committee may consider that they wish to revisit any site in Appendix 2 on the basis that it or they could be appropriate for allocation for development.

Sites at and around Exmouth

Exmouth is the only tier 1 settlement in the local plan and as such, in plan strategy terms, it is an appropriate location for higher levels of development. It is the East Devon town with the greatest number of services and facilities. However, in comparison with existing dwellings in/at the town (and population share) the agreed allocations at the town do not provide for proportionately high growth levels. It should be noted that a number of assessed sites are in Lympstone Parish but they abut/are deemed to be 'at' Exmouth in respect of plan policy.

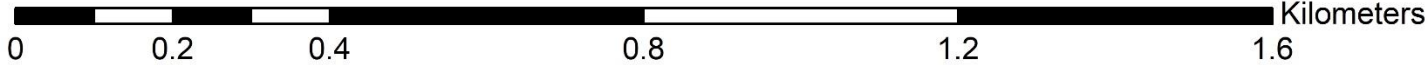
In Exmouth the draft local plan has an allocation on the northern side of the town for a number of adjoining, close by sites – these were – Lymp_09, Lymp_10a, Lymp_14 and Exmo_04. It was proposed under plan policy that a Masterplan should be produced to promote a comprehensive development scheme. A collective approach to securing development would provide means to promote development alongside provision of infrastructure and to manage development in a coherent phased manner. It would also provide opportunities to secure development in a manner that effectively integrates with the Goodmores Farm development to the southwest, noting, for example, that there is provision for a new primary school at Goodmores Farm and provision for employment development. In the plan making work we have done, as set out in the reporting for these sites, we suggest an allocation, in total, for around 263 new homes.

Sites for Consideration - North of Exmouth



Area shown in a yellow hue dictates the area currently being developed at Goodmores Farm

- Allocations as of 1st October
- Previously 'moved on' Sites
- Sites not previously considered or consulted on
- Goodmores Farm



Site Ref	Site address	No of dwgs	Reason No	Commentary on matters raised at committee (in italics) - with summary officer response or reference to stand alone commentary further in this report section	Officer recommends allocating
Lymp_07	Land at Courtlands Cross, Exmouth	100	1	The site, specifically the south easterly two fields that we would envisage allocating for housing development are flat and elevated above and away from direct or potential direct views linking Exmouth and Lympstone, there is visual inter connectivity with parts of the former but not the latter. There is also extensive tree planting to site boundaries, specifically including to the north, that forms a visual boundary as well as a perceptual boundary of separation. Lympstone village centre, with the facilities it offers, lies around 1,200 metres straight line distance from the centre of the site and there is road and footpath access. A range of facilities are also accessible in Exmouth. A regular bus service, running north/south – Exmouth – Exeter, runs along the eastern site boundary.	Yes For 100 new homes
Lymp_08	Land off Summer Lane, Exmouth	14	1	At committee concern was raised in respect of highway access into this site. In the HELAA work appendix-f-ii-2021plus2017-nonstrategic-sites-lympstone-to-stockland-corrected.pdf (eastdevon.gov.uk) Devon County Council advise <i>“Summer Lane is narrow and has no footways and the junctions at both ends are seriously substandard. The site could not realistically be developed without the provision of a new link road between Hulham Road and the A376 Exeter Road. Although the site is on the fringe of the built development, public transport, footway and cycle links are reasonable.”</i> Our understanding is that the new link road is scheduled to be built in the near future. With its construction there may be scope to access the site from the link road or perhaps more suitable would be an access of Summer Lane noting that with relief road construction vehicle flows along Summer Lane will decline as it will no longer be an attractive route for motorists wishing to get from Hulham Road to Exeter Road. It is a recommended site for allocation for development.	Yes For 14 new homes
Exmo_04	Land at Marley Drive, Exmouth	50	1	This site and adjoining sites were recommended for allocation in the local plan. Agents promoting this land have produced the Masterplan below.	Yes For 50 homes



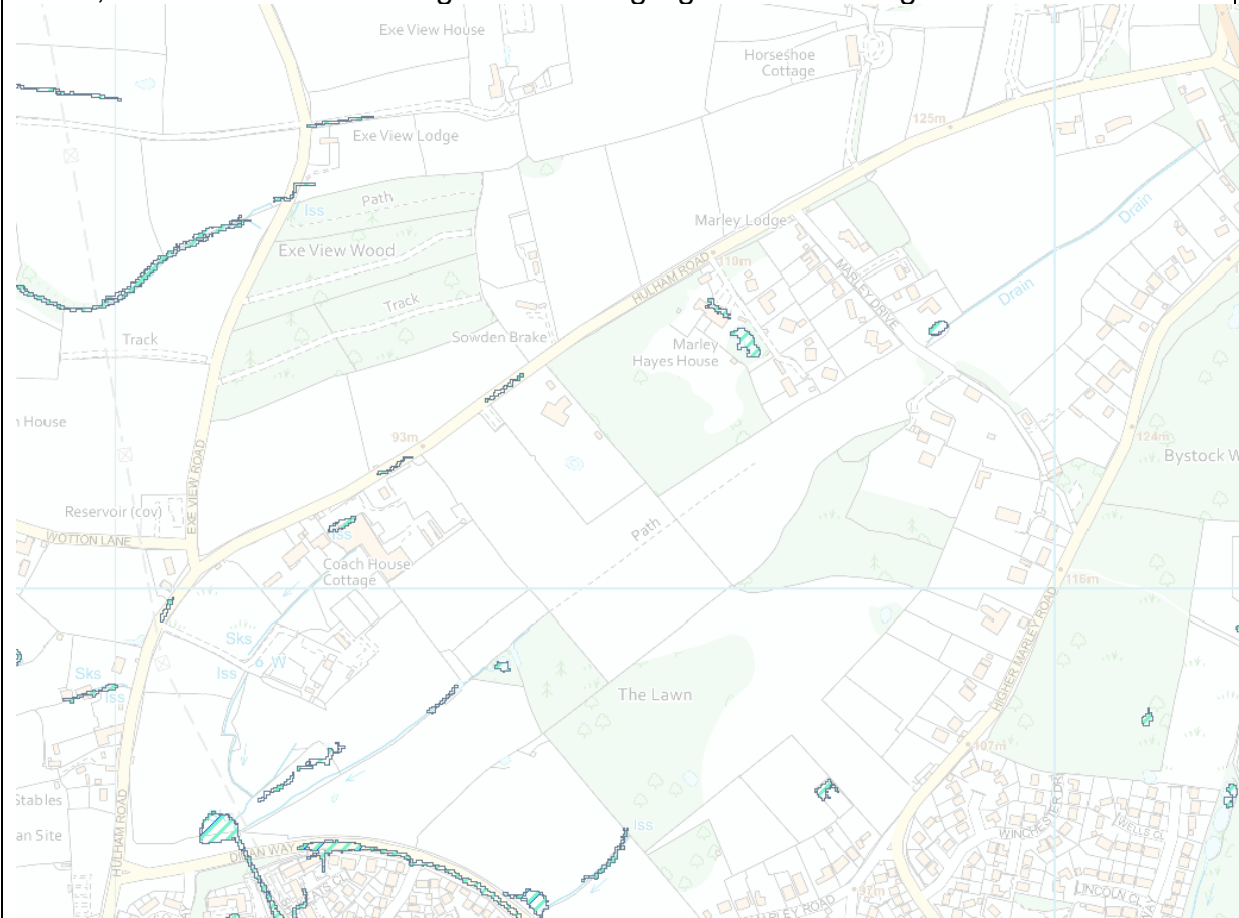
We do not pass comment on this Masterplan, but it does illustrate how site access could be achieved and how a broad distribution of development could be set out on Exmo_04, noting provision of/retention of green spaces. The plan also shows the adjoining site Lymp_15 with an indicative footpath link through to it. However, through more detailed work, in a collective Masterplan for sites on this northern side of Exmouth, vehicular access from Exmou_04 to Lymp_15 could be seen as a desirable option.

Lymp_09	Land fronting Hulham	54	1	This site and closely related land to the east, Lymp_10a, were recommended as allocations for development in the draft local plan. There were concerns raised at Committee around surface water runoff and associated flooding matters. We have	Yes
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Road,
Exmouth

interrogated our records, information supplied by JBA consultants and see no evidence of significant surface water flooding. The map extract below shows, blue areas, where localised flooding has been highlighted as existing.

For 54 new homes



This is not to say that in and after heavy rain roads can be wet and have water on them, but this is common on many roads. There were also concerns raised about highway access to the site/s, footpath access along the site frontage and potential tree loss. Some loss of trees may occur, this might not be avoidable. But this can be kept to a minimum and compensatory planting could form part of future development. Promoters of the sites have produced illustrative material to show how

development could come forward. Whilst not advising that the plan below is a form of development that is endorsed, nor for that matter not endorsed (in this report we make no comment), what we would advise is that it clearly shows an approach that would minimise tree loss and result in footpath access and routes parallel to Hulham Road but set behind the existing trees.

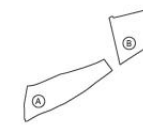


The opport Concept

Draft accommodation schedule
 Total site area: 8.99 ha
 Parcel A western area: 3.69 ha
 Parcel B eastern area: 4.90 ha

Net developable - Parcel A: 1.96 ha
 Parcel B: 2.36 ha

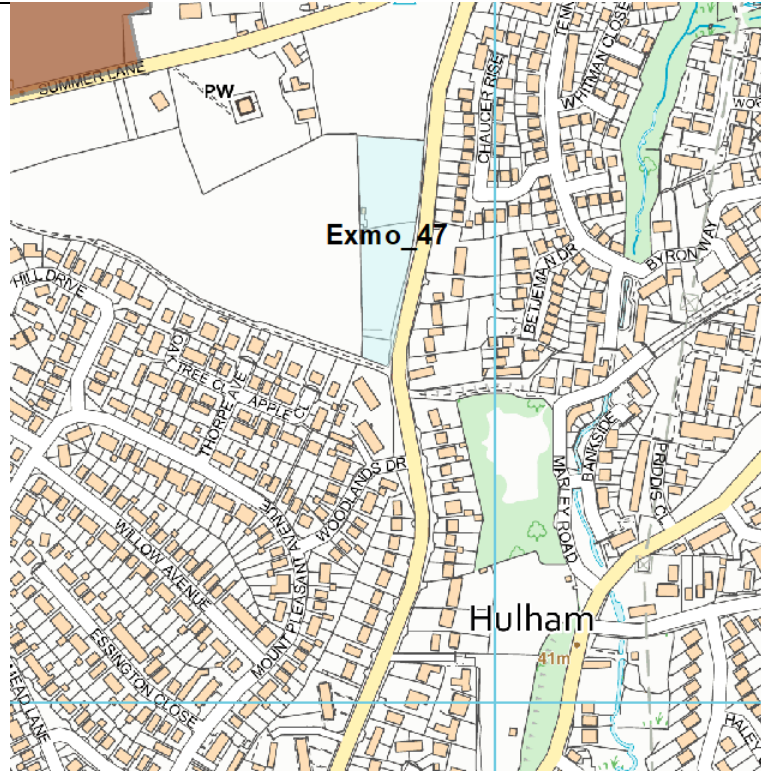
1. Vehicular access from Hulham Road
2. Entrance green space - western
3. Landscape breaks with existing trees and hedgerows retained
4. Lower density development
5. Enhanced footpath network
6. Landscape buffer to Hulham Road including offset to existing trees
7. Ecology area including amenity green space, ecology enhancement and
8. Residential blocks (potential for up to circa 150 new homes)
9. Proposed street planting on key routes
10. Opportunities for play
11. Traffic calming on Hulham Road
12. Second choice allocation
13. Preferred allocation
14. Goodmoors Farm



Key plan - development |

This plan can be usefully read alongside illustrative material shown for site Exmo_04. The land is recommended for allocation. Also, should committee be minded to want to increase development levels land to the north of 10a, denoted as 10b, could be a development option. The indicative site plan illustrates how access could be achieved. It is also useful to consider this site alongside commentary logged against site Exmo_04. Draft plan policy called for a comprehensive development scheme for sites and this is still seen as desirable and appropriate.

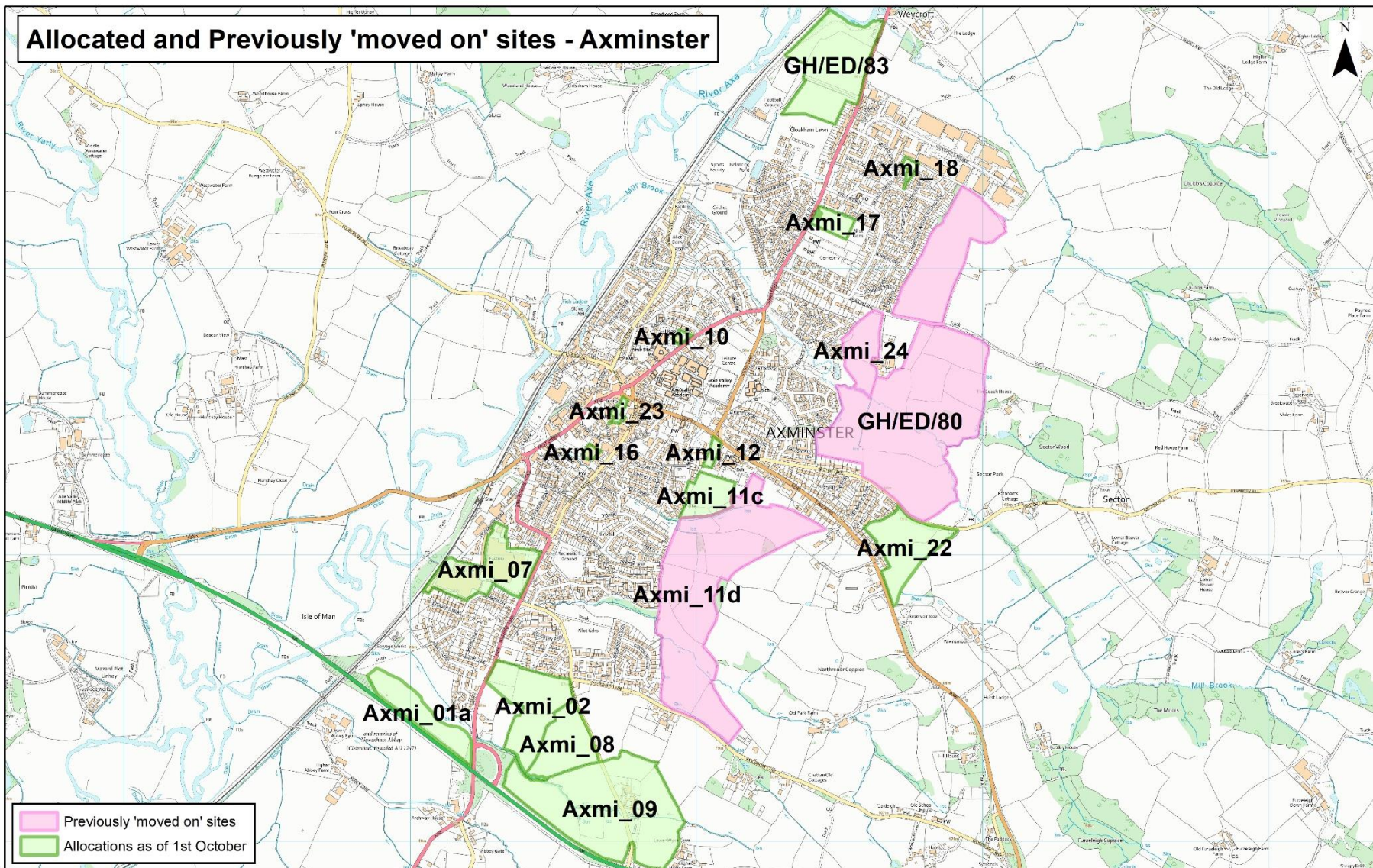
Lymp_10 a	Land off Hulham Road, Exmouth	100	1	See comments applied to this site made in respect of Site Lymp_09 above.	Yes For 100 new homes
Lymp_10 b	Land off Hulham Road, Exmouth	50	4	This site could form a northern expansion to site Lymp_10a. See comments applied to this site made in respect of Site Ly mp_09 above. It should be noted that this site was not originally recommended for allocation by officers. However, it could be seen to offer additional capacity, albeit there is heritage sensitivity with a listed building close to the western boundary of the site.	No
Lymp_17	Land at Marley House, Exmouth	20	4	This site was previously dismissed on biodiversity sensitivity grounds. Its sensitivities remain though it would be surrounded by development should other sites in proximity be allocated for development.	No
Exmo_4 7	Land west of Hulham Road	1	15	<p>We bring this site to committee as it was previously sifted out for consideration on account of falling within and forming part of a Registered Park and Garden, this was taken as an absolute constraint to allocation. However, the extent of the designation has been reviewed by Historic England who issued an advice note dated 19 January 2024 that states,</p> <p><i>“This reassessment considers the fields directly adjacent to Hulham Road, and the appropriateness of their inclusion in the registered area.... The guidance is clear about the inclusion of land being limited to that which has been consciously designed, and our understanding is based on sound evidence that the fields in question were not....</i></p> <p><i>As such, the fields should be removed from the registered area.</i></p> <p><i>After examining all the records and other relevant information and having carefully considered the historic interest of this case, the criteria for registration are fulfilled. The landscape at A la Ronde and Point in View should remain registered at Grade II, but the boundary should be amended on the east”.</i></p> <p>The site no longer forms part of the registered Historic Park and Garden designation and as such this reason for non-designation falls away. The sites itself (now that it is no longer designated) performs reasonably well in assessment and as such it is considered that it would make a good site for allocation for development. Albeit sensitivity in development will be appropriate as the site is of some visual prominence and the northern site boundary abuts the historic park designation. Built development should be concentrated in the southern site part.</p>	Yes For 15 new homes



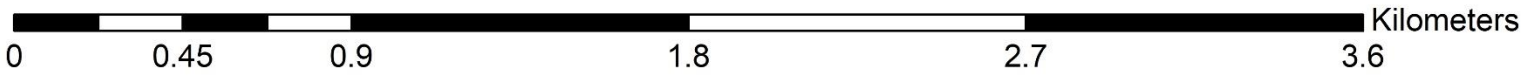
Sites at and around Axminster

Axminster is a Tier 2 settlement in the local plan and as such, in plan strategy terms, it is an appropriate location of higher levels of development. It is, however, one of the smaller Tier 2 settlements and agreed allocations to date would provide for very substantial development at the town in comparison with the existing population size. The scale of growth envisaged is such that limitations on market demand for new homes may see development of allocated sites occurring beyond the 2042 end date of the plan.

Allocated and Previously 'moved on' sites - Axminster



Previously 'moved on' sites
Allocations as of 1st October



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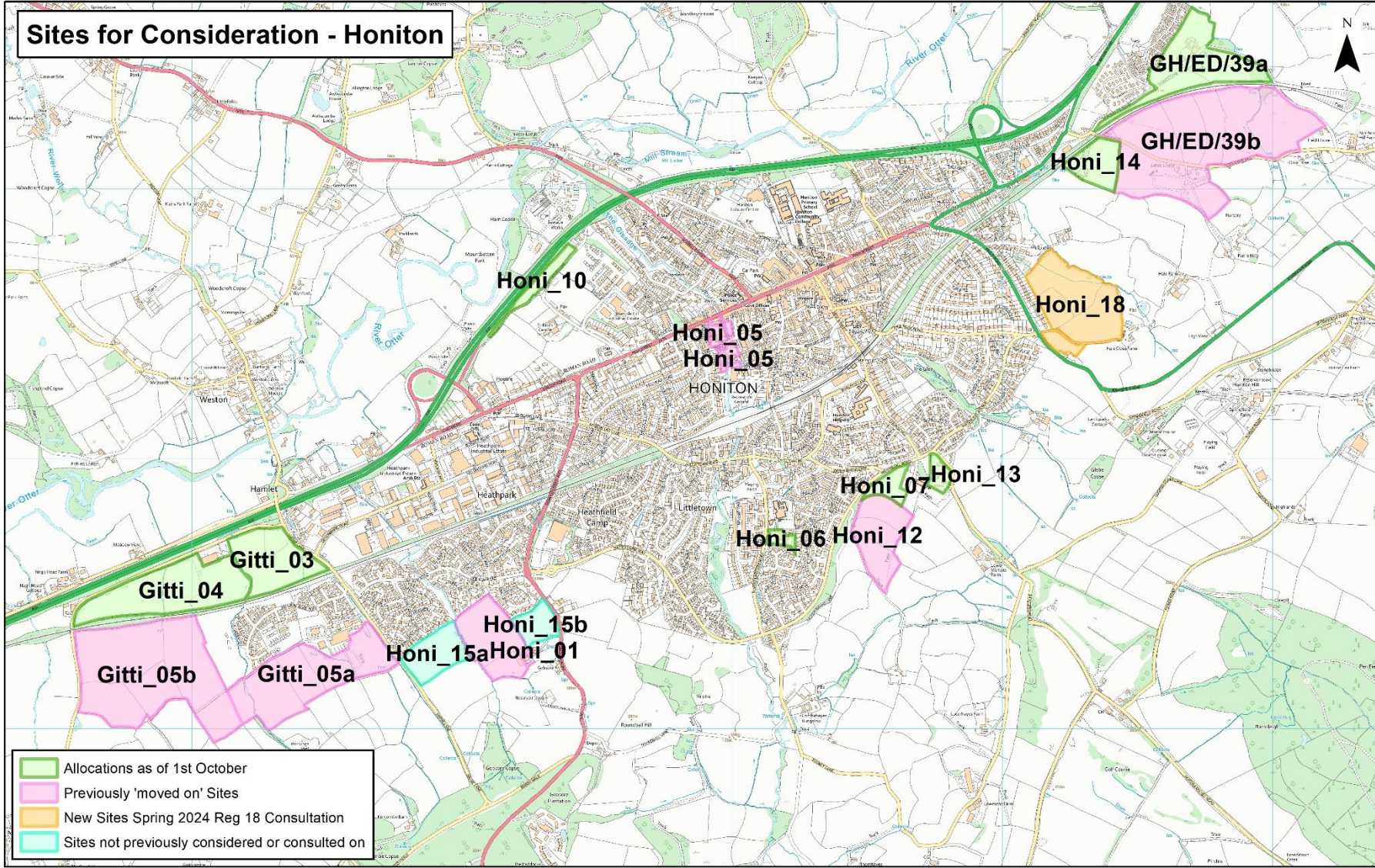
Site Ref	Site address	No of dwgs	Reason No	Commentary on matters raised at committee (in italics) - with summary officer response or reference to stand alone commentary further in this report section	Officer recommends allocating
Axmi_24	Land west of Prestalier Farm, Axminster	29	1, 3	There is a pending application for 29 dwellings on the site (21/3025/MFUL). Devon County Council highways initially had concerns about the application, but following the submission of amended and additional plans plus a Transport Statement, there are no transport/highways objections. The site is considered to be suitable for allocation.	Yes For 29 new homes
Axmi_11d	Land on the south east side of Axminster	331	4	This site adjoins the proposed allocation of Axmi_11c. A slightly larger site, Axmi_11a, was previously included as a second choice site, but the southern and eastern parts of that site are at risk of flooding and would require modelling work to be undertaken to understand the nature and extent of the flood risk. The allocation was therefore reduced in size to avoid the areas at risk of flooding. Consideration could be given to a larger scale of development to include the Axmi_11d, which extends to the south up to Woodbury Lane and the Scheduled Ancient Monument (Roman Fort) and has a potential yield of around 330 homes. However, this part of the site is more sensitive to landscape change than Axmi_11c and therefore less favoured for allocation. Several small watercourses cross the site, and further work would be required to understand the nature and extent of the flood risk. There are other sites around the town where more work has been undertaken to demonstrate the suitability of development and the allocation of more than 300 additional homes in Axminster would increase concerns about whether this scale of development could be delivered during the plan period. Allocation of Axmi_11d is not therefore recommended.	No
GH/ED/80	Prestaller Farm, Axminster	225	1,4	This site adjoins Axmi_22 which was agreed for allocation and also adjoins Axmi_24 (recommended for allocation as set out above). A masterplan has been submitted showing 225 homes on the south of the site with around 20 hectares of multi-functional public and natural open space, which could provide substantial community and environmental benefits. The site forms part of a wider area that was found to be suitable for development as part of the Axminster Masterplan and highway access through Axmi_22 is acceptable to the highway authority. The site is recommended for allocation.	Yes For 225 new homes

Axmi_22	Land east of Axminster	55 but increase to 100	5	It was agreed to allocate for 55 homes based on the standard methodology but there is a current application for 104. The scheme under consideration includes quite a large proportion of smaller homes and it is considered that it would be reasonable to include a higher yield than would normally be justified. The proposed layout (submitted as part of the planning application) includes a road that links into the site under consideration for allocation to the north (GH/ED/80). Recommend that the number of dwellings is increased to 100.	Yes For 100 new homes
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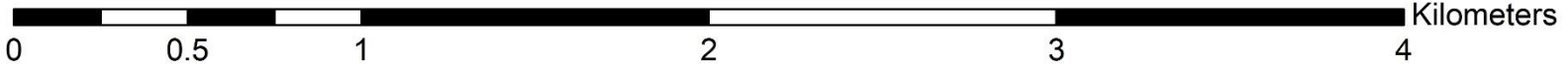
Sites at Honiton


Honiton is a Tier 2 settlement in the local plan and as such, in plan strategy terms, it is an appropriate location of higher levels of development. At present a reasonably large number of sites are proposed as allocations in the town and these would accommodate a reasonable level of development in proportion to the existing size of the town. However, Honiton is very centrally located in East Devon and it does form a focal point with very good transport connections and substantial levels of employment land that could accommodate higher future job numbers.

Sites for Consideration - Honiton



- Allocations as of 1st October
- Previously 'moved on' Sites
- New Sites Spring 2024 Reg 18 Consultation
- Sites not previously considered or consulted on

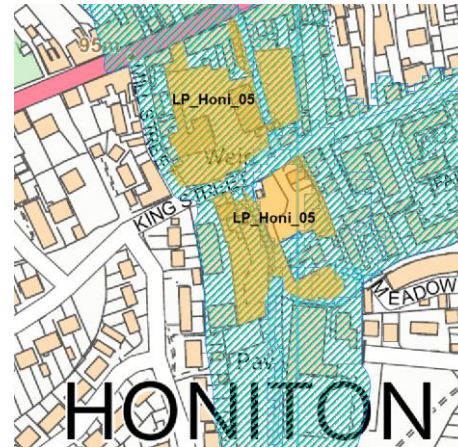


Site Ref	Site address	No of dwgs	Reason No	Commentary on matters raised at committee (in italics) - with summary officer response or reference to stand alone commentary further in this report section	Officer recommends allocating
Gitti_05a and b	Land to west of Hayne Lane, Honiton	310	1, 3	<p>Gitti_03 & 04 – committee endorsed the site allocation as an employment site and for Gitti_05a & b committee agreed to move on and consider both site allocations together. The agent promoting the site has submitted the master plan via Reg.18 Consultation.</p>  <p>The proposal suggested around 310 dwellings across the Gitti_05a & b, including set-back from the National Landscapes area, which would deliver all the development outside the NL. It suggested access via Hayne Lane and the potential secondary access via the existing residential development being built by Baker Estates on an adjoining land area. Development would be in line with DCC highway's comments. The agent suggested potential pedestrian connections under</p>	Yes For 310 new homes

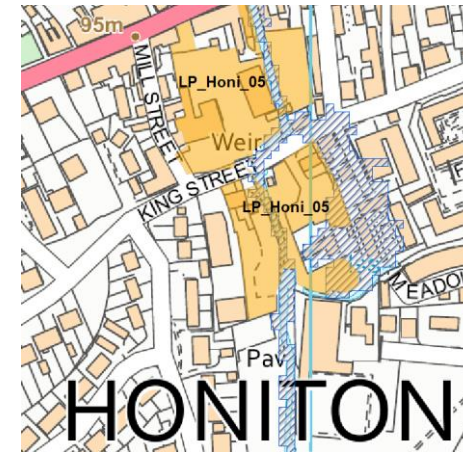
				<p>the railway line, subject to approval by Network Rail, (there is an existing tunnel/culvert that runs under the railway) to improve permeability between the northern and southern development parcels. Whether this is possible or reasonable would require further work. It would be desirable if possible but is not essential to justify land allocation.</p> <p>We would advise that it would be desirable to accommodate a primary school on this site should the extra development be allocated. This would not, however, be a realistic proposition. Honiton already has a surplus of primary school places and the proposed extra housing provision on this site would not be at or close to a scale that would justify new school provision. It would be challenging to be definitive about what facilities a site would deliver but it would be entirely reasonable for plan policy, especially taken in conjunction with development of land to the north of the railway, to seek community building space and potentially retail provision.</p>	
Honi_12	Land to the south east of Cuckoo Down Lane, Honiton	71	2	<p>This land area was identified as a potentially credible site for allocation at Strategic Planning Committee. The site is in the East Devon National Landscape area and is on elevated land to the south of Honiton. The site, if developed in full, would extend the built form of Honiton southward somewhat into currently undeveloped countryside. A public footpath runs alongside the eastern side boundary from which there would be clear visibility of the site. However, despite its elevated position, views for the site more generally would mostly be from longer distance viewpoints with development falling below ridgelines and higher land to the south.. Note that the site has a more detailed overall assessment in the site assessments summary report paperwork appended to this committee report.</p>	<p>Yes</p> <p>For 71 new homes (recommendation notes past committee endorsement)</p>
GH/ED/39b	Land south of Northcote Hill, Honiton	100	4	<p>GH/ED/39 consists of two land parcels. GH/ED/39a lies to the north of the railway and is already accounted for in respect of housing [provision figures. GH/ED/39b lies to the south of the railway line. This site is particularly sensitive in landscape terms, especially more southerly parts that fall on increasingly elevated land. The easterly parts of the site, in particular, are increasingly remote from built up parts of Honiton and site development would extend the town somewhat eastward into the open countryside.</p>	<p>No</p> <p>Noting that GH/ED/39a is already accounted for in housing number assessments.</p>
Honi_15	Land at Heathfield, Honiton	140	2, 9	<p>The site consists of three interconnected agricultural fields, currently undeveloped grassland, located on the southwestern edge of Honiton. The terrain is sloping, rising from north to south. While the northern section has a gentler slope, there are steeper</p>	<p>Yes</p> <p>For 140 new homes</p>

				<p>areas with gradients between 1:10 and 1:3. Due to its elevated position, the site offers open views and is visible from publically accessible areas, including long-distance trails, the A375 Sidmouth Road, and the existing neighbourhood to the north. This visibility is particularly pronounced along the A375 Sidmouth Road, Oak View and Honeysuckle Drive, due to the proximity and relatively low hedges along the southwestern boundary. Views from Hayne Lane and Laurel Road are more limited due to the presence of taller hedges and trees on the site's boundary, and the visual obstruction caused by existing housing developments.</p> <p>Most of the site falls within the designated National Landscape, except the northern edge of the central field. Given its location within this protected area and its high visibility, the site possesses a very high landscape value and is considered to have a medium-to-high landscape sensitivity.</p> <p>However any sensitive development of this site should be seen within the context of an existing built urban edge of Honiton and development would be an expansion outward of this edge, rather than there being standalone development. Any development would need to be carefully undertaken, with a careful landscape sensitive approach, but on this basis it is seen as a credible choice to allocate.</p>	
Honi_18	Land at Kings Road, Hale Close, Honiton	136	9	<p>This site was submitted in the further Reg consultation that concluded early in 2024. It is not recommended to allocate the site due to the significant accessibility issues associated with the proposed junction and access point. The site is currently inaccessible from the National Highway network (as highway authority National Highways have raised objection to the agents suggested highway scheme), there is no evidence to support the feasibility of creating a suitable access at this time. Additionally, the site's development would likely have a moderate-to-high landscape impact due to its proximity and visibility from the National Landscape.</p>	No
Honi_05	Land to the north and south of King Street	40	7	<p>The site is located in an area surrounded by Flood Zones 2 and 3, with only 0.12 hectares of the land falls outside of Flood Zone 2&3.</p> <p>We don't have the Level 2 Strategic Flood Risk Assessment for this site, this would be needed to establish appropriateness for development, noting that it would be a costly exercise to produce this work. The maps below show the extent of flooding concerns. It was previously suggested that delivery of this site could be via a planning application noting that the site falls inside development boundaries of</p>	No

Honiton. There is, therefore, the option for a site owner/agent to submit an application though they would need to support this with relevant flood assessment. Its relevant to note that use for housing would result in loss of employment uses and this would be a relevant consideration in determining any application.



Map shows Flood zone 2 & 3

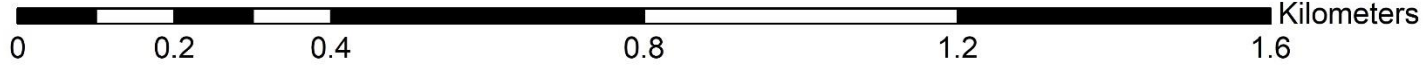
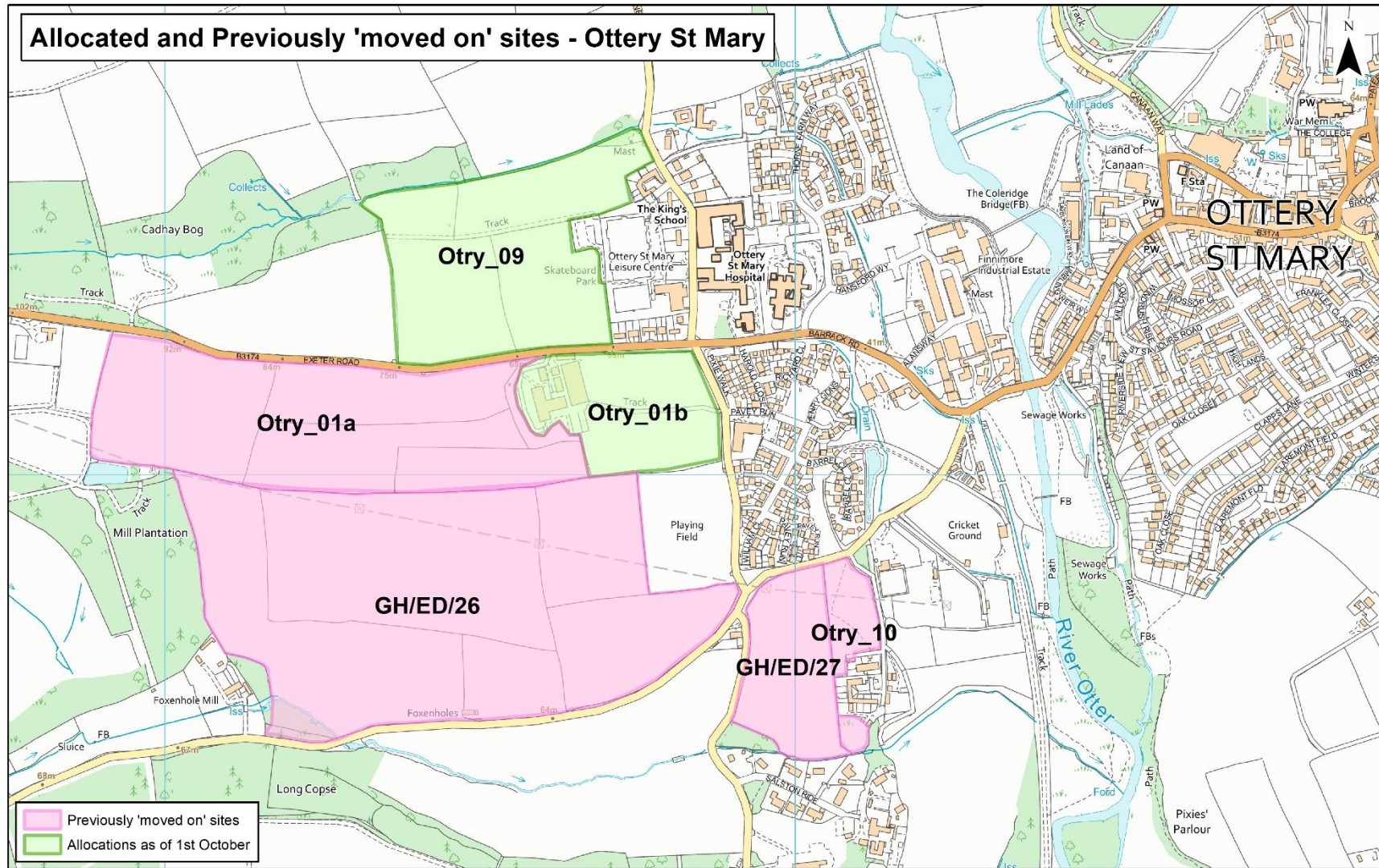



Map shows Flood zone 3 only

Sites at and around Ottery St Mary

Ottery St Mary is a Tier 2 settlement in the local plan and as such, in plan strategy terms, it is an appropriate location for higher levels of development. Development opportunities at the town are constrained by the wide floodzone associated with the River Otter, numerous heritage assets and the narrow and congested road network, especially to the north and east of the town centre. This means that, despite the large number of site put forward to the HELAA, only a small number are considered suitable for development. To the west of the town, the road access is much better, and so the proposed development is focussed in this location. It should also be noted that the town's only industrial estate lies within the floodplain and so will not be allocated in the emerging plan. It is therefore important to include employment land within larger allocations if at all possible.

Allocated and Previously 'moved on' sites - Ottery St Mary



Site Ref	Site address	No of dwgs	Reason No	Commentary on matters raised at committee (in italics) - with summary officer response or reference to stand alone commentary further in this report section	Officer recommends allocating
Otry_10	Land to north and south of Salston Barton	20	1	<p>Directly to the north of the site Strawberry Lane is of a good width and visibility, however it narrows to the east and cannot accommodate a pavement to link into the town. Routes could be provided through the estate to the north. These would provide a safe route for pedestrians and cyclists.</p> <p>The agent, on behalf of the landowner, points out that the residents of Salston have always walked along Strawberry Lane. He has suggested the map below as a potential paved pedestrian route. Although it is some 500m further than the direct route along Strawberry Lane to the junction with Barrack Road. The total distance by footpath from the edge of the site to the town centre would still be less than 1600m (1 mile).</p>  <p>The developable part of the site is outside the EA's designated flood zones.</p>	<p>Yes</p> <p>For 20 new homes</p>

				<p>Coalescence with Salston Barton would inevitably occur as development would infill the 'gap' between it and the housing estate to the north, however there is sufficient space for a landscaped buffer to reduce the effect. Land to the north of the site is flatter and at a similar level to existing houses so development would not be overbearing/overlook existing houses but would remove the sense of separation and remoteness currently experienced. The western part of the site slopes upwards and buildings on the slope would be more prominent when viewed from Salston Barton.</p> <p>Residents of Salston Barton have expressed concern that 4 houses have a soakaway system that requires part of the development site to operate and the remaining 10 houses have a bacteria digester sewage system that can be overwhelmed if excess water enters it/it's drainage area. They are concerned that additional run off will cause flooding and prevent these systems from operating properly. There will no doubt be a technical solution to these issues which are not seen to be grounds not to allocate the site.</p>	
Ottry_01 a	Barrack Farm, Ottery St Mary	75	7	<p>This site in its entirety would extend a considerable distance to the west, requiring residents to walk around 1800m to the town centre (assuming that safe, direct pedestrian walkways can be provided). Members agreed to allocate Ottry_01b and making an allocation to the east into Ottry_01a is seen as a credible option that would lead to a more comprehensive development of this area. If extended to the east in line with the eastern extents of Ottry_09 then it could form a new eastern edge to the town. Beyond this the site becomes increasingly rural and prominent.</p> <p>The site is within the green wedge but is unlikely to cause visual coalescence due to the topography and intervening ridgeline.</p>	Yes for an additional 75 homes
GH/ED/2 6	Land west of Cadhay Lane, Ottery St Mary	40-200	4	<p>The north eastern field of this site (orange arrow on photo, which could accommodate around 40houses) adjoins a previously allocated site at Otry_01b. The remainder of the site was sifted out of the process due to its poor relationship with the town. The whole site is in the green wedge. It might be possible to develop a comprehensive urban extension with this whole site and Otry_01a/b however the</p>	No

topography means that the sites would be very prominent in the landscape, especially when viewed from the south. If the northeastern field is developed on its own it will look like an isolated housing estate in the countryside when viewed from King's



Reach/Salston/West Hill Road.

GH/ED/2
7

Land south of Strawberry Lane, Ottery St Mary

60

1

Strawberry Lane is narrow along its route to the east of the site and into the town centre. Routes could be provided through the estate to the north Although these are indirect they would provide a safe pedestrian and cycle route of less than 1600m (1 mile) into the town centre.



Coalescence with Salston has been raised as a concern. The floodzone to the south of the site will provide physical separation from Salston Ride and landscaping and layout could reduce the impact on these houses. EA advise that an 8m buffer from the watercourse should be kept undeveloped and the Woodland Trust advise that no development should be permitted within 50m of the ancient woodland (it is understood that this lies to the sw of the site). It should be noted though that Salston Ride comprises bungalows so the impact of

Yes
Yes
For 60 new homes

two storey houses on the southern part of the site will be greater- see photos from Salston Ride looking north at into the site. An indicative plan on the current outline



application indicates that this part of the site will remain undeveloped for flood attenuation and landscaping.

Development on the middle/south eastern part of the site may cause intervisibility/overlooking of Salston Barton due to topography as the site slopes upwards from existing dwellings.

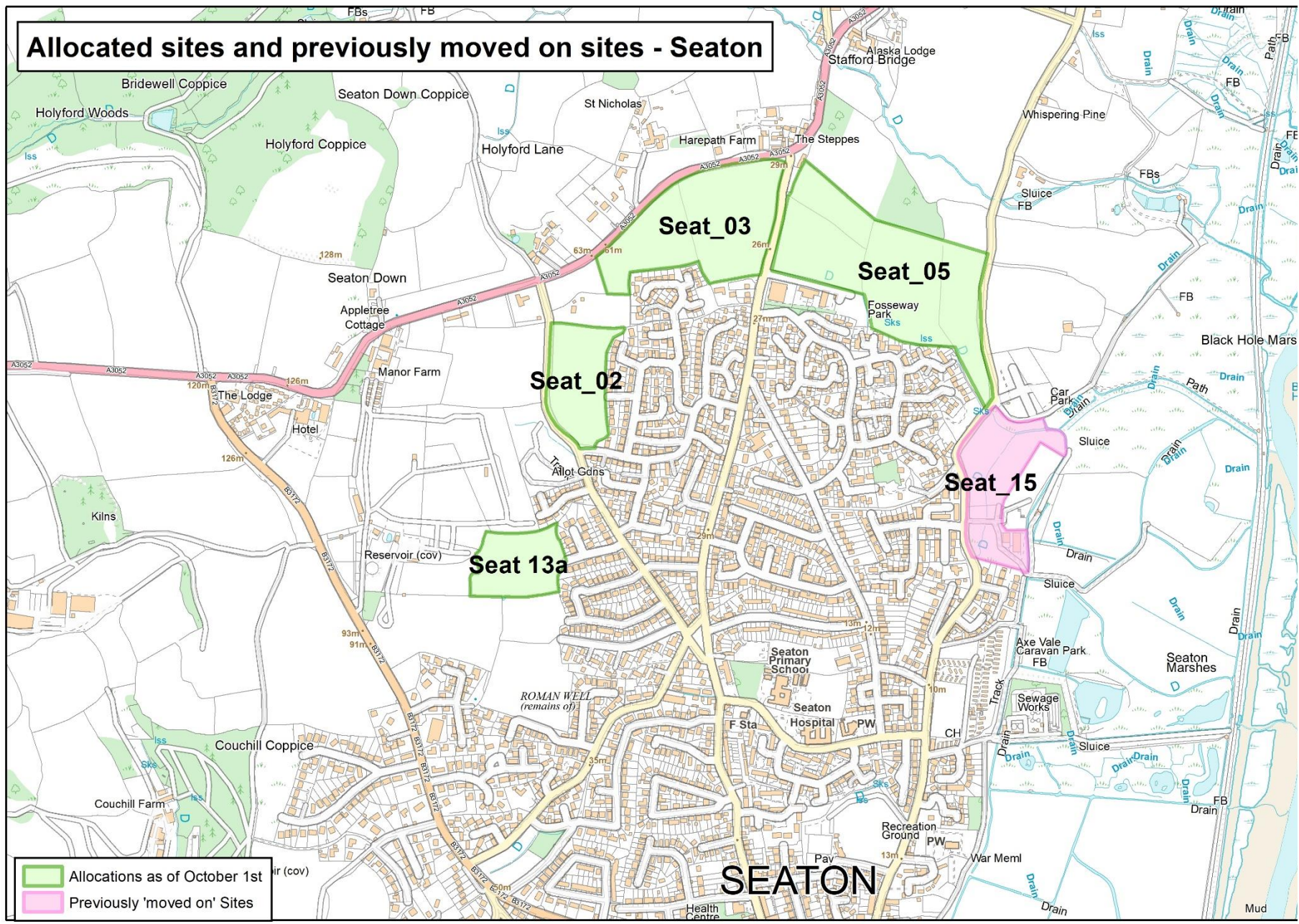
There is intervisibility between this site and the wider landscape, including the National Landscape when viewed from East Hill Strips.

As mentioned on site Otry_10 , residents of Salston Barton are concerned that development will prevent their sewage systems operating correctly, either by removing/reducing their soakaways or by producing extra run off which will overwhelm their capacity. There will be a technical solution to this issue which would be addressed at planning application stage.

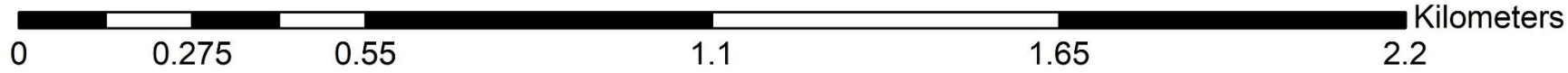
Sites at Seaton

Seaton is a Tier 2 settlement in the local plan and as such, in plan strategy terms, it is an appropriate location for higher levels of development. It is home to a wide range of community facilities including a variety of shops, sports facilities, a library, primary school, GP and hospital. The environmental constraints around Seaton limit the potential options for growth, comprising the River Axe and associated flood zone to the east, National Landscape also to the east, a rising landscape to the west, and sea to the south. In addition, the current adopted Local Plan designates land around the north of Seaton as Green Wedge.

Allocated sites and previously moved on sites - Seaton



- Allocations as of October 1st
- Previously 'moved on' Sites

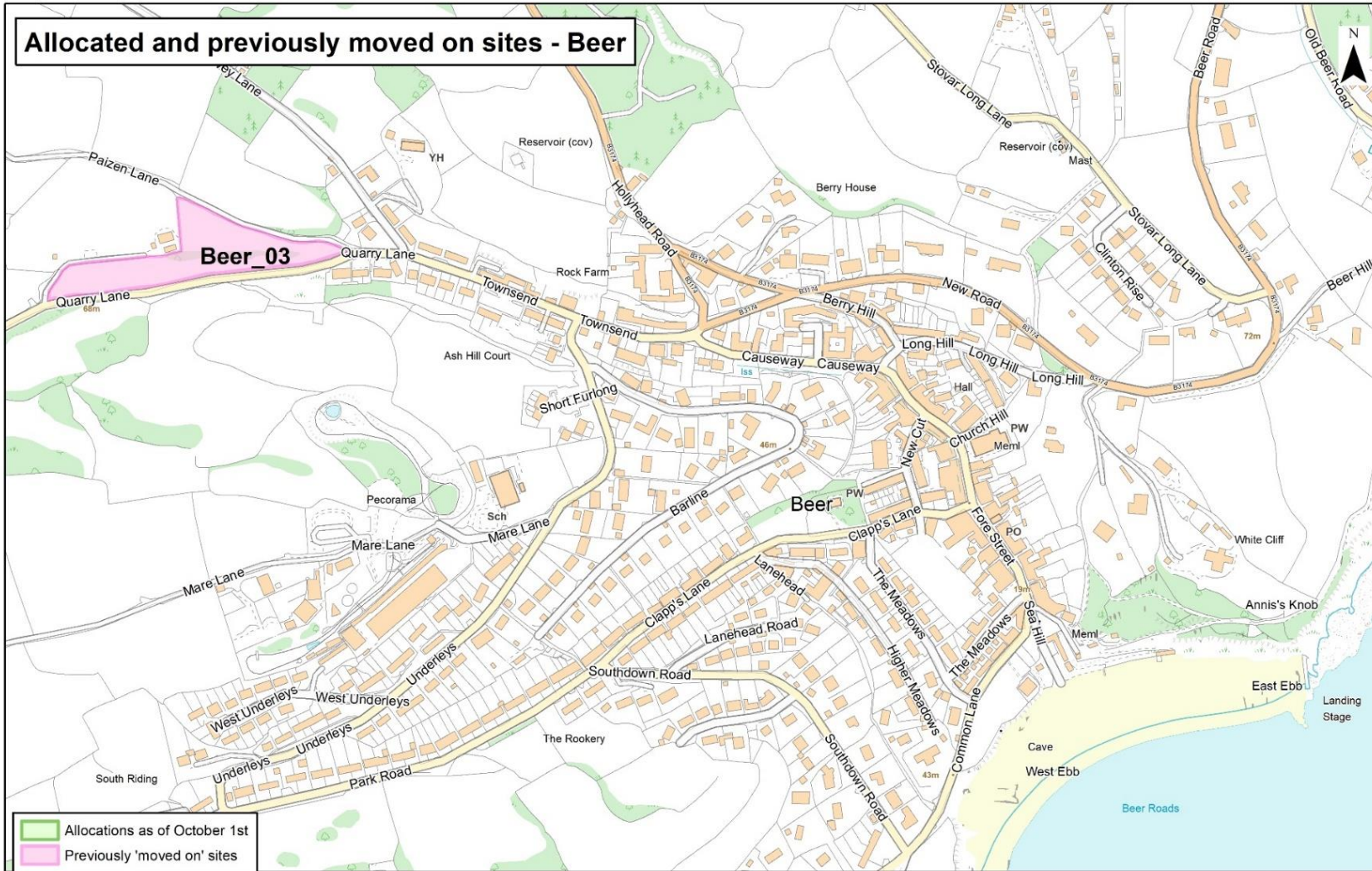


Site Ref	Site address	No of dwgs	Re a so n No	Commentary on matters raised at committee (in italics) - with summary officer response or reference to stand alone commentary further in this report section	Officer recommends allocating
Seat_15	White Cross, Colyford Rd, Seaton	36	4	Across road from proposed allocation Seat_05 and hence within the criteria for inclusion on this agenda, however officers continue to recommend rejection due to adverse impact on ecology (partly within county wildlife site, close to local nature reserve) and flood risk (northern half of site has high flood risk, with surface water flood risk elsewhere).	No

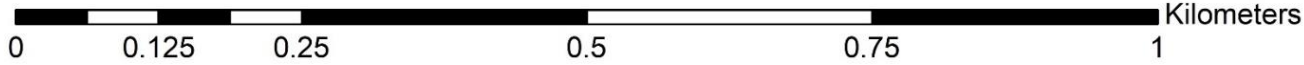
Sites at and around Beer

Beer is a Tier 4 settlement in the emerging Local Plan hierarchy and as such, in plan strategy terms as a service village, it is an appropriate location to allow limited development to meet local needs. A site has not as yet been allocated through the emerging plan. Members should however note that there is an allocation in the made Neighbourhood Plan which has outline planning consent for 30 homes on land south of Little Hemphay and therefore there is a degree of planned growth in the development plan as a whole.

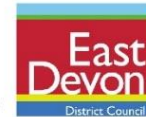
Allocated and previously moved on sites - Beer



- Allocations as of October 1st
- Previously 'moved on' sites



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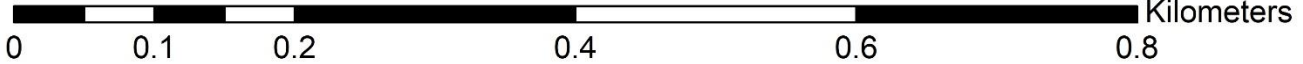
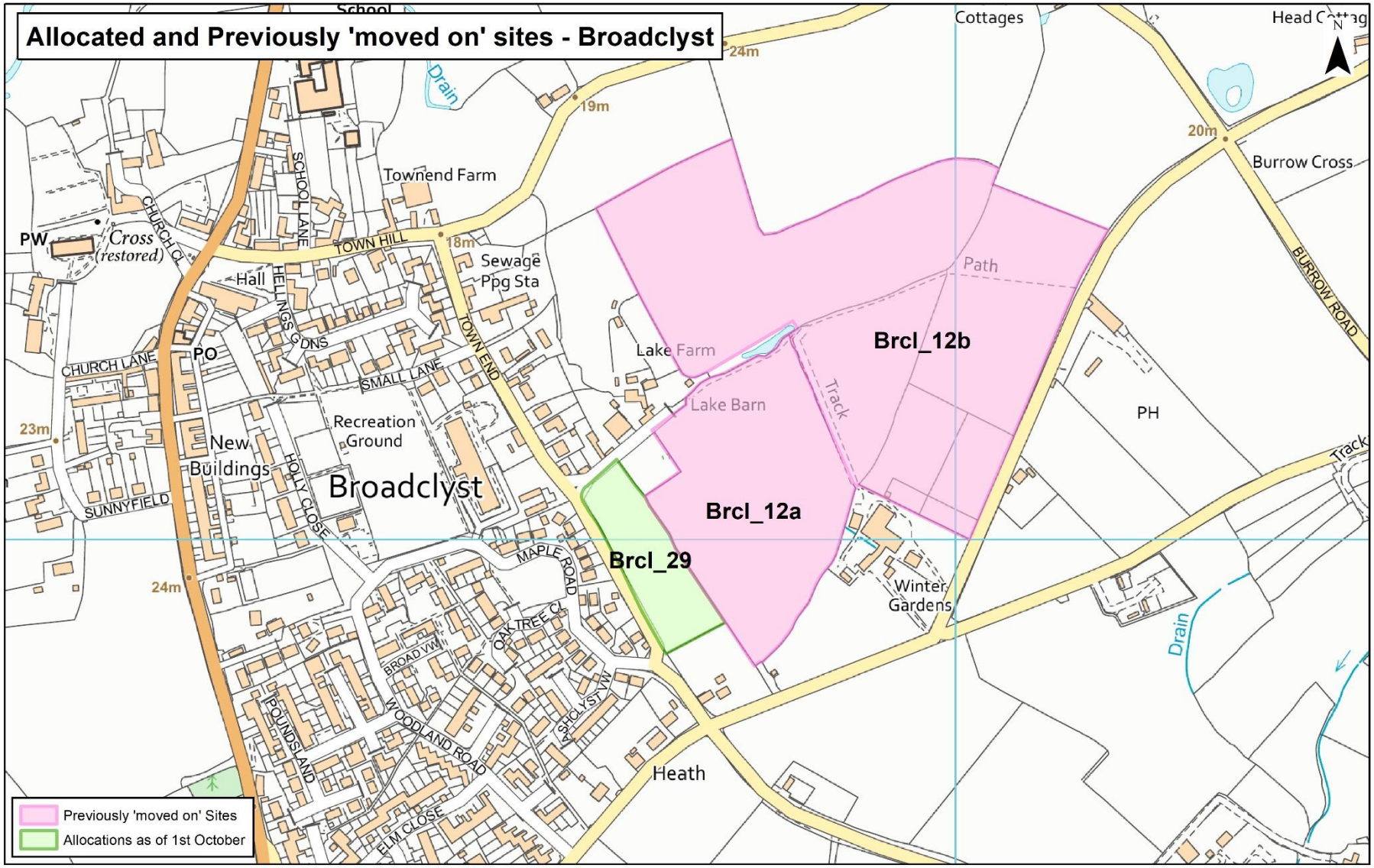


Site Ref	Site address	No of dwgs	Re a so n No	Commentary on matters raised at committee (in italics) - with summary officer response or reference to stand alone commentary further in this report section	Officer recommends allocating
Beer_03	Land at Quarry Lane, Beer	15	7	This site is wholly within the National Landscape and lies just over 200m west of the Beer Quarry Caves SAC/SSSI. It is likely to be used by foraging bats. The shape and change in levels within the site between the linear portion that stretches along Quarry Lane and the higher ground in the northern triangular portion, with an area of semi-mature vegetation east-west crossing the centre of the site, limits the potential developable area. Development to any substantive degree would constitute a ribbon development protrusion into the countryside along Quarry Lane. The site feels rural and remote in the most part, particularly as you travel west. A small development of less than 5 dwellings may be possible in the easternmost part of the site which lies close to existing residential development and would be within walking distance by pavement of Beer village centre. The Highways Authority are satisfied that a safe access could be created although substantial hedgerow removal would be required to achieve access and deliver a scheme. The submitter suggested that there has been positive engagement with the Parish Council about this site and that other uses – e.g. employment, community uses, parking - may be suitable. The potential noted at the working group for the easternmost part of the site was related to whether it could be considered for some very small-scale development of unspecified nature, through a neighbourhood plan review. Potential for allocation through the Local Plan was not supported during that discussion and Officers' recommendation is unchanged.	No

Sites at and around Broadclyst

Broadclyst is a larger Tier 3 settlement in the local plan and as such, in plan strategy terms as a local centre, it is an appropriate location for moderate levels of development. At present it has limited growth levels proposed within the village, with just one land allocation, albeit growth levels in the wider parish have been very high.

Allocated and Previously 'moved on' sites - Broadclyst



Site Ref	Site address	No of dwgs	Re a s o n No	Commentary on matters raised at committee (in italics) - with summary officer response or reference to stand alone commentary further in this report section	Officer recommends allocating
Brcl_12	Land west of Whimble Rd, Broadclyst	70 if Brcl_12a only; 136 if site in its entirety; pre app for 145	1, 3	At the SPC Site Selection meeting, members requested further information on the potential for main access from Whimble Road through part of Brcl_12b to Brcl_12a. A <u>concept masterplan</u> is now available to view (previously part of a confidential pre app) which shows residential development in Brcl_12a and public open space, a play area, employment units and self-build plots alongside an access road from Whimble Rd in Brcl_12b. This should help allay members' doubts over allocating Brcl_12 in its entirety (i.e. Brcl_12a and Brcl_12b).	Yes For 100 new homes Further work is needed – but this could be a credible blend of 12a and part of 12b

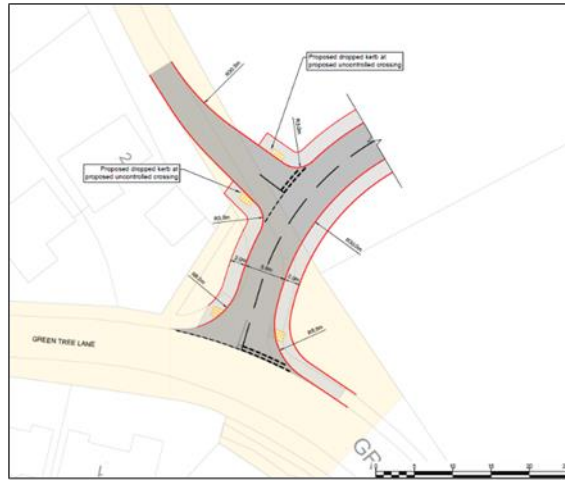


It is regarded that a good quality comprehensive development could be accommodated on this land, allocation is recommended.

Members have already agreed to allocate Brcl_29 which lies to the south west of this site.

Since the SPC site selection meeting, we have been provided with a technical drawing to confirm how Brcl_29 would be accessed – a new junction to the south-

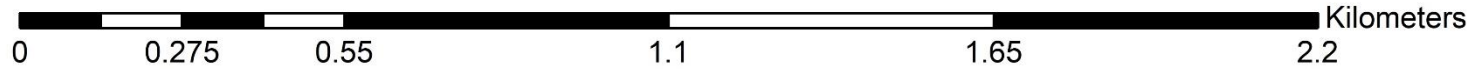
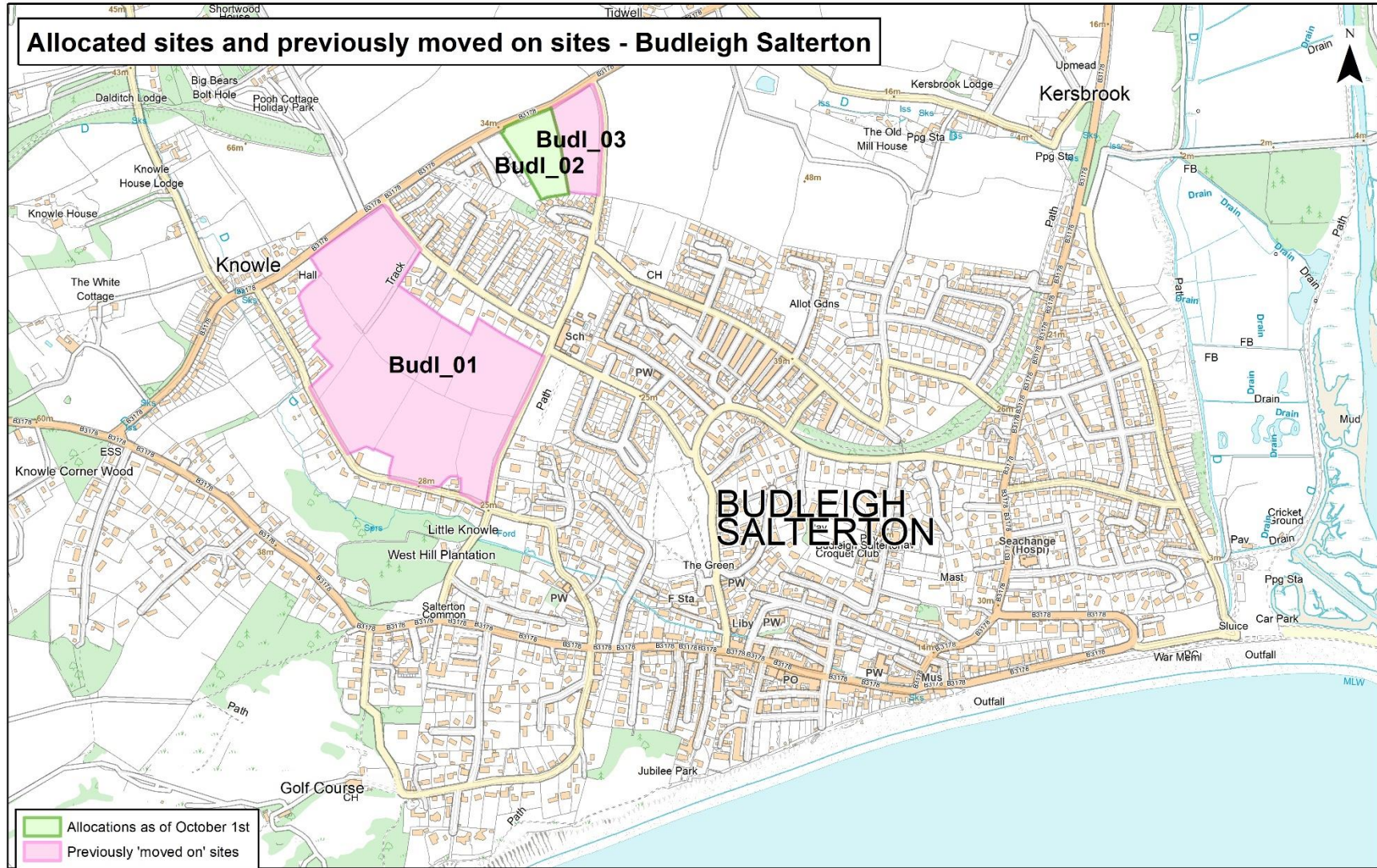
west (see below left) which would appear to make the site a more attractive proposition. It would be a remodelling of the junction pictured below right. It could also potentially provide a through access into Brcl_12 although we are not aware of any agreement between the different parties to accommodate this. If both sites were to be allocated it would be reasonable to secure connecting routes between the two sites through policy.



Sites at and around Budleigh Salterton

Budleigh Salterton is one of the larger 'local centres' (tier three settlements) with a good range of services and facilities, but it is wholly within the East Devon National Landscape. The currently agreed allocation equates to an increase in the number of dwellings of around 1.3%, which is low in relation to the plan strategy of local centres providing growth to meet local needs and the needs of surrounding settlements.

Allocated sites and previously moved on sites - Budleigh Salterton



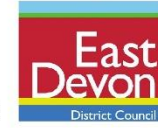
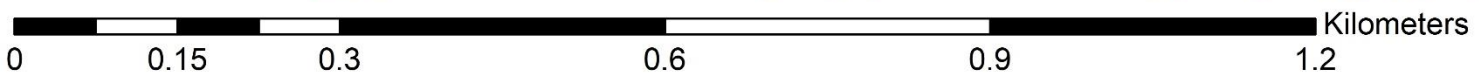
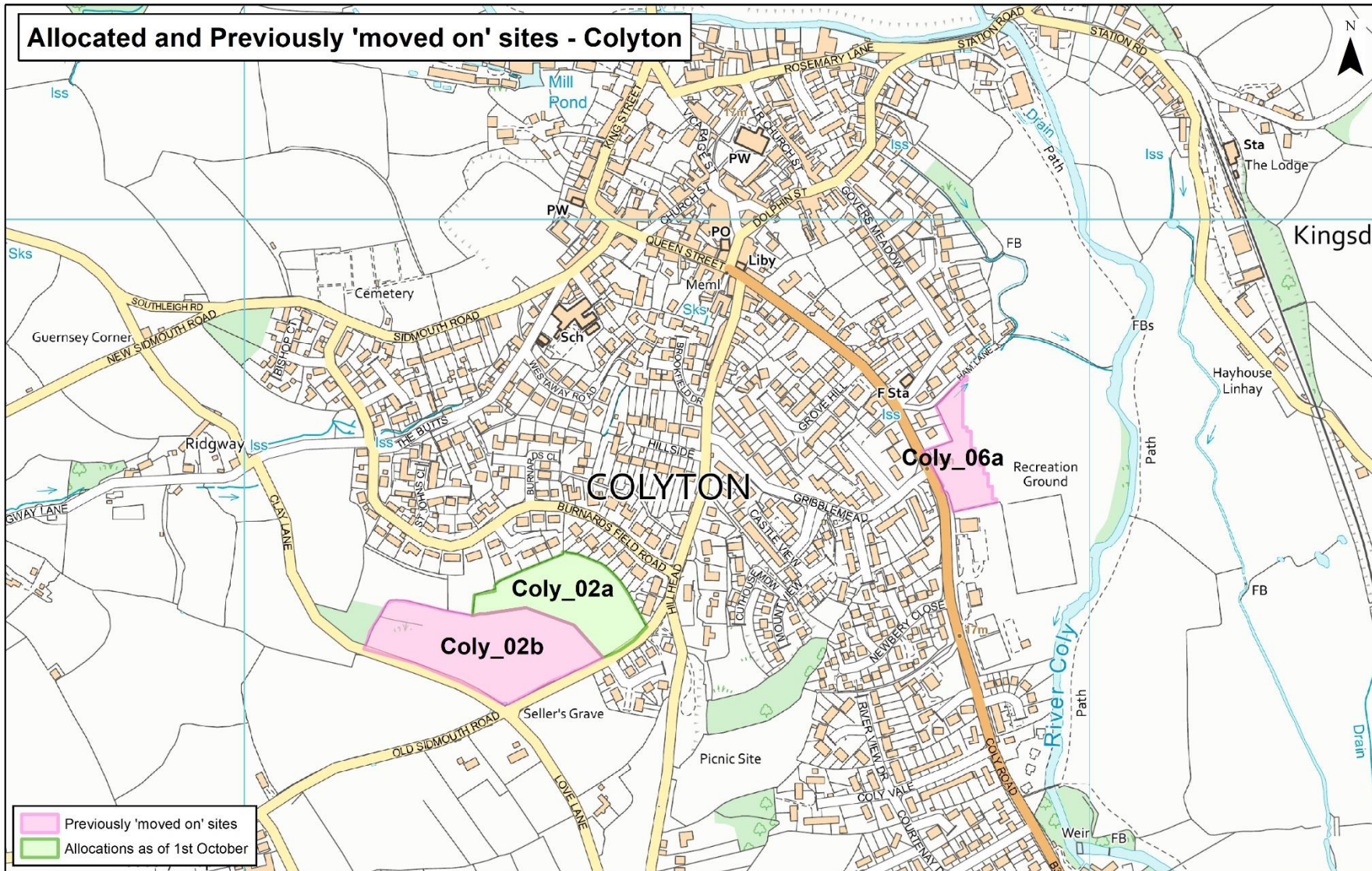
Site Ref	Site address	No of dwgs	Reason No	Commentary on matters raised at committee (in italics) - with summary officer response or reference to stand alone commentary further in this report section	Officer recommends allocating
Budl_01	Land adj. Clyst Hayes Farm house, Budleigh Salterton	50	8	This is a large site with an overall capacity for 350 dwellings that is largely surrounded by housing and is well related to the existing settlement pattern with good access to services and facilities. However, it is in the green wedge and parts of the site are elevated and development in these locations would have significant landscape impacts, including longer range views within the East Devon National Landscape. Part of the site (the two fields to the northeast of the site, close to the school) have been identified as more suitable for development in landscape terms, but they are some distance from the existing access, which is on the higher and more sensitive part of the site. The site was not recommended for allocation on the basis that there is no highways access to the parts of the site least sensitive to landscape change, so it is not considered to be deliverable. It may be possible to achieve access (to Bedlands Lane) by securing access through an adjoining dwelling, but without the certainty of this it would be difficult to demonstrate that the site is deliverable.	No
Budl_02	Land at Barn Lane, Budleigh Salterton	35 (previously 25)	5	SPC has agreed this site on the northeast edge of the settlement for 25 dwellings. Further consideration has been given to the potential yield of this site and it is recommended that this can be raised to 35 dwellings.	Yes For 35 new homes
Budl_03	Land at Barn Lane, Budleigh Salterton	44	4	This site adjoins the proposed allocation at Budl_02, but is in different ownership. Indicative plans show it being accessed from Barn Lane, a single track lane, whereas Budl_02 is accessed from the B3178. The landscape assessment for the site concludes that "Budl_03 is located in the East Devon National Landscape and overall landscape sensitivity is high. The landscape is open and prominent in views when approaching the settlement, the undeveloped character of the site contributing to the overall setting of the town, which is wholly within the National Landscape.". If the adjoining site were to be developed, there would be housing on two sides of the site, but development here would significantly extend the perception that the urban area was intruding into the landscape beyond the town and would adversely impact 'gateway' views. The site is also closer to Tidwell House, a grade II* listed building, and development has the potential to affect the setting of this heritage asset.	No

			Although the heritage assessment concludes that it would be possible to mitigate any impact through careful design, this (together with the landscape implications) would be likely to reduce the potential yield of the site quite significantly.	
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<u>Sites at Colyton</u>	
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Colyton is a larger Tier 3 settlement in the local plan and as such, in plan strategy terms as a local centre, it is an appropriate location for moderate levels of development. At present it has limited growth levels proposed, with just one land allocation.	
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Allocated and Previously 'moved on' sites - Colyton

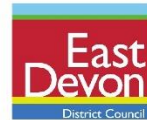
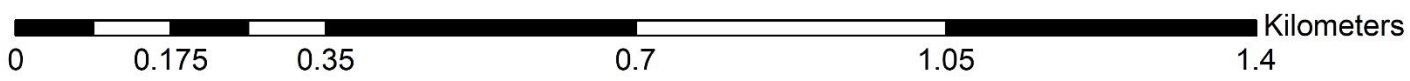
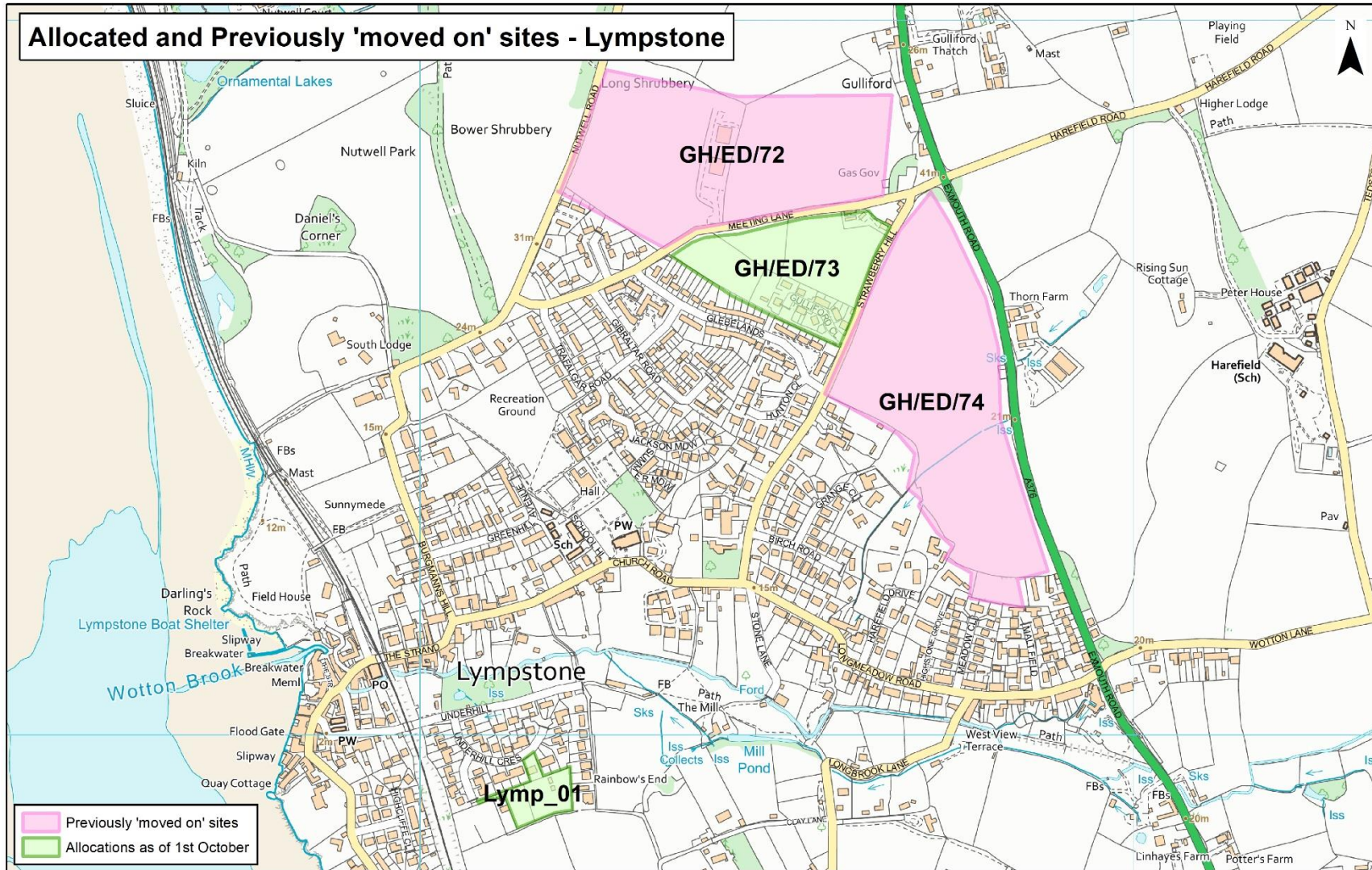



Site Ref	Site address	No of dwgs	Re a so n No	Commentary on matters raised at committee (in italics) - with summary officer response or reference to stand alone commentary further in this report section	Officer recommends allocating
Coly_2b	Land at Hillhead, Colyton	24	1	<p>At the SPC Site Selection meeting, members allocated Coly_02a but 'moved on' from Coly_02b with the request that the <u>full landscape assessment</u> for the site and any further detail on highway access arrangements and acceptability be made available.</p> <p>DCC Highways have previously stated that accessibility from Clay Lane and Old Sidmouth Road is OK.</p>	<p>Yes</p> <p>For 24 new homes</p>
Coly_6a	Land to South and East of Colyton	12	1, 3	<p>At the SPC Site Selection meeting, members raised the possibility of this area of land being earmarked for a future new school.</p> <p>When asked for comment, DCC Education replied: "The primary school currently sits on a very constrained site and is undersized when compared to Government guidance so having a site identified would be welcomed. I understand there is a community desire to retain this land for the school should there be a funding stream in the future. This is a position that Devon County Council would support given the constraints of the existing sites and the demographics in the area."</p> <p>Devon County Council have no current plans to deliver a school on this site and the landowner has put it forward as a site for residential development. The community aspiration for a school here is acknowledged however, it would not be reasonable or defensible to reject this site and seek to retain it for a potential school when this may never be delivered and it does not appear to be the owners intention to make it available for these purposes.</p>	<p>Yes</p> <p>For 12 new homes</p>

Sites at and around Lympstone

Lympstone is a tier 3 settlement in the local plan and, as such, is suitable for moderate levels of growth. Members have previously agreed to allocate a total of 60 homes in the village but there are two large sites that adjoin one of the previously agreed allocation that could present opportunities for larger scale development in this location.

Allocated and Previously 'moved on' sites - Lypstone



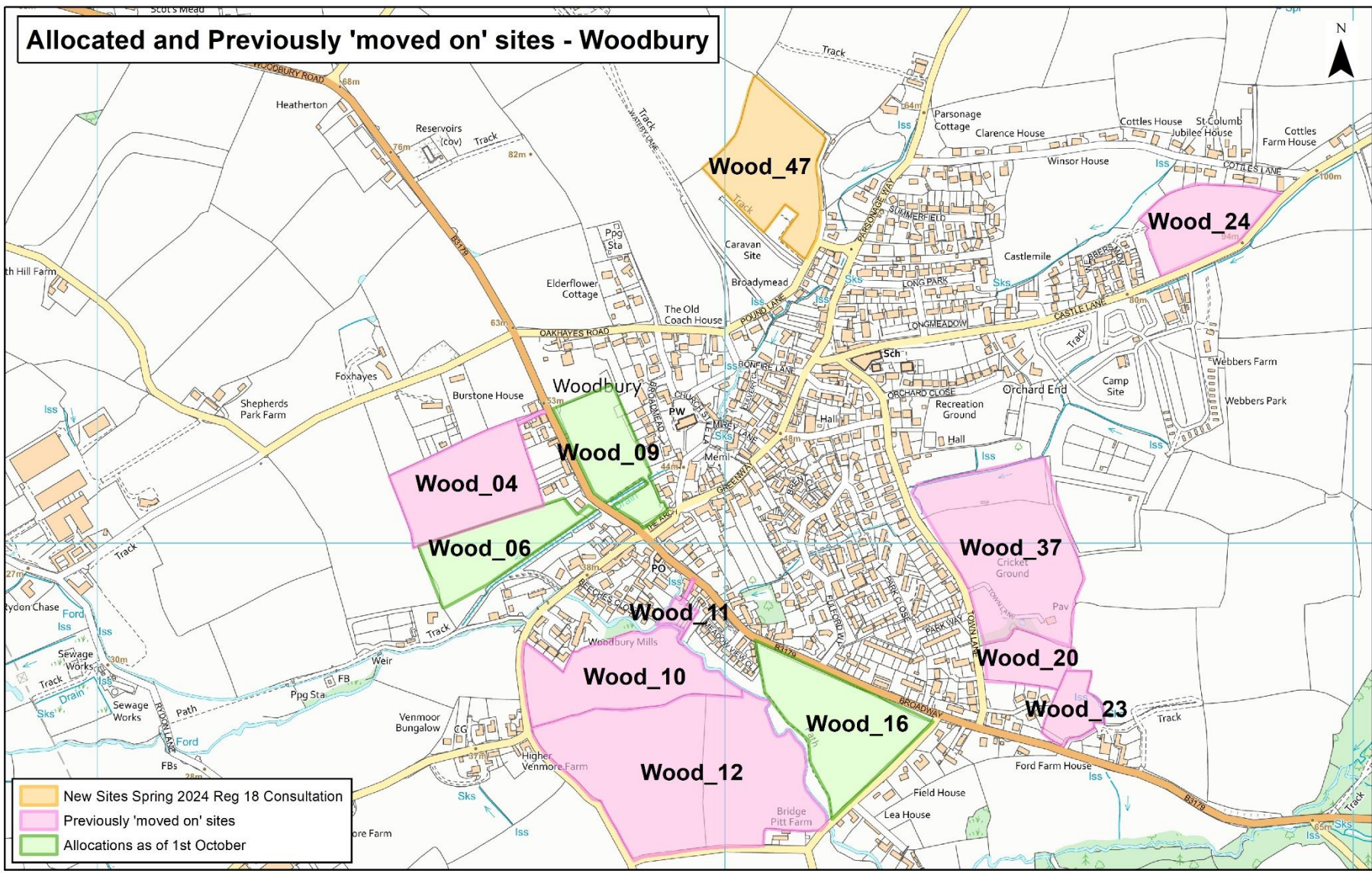
Site Ref	Site address	No of dwgs	Reason No	Commentary on matters raised at committee (in italics) - with summary officer response or reference to stand alone commentary further in this report section	Officer recommends allocating
GH/ED/72	Land at Meeting Lane, Lymstone	60	7	<p>The 'full' landscape sensitivity assessment states there is potential for small-scale development in the south west part of the site, adjacent to existing dwellings and better contained within the existing landform. Around 1.5 hectares is potentially suitable for around 42 dwellings (indicated on map below), but need to consider impact on Nutwell Park to west including Grade II* Nutwell Court, and the location within the Coastal Preservation Area. Detailed landscape and historic environment assessments have been added to the site assessment at Appendix 1.</p> 	Yes For 42 new homes

GH/ED/74	Land at Strawberry Hill, Lympstone	141	4	This site is presented for further consideration as it lies directly opposite GH/ED/73 which has previously been agreed for allocation, however the impacts of this site in terms of its landscape sensitivity, medium impact on 3 grade II listed buildings as well as impacts on ecology and poor pedestrian accessibility mean that allocation is still not favoured. There are no parts of the site that are notably less sensitive than others to suggest that a partial allocation of the site would be appropriate either.	No

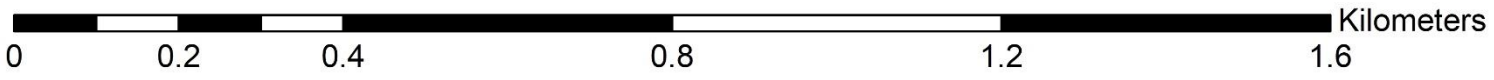
Sites at and around Woodbury

Woodbury is a Tier 3 settlement in the local plan and as such, in plan strategy terms as a local centre, it is an appropriate location for moderate levels of development. At present it has allocated sites equating to 218 homes that would be a comparatively high level of growth in comparison to existing settlement size. The village is however relatively unconstrained compared with many in the district and well served by services and facilities.

Allocated and Previously 'moved on' sites - Woodbury



- New Sites Spring 2024 Reg 18 Consultation
- Previously 'moved on' sites
- Allocations as of 1st October



Site Ref	Site address	No of dwgs	Reason No	Commentary on matters raised at committee (in italics) - with summary officer response or reference to stand alone commentary further in this report section	Officer recommends allocating
Wood_04	Land off Globe Hill, Woodbury .	28	4	<p>Adjoins preferred allocation Wood_06.</p> <p>Not recommended for allocation due to medium/high landscape sensitivity to new development. Harm to heritage assets. Loss of best and most versatile agricultural land (Grade 2). West part within high pressure gas pipeline zones.</p>	No
Wood_10	Land at Gilbrook, Woodbury	60	1	<p>At SPC, Woodbury Parish Council and local residents objected to allocating this site because of a lack of safe pedestrian access into Woodbury, and the road and bridge not being suitable for the level and type of traffic from the site.</p> <p>Planning application 23/2166/MOUT for 60 dwellings is pending a decision on this site. Devon County Council (DCC) comments on this application state "...the proposed access provides a visibility splay which accords to our current best practice..." DCC also note a proposed off-site footway project will improve pedestrian access over Gilbrook Bridge. Therefore, it is considered that suitable access can be achieved to Wood_10.</p>	<p>Yes</p> <p>For 60 new homes</p>
Wood_11	Land at the Rear of Escot Cottages, Broadway, Woodbury , EX5 1NS	5	4	<p>Adjoins preferred allocation Wood_10.</p> <p>Not recommended for allocation because of unsuitable highways access and potential heritage impact given location within the Conservation Area means this site should not be allocated. There are no realistic opportunities to develop the site in conjunction with Wood_10 if Members were minded to allocate that site as it lies the opposite side of water course from Wood_10.</p>	No
Wood_12	Land to the East of Higher Venmore Farm, Woodbury	141	4	<p>Adjoins preferred allocations Wood_10, 16.</p> <p>Not recommended for allocation because of high/medium landscape impact. The site comprises of two large arable fields in a prominent location on rising land. Long distance views of the site are available, including from B3179 to east, and also from B3179 to the north of Woodbury. The site is surrounded by fields with limited context of built form, so such views show the site as being in a rural area. Its development would have a significant detrimental landscape impact.</p>	No

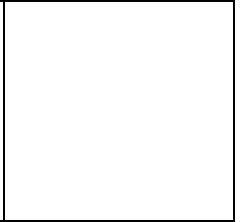
Wood_3 7	Cricket Field off Town Lane, Woodbury	81	4	<p>Adjoins preferred allocation Wood_20.</p> <p>Not recommended for allocation as would result in loss of cricket pitch, an important community facility; adverse ecological impact; and High/medium landscape sensitivity.</p>	No
Wood_2 0	Land at Town Lane, Woodbury	28	1	<p>At SPC, Woodbury Parish Council did not support the site, due to the narrow nature of Town Lane and the access to the local primary school being dangerous with poor visibility. A planning agent on behalf of the site promoter stated access could be discussed further based upon the concerns raised.</p> <p>It is acknowledged in the site assessment that Town Lane is narrow and lacks pavement for most of its length, although this is not a 'main' road. The route south from the site is 75m to an existing pavement on the B3179, and then a short (400m) walk to facilities in the settlement centre. The route north to the primary school is around 500m, with nearly the entire route narrow and lacking pavement. Therefore, whilst the distance to facilities and services is relatively short, the quality of the route for pedestrians and cyclists is poor. However, the cricket pitch has very limited car parking space and so is presumably accessed primarily by foot and cycle already. Overall, the Site Selection report concluded that the lack of other constraints and housing need outweighed the poor quality route for pedestrians and cyclists.</p>	Yes For 28 new homes
Wood_2 3	Ford Farm, Woodbury	18	4	<p>Adjoins preferred allocation Wood_20.</p> <p>Not recommended for allocation because of high/medium landscape impact, lack of footpath connection on a busy road (B3179).</p>	No
Wood_2 4	Land North East of Webbers' Meadow, Castle Lane, Woodbury	35	3, 6, 7	<p>Site promoter at SPC stated only western part of site could be developed, which could address landscape impact concerns. Other preferable sites in Woodbury. Working Group noted some past community support.</p> <p>The site promoter has submitted the map below, which shows housing development in the western, lower part of the site, accommodating up to around 40-45 dwellings. This would avoid development in the more prominent eastern part of the site, which is shown as an open area for possible village amenity uses. If Members resolve to allocate this site, it is suggested that the allocation policy makes clear that built development is only suitable in the western part of the site (which equates to approx 1.3 hectares), with the eastern part only suitable for open space.</p>	No



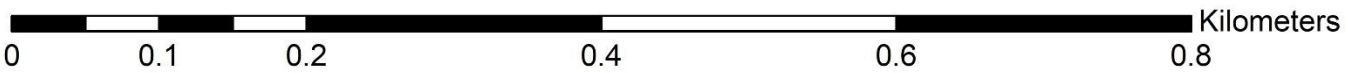
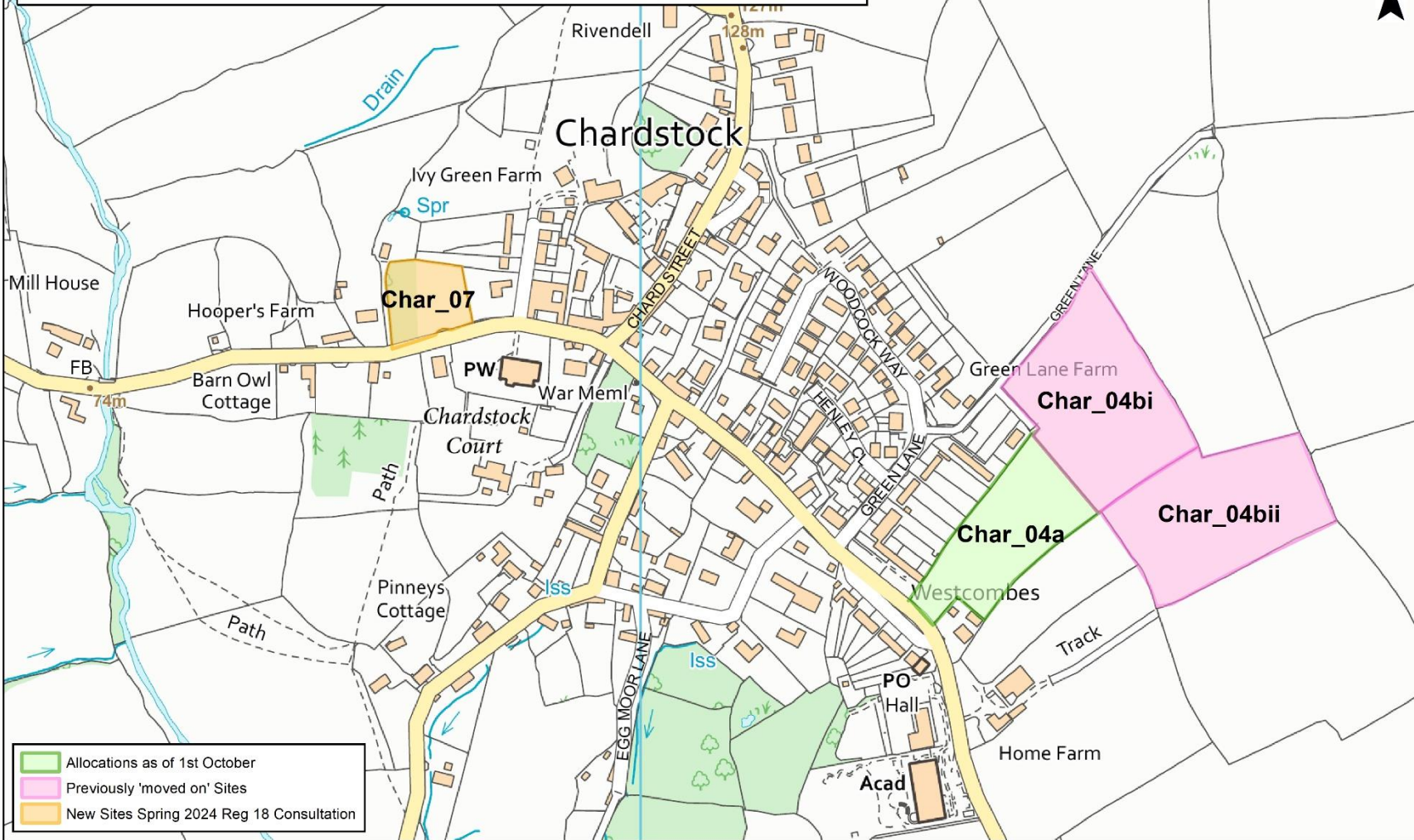
Wood_4 7 (Wood_1 4 + additional land)	Land West of Pound Lane, Woodbury	59	9	<p>Larger site overlapping existing Wood_14. Additional land submitted through further Reg 18 consultation.</p> <p>Not recommended for allocation as initial part of journey along narrow country lane; adverse landscape impact; loss of best and most versatile agricultural land (Grade 2).</p>	No
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Sites at and around Chardstock

Chardstock is a Tier 4 settlement in the emerging local plan and as such, in plan strategy terms as a service village, it is an appropriate location to allow limited development to meet local needs. At present it has one allocated site for up to 30 homes. This would accommodate a reasonable appropriate level of growth given its place in the settlement hierarchy and the nature of the settlement. However, there may be an opportunity to increase the allocation to include more of the original site submission within the allocation. The implications are considered below.



Allocations, Previously 'moved on', and New Sites - Chardstock

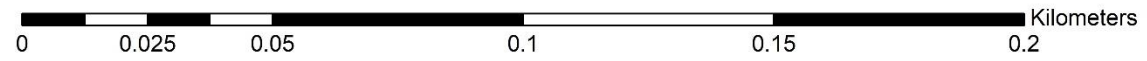


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Site Ref	Site address	No of dwgs	Re a so n No	Commentary on matters raised at committee (in italics) - with summary officer response or reference to stand alone commentary further in this report section	Officer recommends allocating
Char_04 b	Land off Green Lane, Chardstock	Additional 15 (when combined with Char_04a)	4, 6	<p>The original site submission was the entire area of 04a and 04b combined. This is made up of 3 fields. The most suitable / appropriate field for a natural extension/infill development at Chardstock for limited growth is the allocated site (04a). Members agreed to allocate 04a for up to 30 dwellings at their meeting on the 20th September. On standard HELAA methodology for density, this should be corrected to 24 dwellings based on 80% net developable. There is however potential to consider extending the allocation to include all or part of the area of the field immediately adjoining 04a and Green Lane (labelled as Char_04bi above). As can be seen from the map, this would constitute more of a protrusion into the countryside, beyond the existing eastern extent of the built-up area. It is also immediately adjoining (opposite Green Lane from) land within the Blackdown Hills National Landscape, and therefore viewed in context with it. This area occupies slowly rising ground and is considered to have a higher landscape value and susceptibility to development than the currently allocated area, but overall, a slightly lower susceptibility to development than the further field (Char_04bii on the map), as it is less visible than this field in views from the NL to the west.</p> <p>Char_04bi, if combined with Char_04a, could accommodate up to 45 dwellings. There may be some opportunity by extending the development into this middle field to develop a more comprehensive scheme and enable a pedestrian link from the allocation site into the nearby estate development (although the latter is not an overriding reason to allocate as such a link would appear to be of limited additional benefit). On balance, the additional harm arising from extending the allocation beyond 04a into 04bi is arguably limited, but the scale of development at this smaller Tier 4 settlement may however suggest a figure lower than 45 is appropriate. Officers suggest 30-35 may be reasonable.</p> <p>For reasons of landscape impact, poor relationship with the settlement edge as well as adjoining an area of habitat importance, Officers would not recommend allocation of 04bii. Development into this area, and therefore encompassing the whole of</p>	No

				Char_04a and 04b for residential use would also likely be of a disproportionate scale for this Tier 4 settlement.	
Char_07	NW edge of Chardstock, EX13 7BY	0	9	<p>This site was submitted as part of the further Regulation 18 consultation in May/June 2024. The site has significant constraints. It lies wholly within the Blackdown Hills National Landscape and within the Chardstock Conservation Area in the historic core of the village of Chardstock, in close proximity to a number of Grade II / II* buildings including the Grade II Old Vicarage and Grade II* St Andrew's Church which are opposite the site on the other side of the lane. The site as it currently stands provides a tranquil undeveloped backdrop/setting to the church cemetery at the western gateway to the village. Although there are no ecological designations covering the site itself, there are habitats of importance in close proximity and the site itself is very enclosed and in part covered by mature and semi-mature trees, around and extending from its boundaries. This vegetation is very dense and extensive in places, which significantly reduces the likely potential net developable area and can reasonably be expected to hold a degree of unrecognised ecological value locally. Extensive removal of vegetation would be needed should a site access be required from the lane. There are however detached properties set back from the road in close proximity to the site and on either side of it. Several of these are of modern design and these are well screened. It is suggested that the available site area is too small for allocation through the Local Plan, but there may be some limited potential for 1-2 high quality (perhaps self-build) dwellings, particularly if access could be achieved through other means which would minimise heritage impact. Officers consider it more appropriate given all the sensitivities and the restricted net developable area to reject this site as a local Plan allocation but to include the land within the settlement boundary.</p> <p>The aerial image below illustrates key points in this commentary:</p>	No



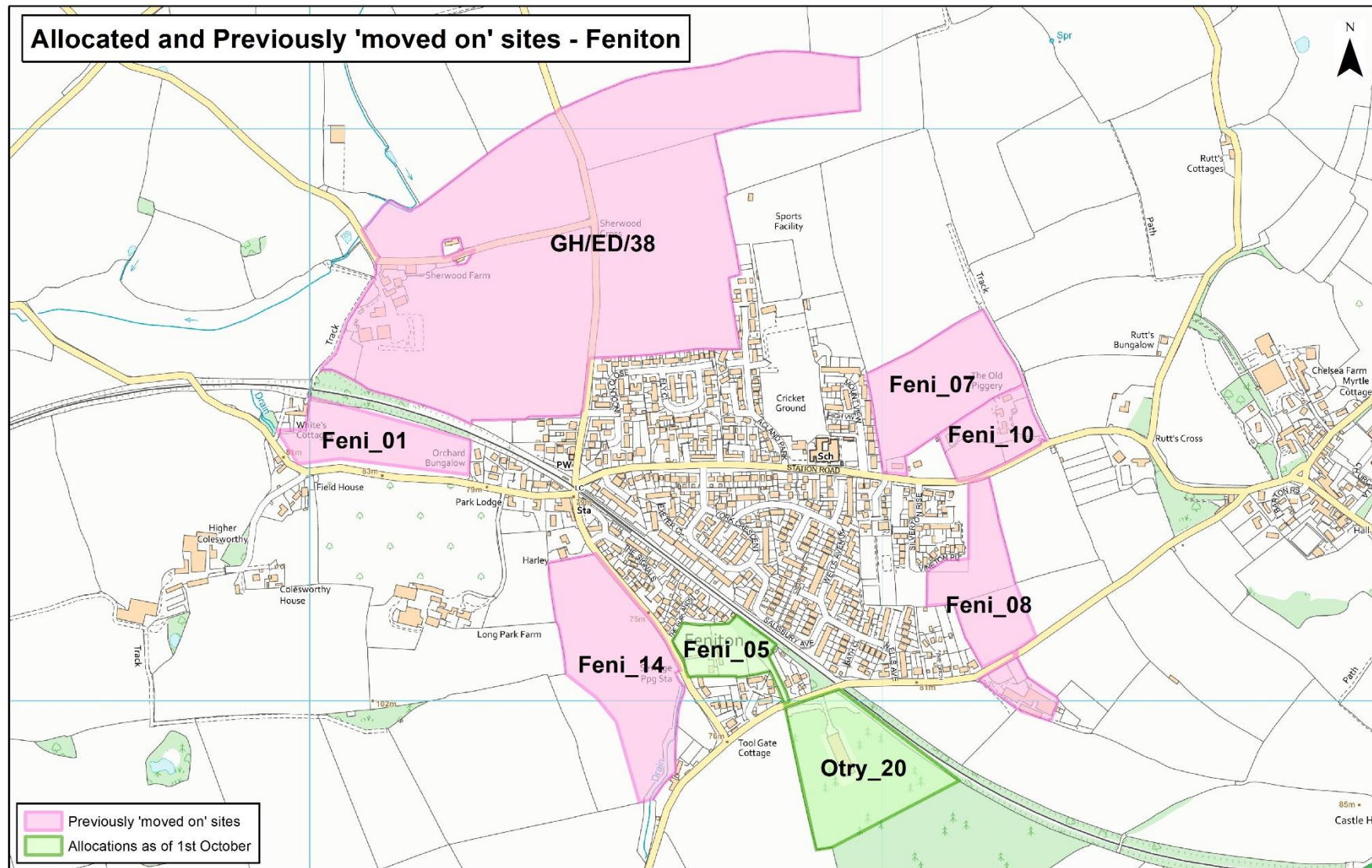
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Sites at and around Feniton

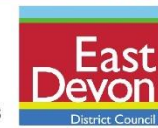
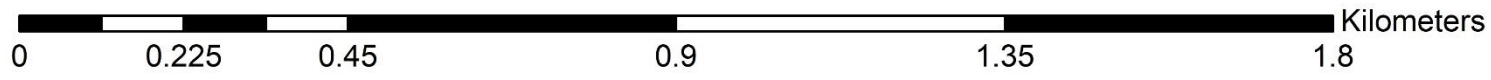
Feniton is a Tier 4 settlement with an allocation that is roughly proportionate, in comparison with other tier 4 settlements that have allocations, to the scale of existing development at the village. It is, however, a village with a number of promoted sites that perform comparatively well as stand-alone site choices noting that there are comparatively few landscape, biodiversity or heritage constraints at and around the village. A key consideration is the scale of growth that may be seen as appropriate for Feniton. If favoured for larger scale strategic growth (perhaps for several hundred new homes) it would potentially need to sit aside from other Tier 4 settlements, potentially in a classification of its own. It should be noted that as part of the draft plan consultation we did consult on scope for accommodating larger scale strategic growth at Feniton, though this was not a popular option amongst respondents.

We show on the map below, and in the table that follows, some of the better performing sites at Feniton. In general, taken as individual sites, as opposed to looking at collective impacts or implications of development of a number of sites, these are comparatively unconstrained and as such, compared to much of East Devon and many sites in the district, perform well. In this respect there are other sites in the village, on the south-western side, that could also be regarded as potential allocations, should strategic scale growth be favoured.

Allocated and Previously 'moved on' sites - Feniton



Legend:
Pink: Previously 'moved on' sites
Green: Allocations as of 1st October



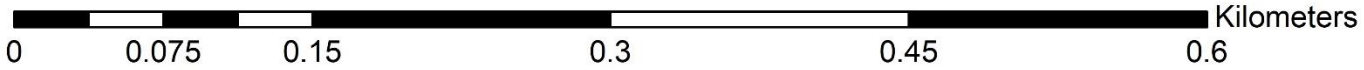
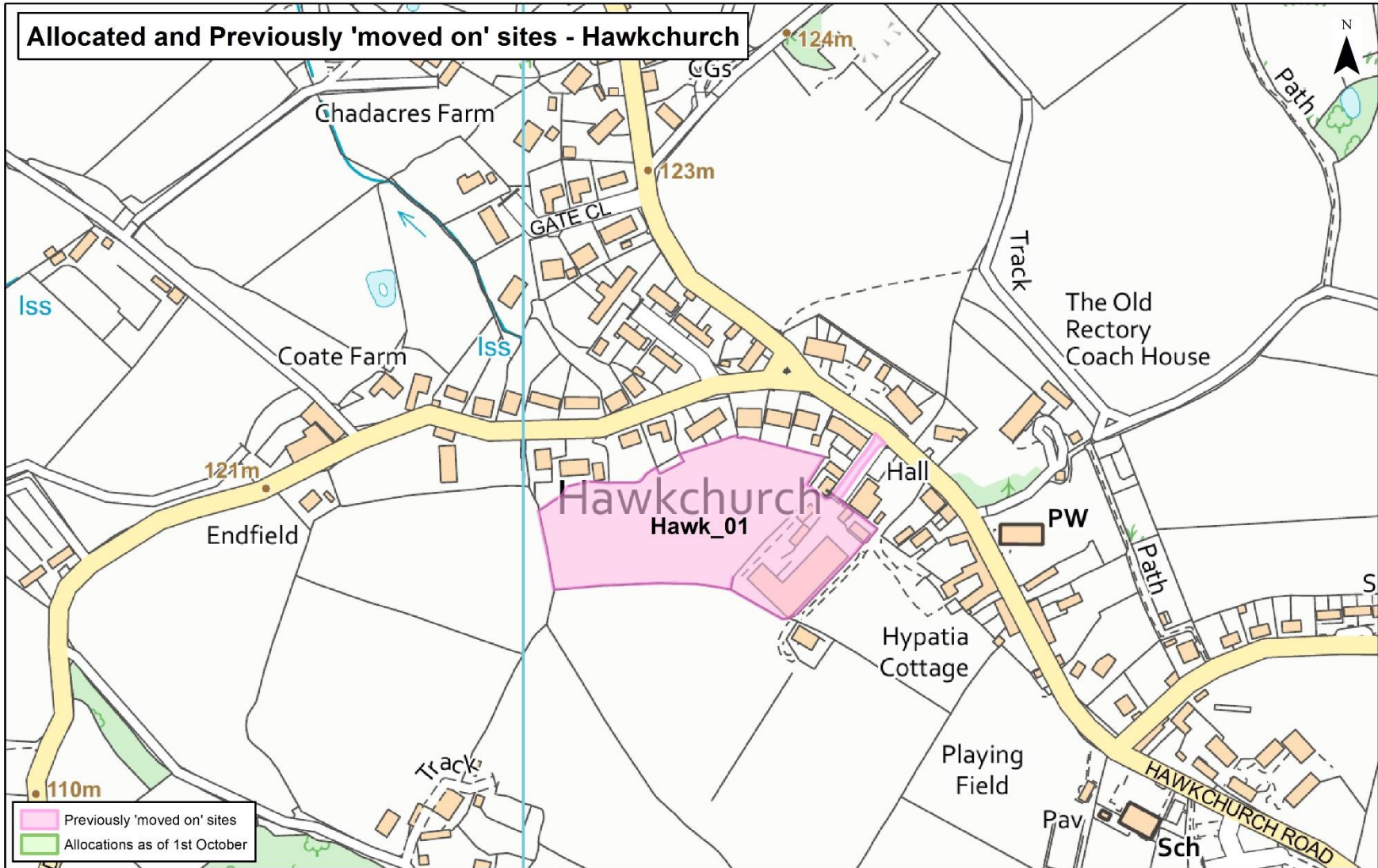
Site Ref	Site address	No of dwgs	Reason No	Commentary on matters raised at committee (in italics) - with summary officer response or reference to stand alone commentary further in this report section	Officer recommends allocating
GH/ED/38	Land at Sherwood Cross, Feniton	225+	6	This, overall, is a very substantial site on the north-western side of the village. If developed in its entirety it would significantly extend the built form of Feniton extending someway outward into open countryside. The south-easterly field (it has a denotation of Feni_11), is being promoted for a development through a current planning application - 24/0431/MOUT - Outline planning application for up to 86 dwellings. In our assessment work Feni_11 was identified as having capacity to accommodate up to around 100 new houses. As a stand-alone site option it has limited direct constraints though is in an open and quite exposed option.	No
Feni_01	Land at Feniton forming part of Sherwood Farm	46	6	This site on the western edge of the village, south of the railway, was identified as having potential for around 46 new homes. It is a site that is bounded to the railway to the north on a comparatively narrow field that extends westward out of the village. Development could extend an existing small group of dwellings in a reasonably well contained land area, though if developed at the same density as nearby dwellings the yield would be some way lower than that indicated.	No
Feni_07	Lyndale, Feniton	60	6	This site on the eastern side off the village was identified as having potential for around 60 homes. However, flood alleviation works on the sites western edge may have reduced possible capacity. It is a well screened site to the south though to the east and north is more open in the countryside and if developed in full would extend the built form of the village some way in an easterly direction.	No
Feni_08	Land adjacent to Beechwood, Feniton	83	6	This was a site that was previously refused planning permission at appeal on the eastern side of the village. The appeal decision reflected on some sensitivities associated with development of this site but also noted that, taken in conjunction with site Feni_14 which was also considered at the same appeal, the scale of development that would come forward would be disproportionate to the scale of Feniton overall. It is a reasonable site in that it would build next to an area of comparatively recently built homes and it would not extend the built up edge of the village that much further eastward. We would not suggest allocating land to the south of the land at the southern side of the site and in excluding this land it would contain the development between to existing lanes in a location benefitting from some natural screening.	Yes For 83 new homes

Feni_10	Westlades , Feniton	36	6	This site lies on the eastern side of the village. It is formed from a large existing property and its grounds. The site is quite well screened but development would be to the north of an existing lane and if built it would extend the built form of the village in a westerly direction and into surrounding countryside.	No
Feni_14	Land off Ottery Road, Feniton	75	4	This site is quite open and exposed and westerly parts increasingly elevated. Development would extend the built form of the village in a south westerly direction some way into an increasingly open and exposed area of countryside. See comments in respect of Feni_08 as this site also featured at the same appeal.	No

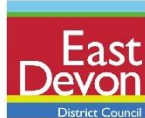
Sites at and around Hawkchurch

Hawkchurch is a comparatively small village in the Blackdown Hills National Landscape area that contains sufficient facilities to qualify as a Tier 4 settlement, albeit concerns were expressed at a previous meeting considering site allocations at Hawkchurch that the bus service is very limited.

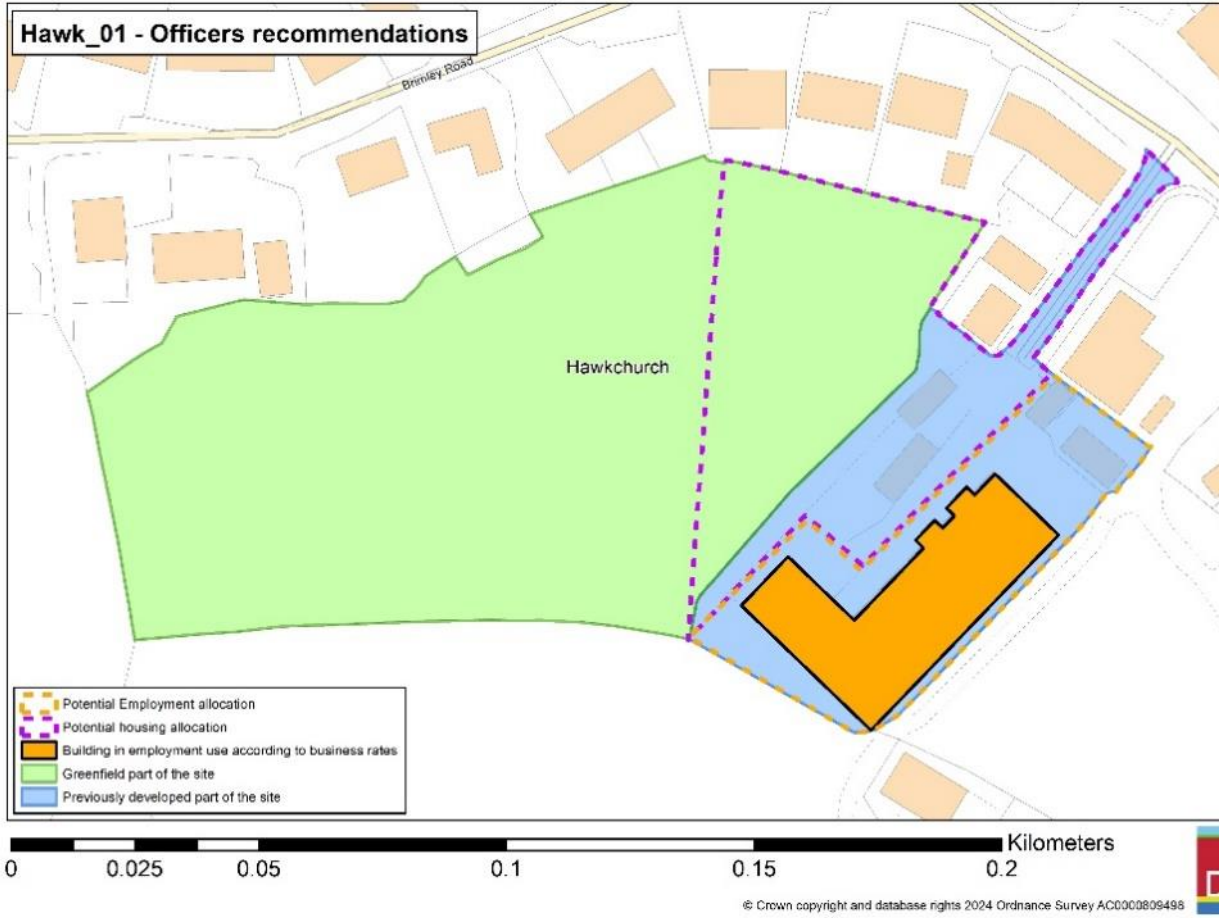
Allocated and Previously 'moved on' sites - Hawkchurch



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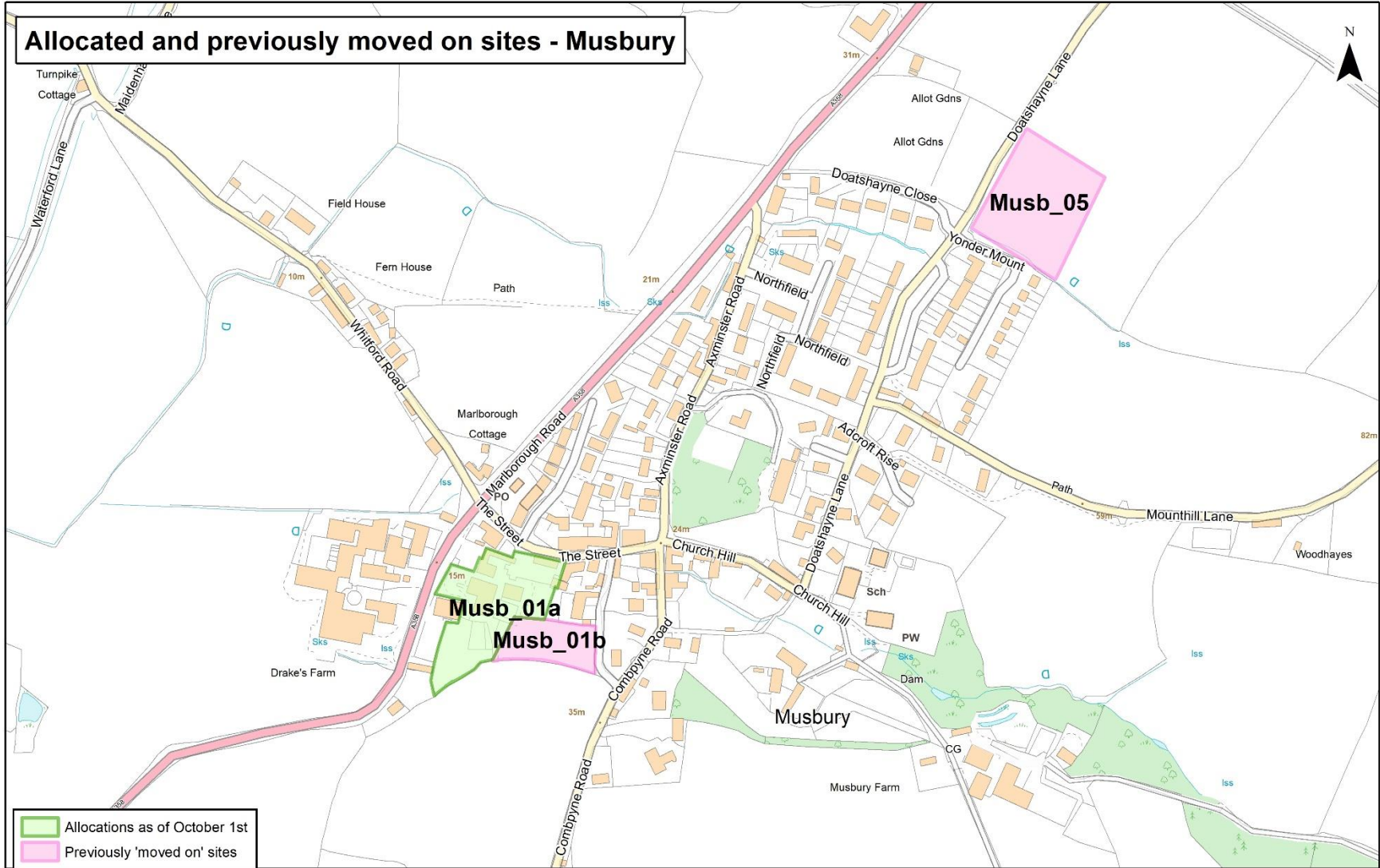
Site Ref	Site address	No of dwgs	Re a s o n No	Commentary on matters raised at committee (in italics) - with summary officer response or reference to stand alone commentary further in this report section	Officer recommends allocating
Hawk_01	Norton Store, Hawkchurch	38 Amended to 12 houses and 0.25ha of employment	1, 2,	<p>Members resolved to 'move on' from this site when considered at their meeting of the 20th September but there was support for a smaller allocation that retained land for the existing community shop.</p> <p>The previously developed part of the site consists of a range of farm buildings, the largest of which is currently business rated for storage so is in an employment use, and a community shop in a temporary building. Adopted and emerging policy resists the loss of employment uses and this is the only employment site in Hawkchurch, and is close to the village centre. Having regard to Members previous comments it is now recommended that a 0.25ha 'L' shaped section of the site be retained for employment use and the relocated shop building, and the rest of the previously developed site, with an additional triangle of land to the west, being allocated for 12 dwellings. An existing mature tree should be excluded from the development allocation. Given the village centre location, it would be appropriate for the houses to be at a reasonably high density, leaving space to ensure that employment and residential traffic are separated within the site and space for landscaping.</p>	<p>Yes</p> <p>For 12 new homes and 0.25 hectares of employment land</p>



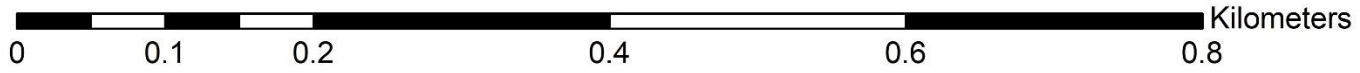
Sites at and around Musbury

Musbury is a small to medium Tier 4 settlement lying to the north of Seaton. It has, specifically for its size, a good range of facilities.

Allocated and previously moved on sites - Musbury



Allocations as of October 1st
Previously 'moved on' sites

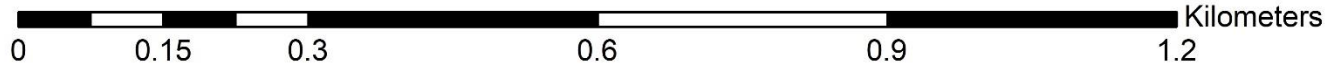
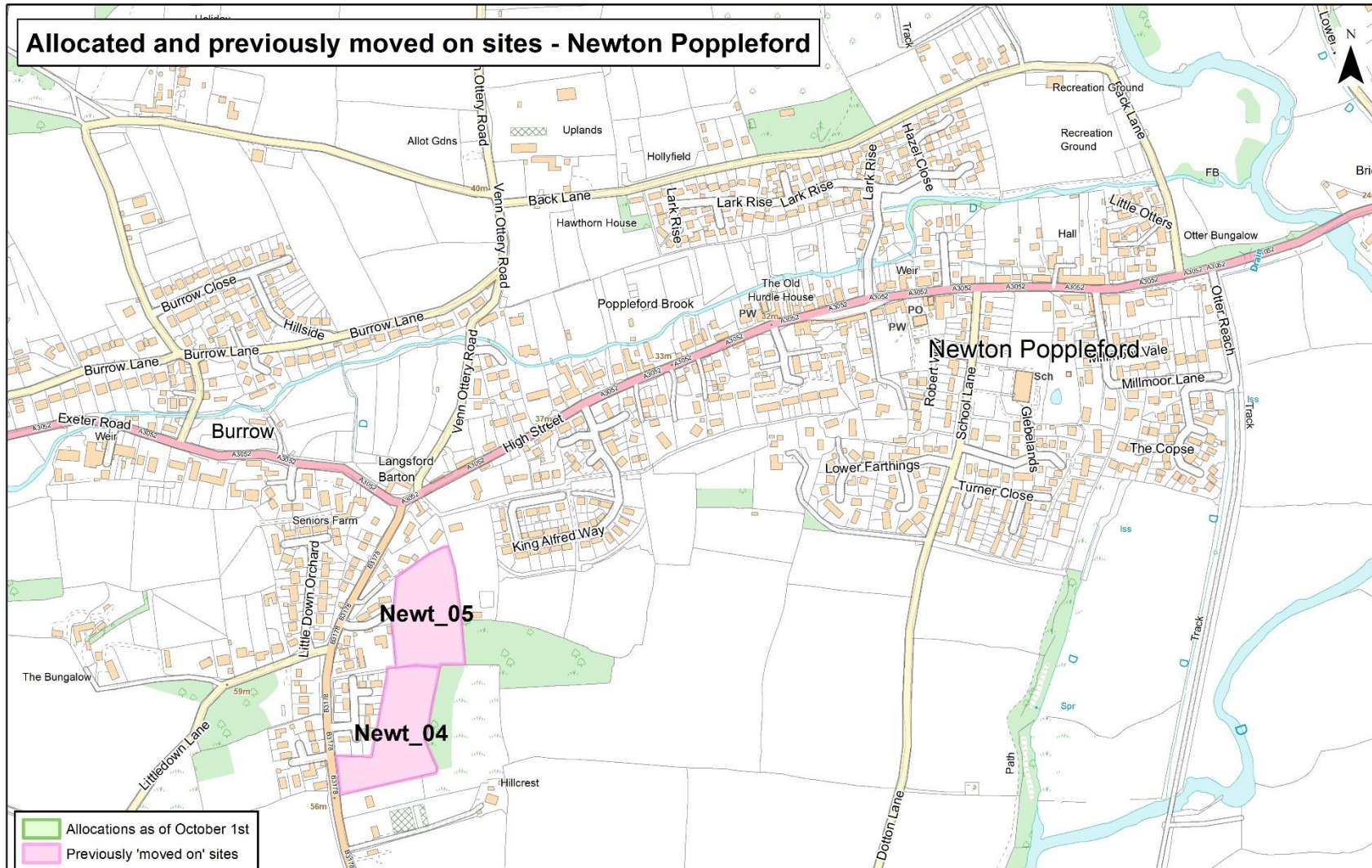


Site Ref	Site address	No of dwgs	Reason No	Commentary on matters raised at committee (in italics) - with summary officer response or reference to stand alone commentary further in this report section	Officer recommends allocating
Musb_01b	Baxters Farm, Musbury	8	4	Adjoins Musb_01a which was previously agreed for allocation and so it is worth considering whether a wider allocation would be appropriate. However the site is in the East Devon National Landscape and the landscape assessment was that there are clear differences in sensitivity between the majority of the site (Musb_01a) and the eastern field (Musb_01b), which is far more susceptible to change due to the landform and extensive views.	No
Musb_05	Land at Doatshayne Lane, Musbury	16	7	There was some support for this site indicated at the working group meeting, but a recent application (21/1656/MOUT) found that development on this site would result in harm to the East Devon National Landscape and was refused partly on this basis. The previous planning permission (17/0893/MOU) on the site (for up to 15 dwellings including 10 affordable) had been granted on the basis of the need for the affordable housing but has lapsed. The landscape assessment found that the landscape sensitivity of the site was high with the site forming part of an exposed sloping landscape that is visible for many miles across the valley. Development would extend the settlement into surrounding landscape and appear incongruent, to the detriment of the special qualities of the East Devon National Landscape.	No

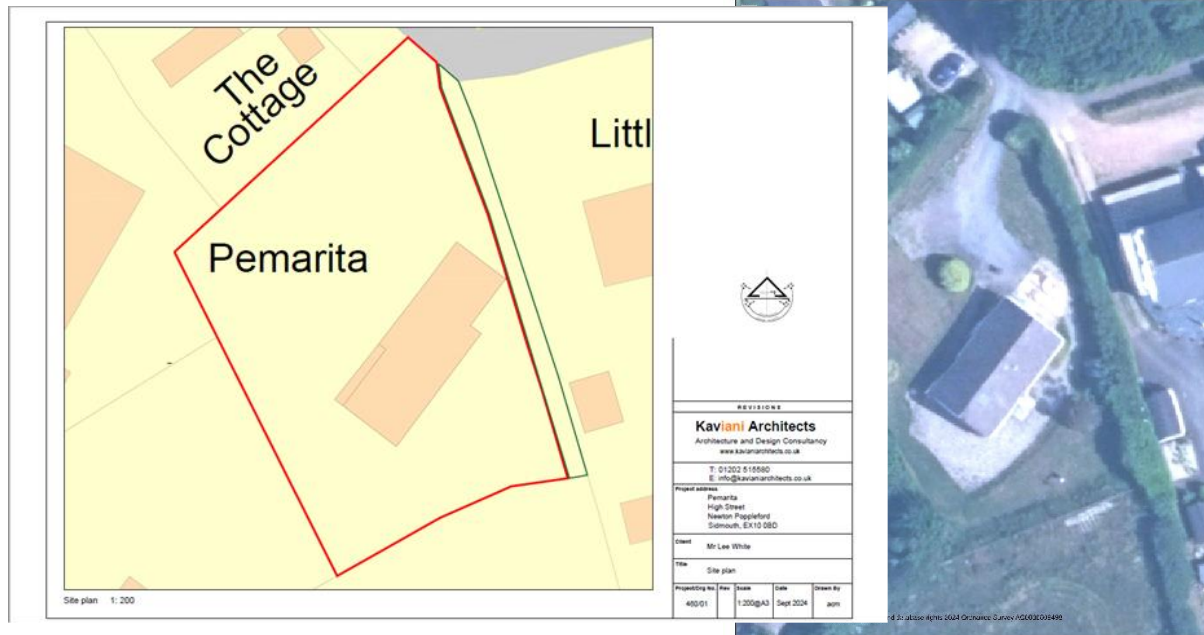
Sites at and around Newton Poppleford

Newton Poppleford is a Tier 4 settlement in the local plan and as such, in plan strategy terms as a local centre, it is an appropriate location for limited development to meet local needs. At present however, there are no sites allocated in the village but there are two sites identified that require further consideration. There were expressions of support for allocations and some development at the village at the working group meeting.

Allocated and previously moved on sites - Newton Poppleford



Site Ref	Site address	No of dwgs	Re a s o n N o	Commentary on matters raised at committee (in italics) - with summary officer response or reference to stand alone commentary further in this report section	Officer recommends allocating
Newt_05	Land to the east of Exmouth Road, Newton Poppleford	27	3, 7	<p>All of the sites considered in Newton Poppleford are located in the west of the village, whereas the services and facilities tend to be clustered in the east of the village. The A3052 runs through the middle of the village from east to west and lacks a continuous footway. There are some traffic free routes from the west of the village to services and facilities in the east, but they lack hard surfaces and lighting. The inadequacy of safe and convenient pedestrian and cycling routes have been highlighted in appeal decisions and in the Villages Plan the western part of Newton Poppleford is excluded from the settlement boundary on this basis.</p> <p>Following consideration of the sites by SPC, the landowner for site Newt_05 has advised that they have acquired a 2.5-metre strip of land to the East of Pemarita, joining the field to the south of Beach Close to Farthing Lane. The plan below shows the land concerned (the thin strip to the east of 'Pemarita' between the red and green lines. This can be compared to the aerial photo shown alongside.</p>	<p>Yes</p> <p>For 27 new homes</p>



Although the land purchased is 2.5 metres in width, most of this appears to be taken up by a mature hedge, although this appears to be a non-native evergreen variety. It is considered that a path could be formed to link to Farthings Lane but it would need to have at least 1.8m high fences on either side to protect the amenities of the adjacent gardens. The proposal does not address the issues with Farthings Lane itself which in places has a poor surface, lacks natural surveillance and is unlit, however the resulting route would be off road and would provide a route of only 400m to the heart of the village.

The most recent appeal (22/2779/PIP) where this issue was considered was determined in March 2024 and the Inspector said:

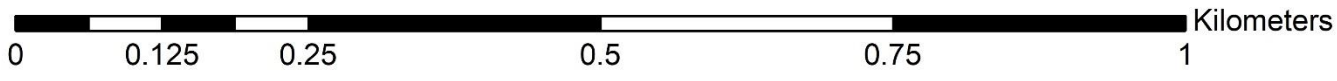
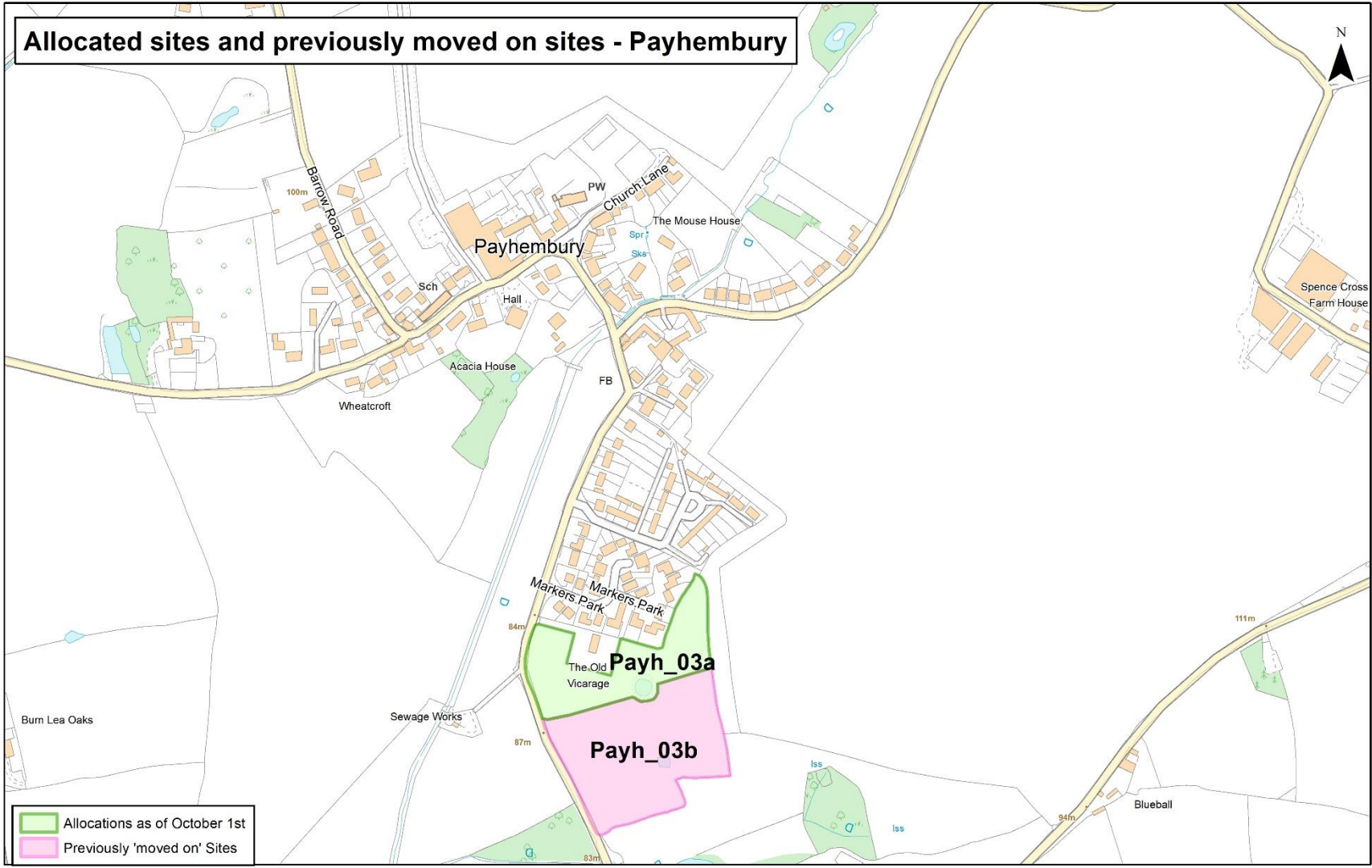
“The A3052 High Street is particularly well trafficked and narrow in places. It would not be an attractive proposition for cyclists since it is busy and for pedestrians, there

				<p>is no footway in places. There is a footpath which runs to the south of and parallel with, the High Street. This is unlit, largely unsurfaced and lacks natural surveillance such that it would not be particularly attractive nor accessible to all users. I walked the route indicated by the appellant in their statement, which diverts from the footpath into the new King Alfred Way estate. This section is paved and lit and for this reason I agree that some people would choose to take this route. However, this only by-passes a section of the footpath and does not address the concerns I set out above.”</p> <p>Although the concerns with the footpath were the only reason cited by the inspector for dismissing the appeal it should be noted that the site in question was off Downs Close and so residents would have needed to walk over 400m along the Exmouth Road to reach Farthings Lane making the route significantly more unattractive than that now proposed.</p> <p>Despite the remaining concerns about access to services overall this site performs reasonably well when considered against other sites within this report. With the proposed footpath link and in the absence of a better site to accommodate the growth needs of Newton Poppleford it is considered, on balance, appropriate to recommend the allocation of this site.</p>	
Newt_04	Land to the west of Badger Close, Newton Poppleford	28	3, 7	<p>The comments for Newt_05 also apply to this site with both sites having been promoted together. There is a judgement to be made here over the level of growth that is appropriate at Newton Poppleford particularly given its location within a National landscape.</p>	No

Sites at and around Payhembury

Payhembury is a Tier 4 settlement in the emerging local plan and as such, in plan strategy terms as a service village, it is an appropriate location to allow limited development to meet local needs. At present it has one allocated site for c.15 homes. There is also a mixed-use development for 8 homes and employment use under construction which is counted against the district housing requirements within this new plan period. This development is in the heart of the village, on the majority of a second HELAA site (Payh_01) which would have been Officers first choice for allocation, had it not already received consent. This current development and the allocation for a further 15 homes on Payh_03a combined accommodate a modest level of growth which is not considered unreasonable given the nature of this being one of the smaller Tier 4 settlements, accessed by a network of narrow lanes. However, there may be an opportunity to increase/revise the payh_03a allocation to include more

of the original site submission within the allocation.



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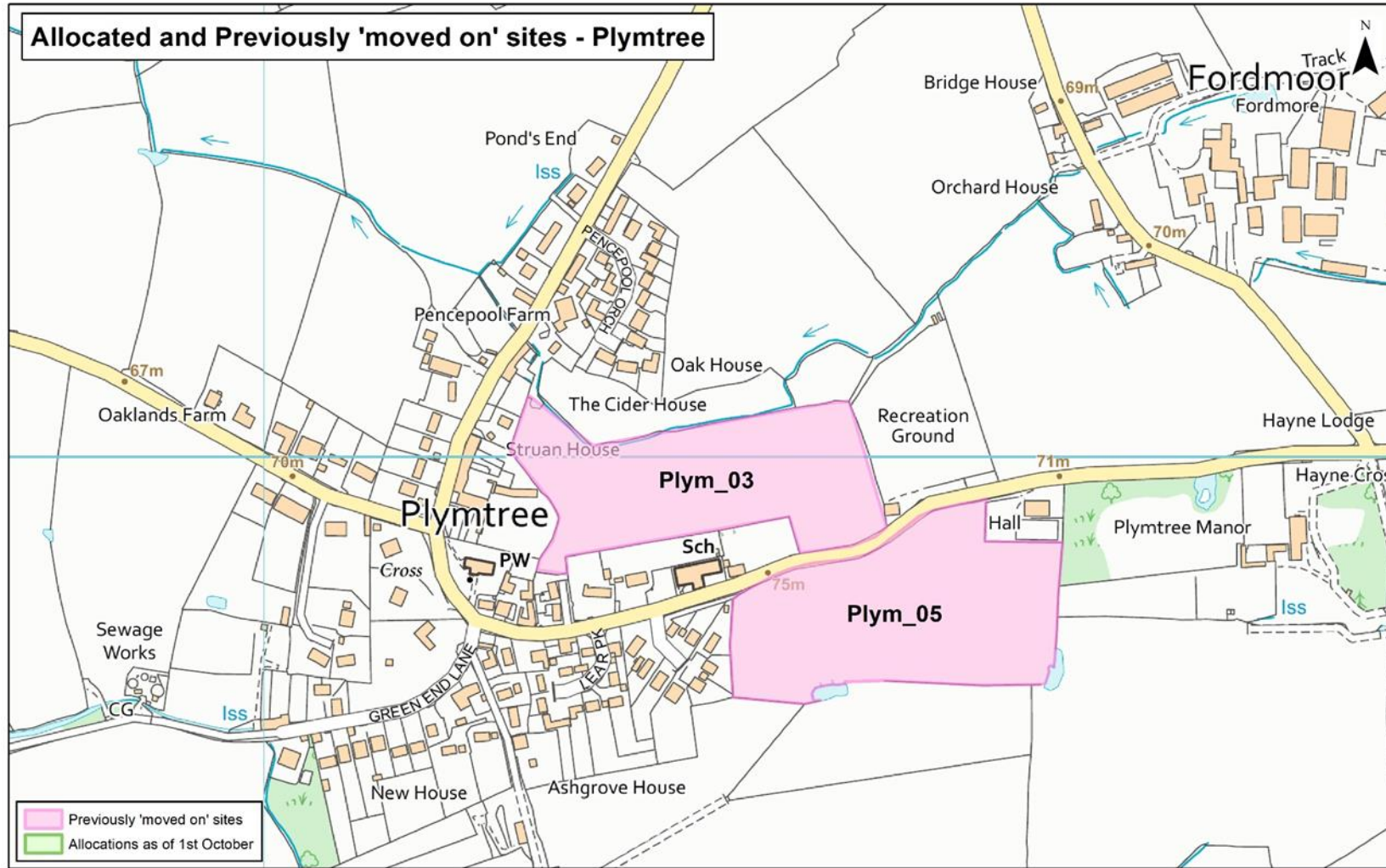
Payh_03 b	Markers Park, Payhembury	30	5	<p>The original site submission was for the entire area of 03a and 03b combined. Members agreed after much debate to allocate a northern portion of the site marked as 03a, for 15 units, as per Officer recommendation, whereas full site yield (03a & 03b) is up to approximately 65 dwellings (mid yield 50). There are options to potentially increase the yield here. The number of dwellings could be increased within the current identified area of Payh_03a as using the HELAA density standards (based on 30 homes per hectare on 80% of the total site area), Payh_03a, as already allocated, could potentially accommodate up to 29 dwellings. The adjoining estate is laid out at a slightly lower density and applying would give a more mid-range figure of 23 dwellings. However, the limited number of 15 dwellings was suggested following discussions with the Parish Council at the Member Working Group, to help deliver a proportionate level of growth. Officers were also seeking to accommodate the pond/marl pit into the design.</p> <p>Consideration could also be given as to whether there is merit in extending the area of the allocation southwards beyond the existing extent of the 03a area, with the pond/marl pit becoming more central to the site as indicated on the aerial image shown below (or similar).</p> <p>There is flexibility within this site as there is no existing hedgerow separating 03a and 03b. On standard HELAA density calculation the larger area could accommodate 45 dwellings. Continuing the lower density of the adjoining estate and allowing for robust boundary landscape screening would accommodate c. 36 dwellings.</p> <p>Since site Payh_03a was agreed for allocation at SPC, further comment has now been received from Devon County Council as Highways Authority. The advice is that the, <i>“Approach roads [are] of mixed width. Modest development may be acceptable. Opportunity to provide NMU [non-motorised users] infrastructure to make the scheme accessible to wider network, however absence of footways towards the school for a period is noted.”</i> Also, observed that there are, <i>“Limited bus services in the village; shopping trip to Honiton three days a week and Exeter once a week. Based on the number of dwellings it is unlikely that it will be possible to fund sustainable improvements so the development would be primarily car dependent.”</i></p> <p>A larger scale scheme here would still not be expected to be sufficient to fund bus service improvements and so the updated County Highways comments continue to</p>	No
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			<p>apply to all options. Distance to facilities increases by extending the allocation further to the south, but it is still less than 0.7km from the southernmost boundary of 03b to the village centre, and well within the 1600m rule of thumb for all amenities. Although, as DCC observe, the pavement is not continuous to the school (and other facilities) due to the historic road network.</p> <p>This is also a visually prominent 'gateway' site to the village from the south and there are some heritage/ecology/landscape sensitivities - but none that cannot be mitigated through site layout and design. The site and village are not within the National Landscape. The main consideration is therefore one primarily of scale given that this is a smaller tier 4 settlement dependent on access by narrow lanes in / out of the village (particularly to the north), with partial pavements, and limited public transport to main centres.</p> <p>Ultimately, this is a planning judgement on what is an appropriate level of growth for this settlement given its characteristics and its place in the settlement hierarchy.</p>	
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Sites at and around Plymtree

Plymtree lies in a westerly part of East Devon, it is a Tier 4 settlement with a range of facilities.

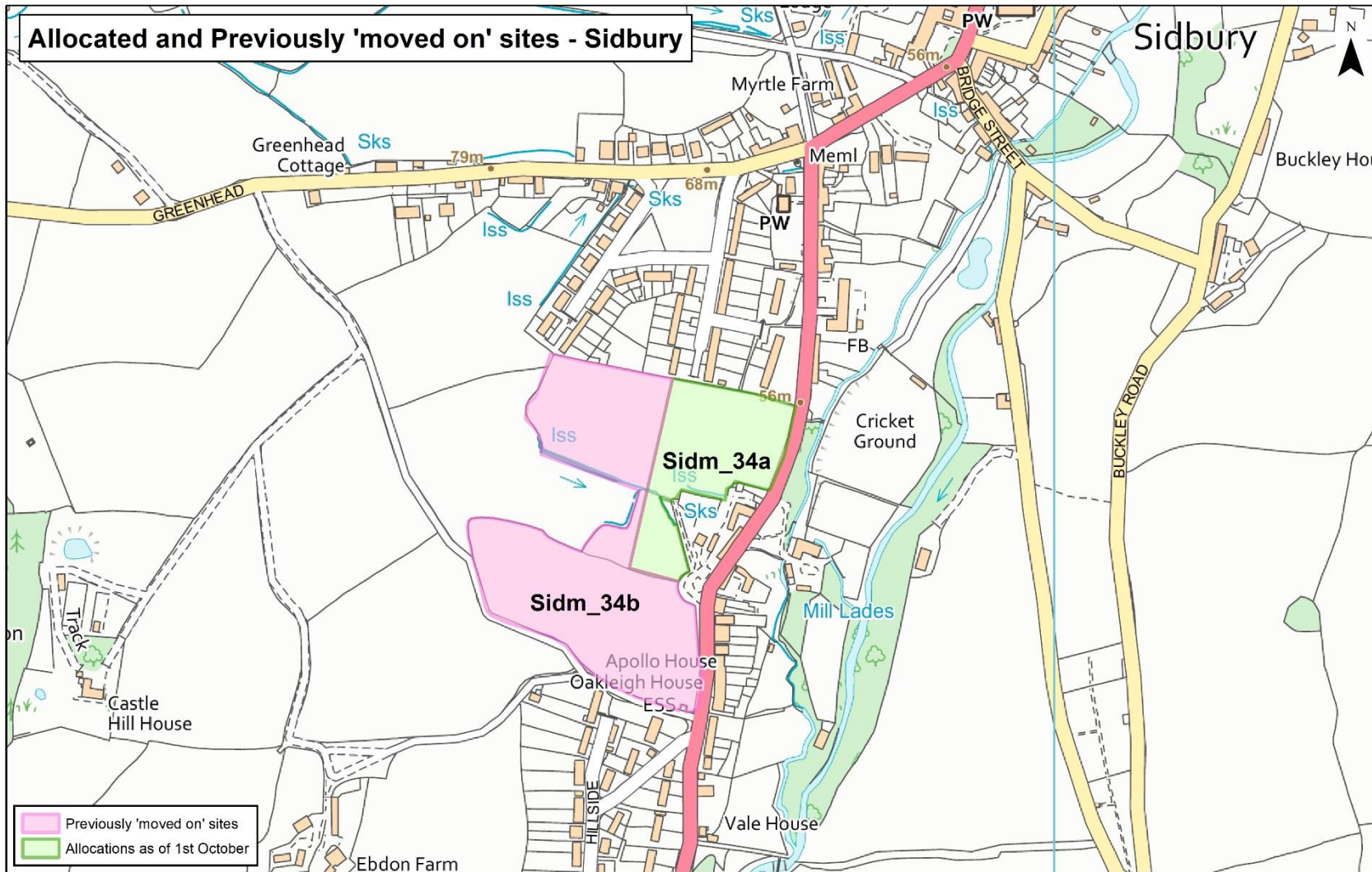


Plym_03	Land at Plymtree (north of the school)	30	5	<p>SPC agreed to allocate but only for 15 units.</p>  <p>Although this site could accommodate 43 dwellings the total was reduced to 30 to allow for a scheme which protects the setting of the historic assets around the site. The current application 23/1247/MOUT is for up to 30 houses and includes a community building/shop, school car park, footpath links to local facilities, village green and affordable housing. The only vehicle access point to the site is at the eastern end (see yellow arrow), therefore an allocation of 15 dwellings (up to the blue line) would create a small housing estate with an area left over which is likely to be infilled with a further small estate in future. 15 dwellings will not deliver the considerable community benefits that the larger, 30 house scheme is proposing. On balance, a comprehensive scheme which minimises harm to heritage and delivers community benefits is considered to be the preferable option.</p>	<p>Yes</p> <p>For 30 new homes</p>
Plym_05	Land west of the village hall, Plymtree	43	4	<p>Site is opposite Plym_03 previously agreed for allocation for 15 units. Given that Members felt 30 houses were too many for Plym_03 it is not considered that a more comprehensive development to include an extra 43 houses on this site would be acceptable. There are around 115 houses in the village (not Parish) at the moment. An increase of 58-73, rather than 15-30, would be overwhelming. The very narrow lanes (immediately accessing the site and in the wider area), the extension of development to straddle the road and the lack of community benefits mean that Plymtree would expand to an unacceptable extent without any gains to outweigh the harm.</p>	<p>No</p>

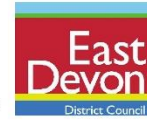
Sites at and around Sidbury

Sidbury is a Tier 4 settlement in the local plan and as such, in plan strategy terms as a service village, it is an appropriate location for limited development to meet local needs. At present, part of one site (Sidm_34a) has been allocated in the village with the remainder of the site (Sidm_34b) to be discussed.

Allocated and Previously 'moved on' sites - Sidbury



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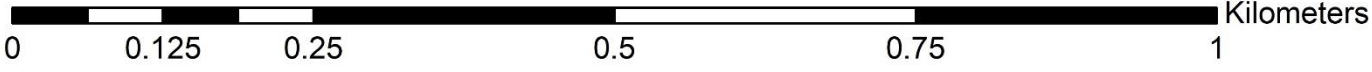
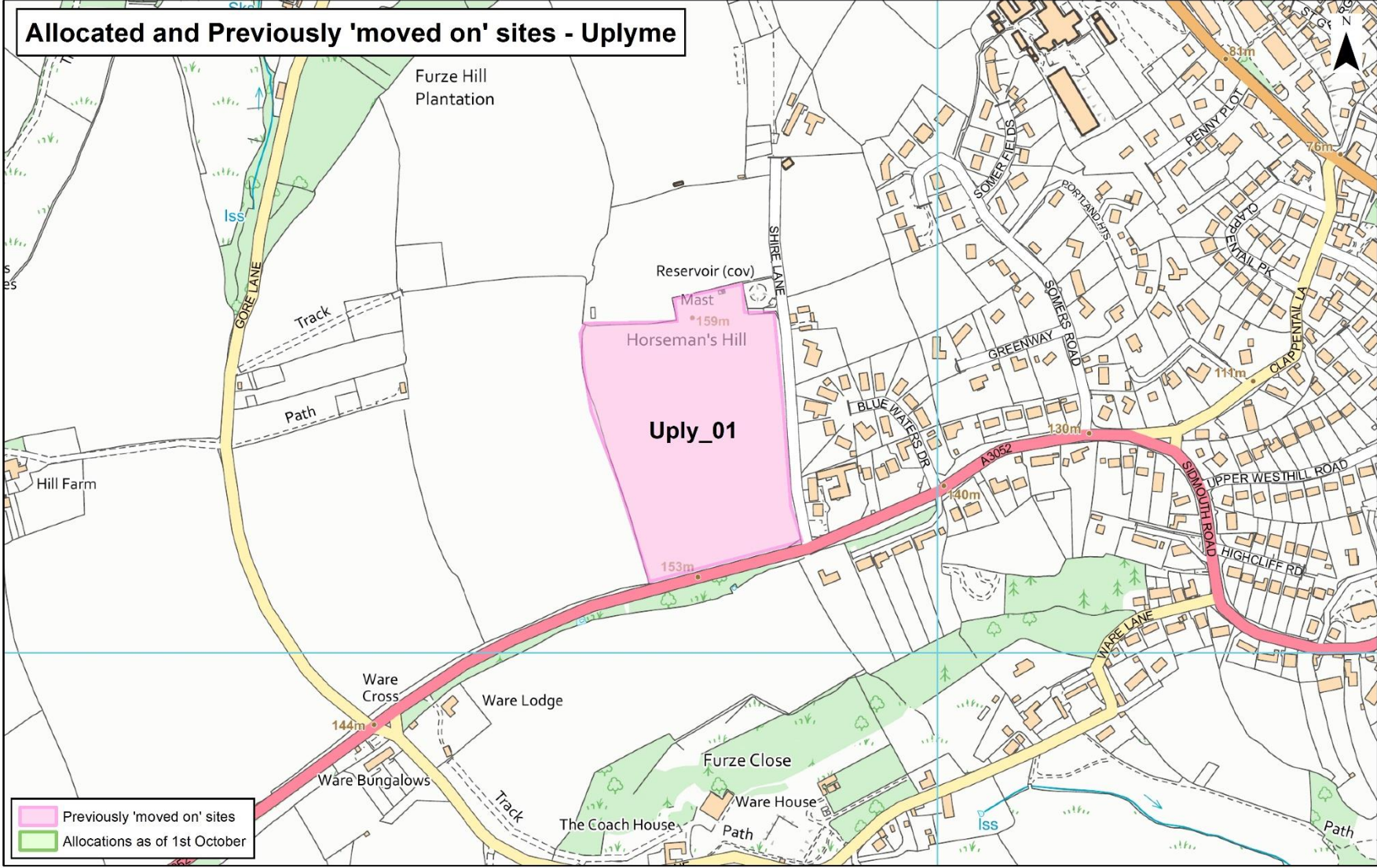


Sidm_34 b	Land between Furzehill and Hillside, Sidbury	38 to 43 (Sidm_34 as a whole)	4	<p>At the SPC Site Selection meeting, members agreed to allocate Sidm_34a but it was thought worth reconsidering the larger site (i.e. Sidm_34a and 34b) as a whole. A <u>draft masterplan</u> covers a greater extent of the site but leaves the most visible parts free from development (i.e. areas most susceptible from a landscape point of view).</p> <p>LVA Planning will shortly be submitting an outline planning application for the delivery of 43 homes across both Sidm_34a and Sidm_34b. A LVA representative said: “You will note from our representations to the various stages of the draft Local Plan that we have been promoting the whole site and not just the northern field (Sidm_34a). All of our technical work which will support the application demonstrates that the whole site is capable of accommodating a small uplift in the overall housing figure from 38 to 43, and it allows a similar scale of development to be spread across the whole site allowing for a suitable density but also maximising the use of land already identified as part of the draft Local Plan process.”</p> <p>LVA recently presented their proposals to Sidmouth Town Council and explained that the whole site is being brought forward in order to help address the need for more housing across East Devon as a whole, but specifically to help address the local housing need in the area. The application also delivers Phase 2 of the DCC multi-use path through the site, enabling the delivery of the entirety of the route from Sidford to Sidbury.</p> <p>This scheme would be accessed via A375 and not Furzehill (which would instead be a pedestrian / cycle access only). LVA says this is supported in principle by DCC Highways, and that the technical work which supports the planning application will help to explain this.</p>	Yes For 43 new homes
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Sites at and around Uplyme

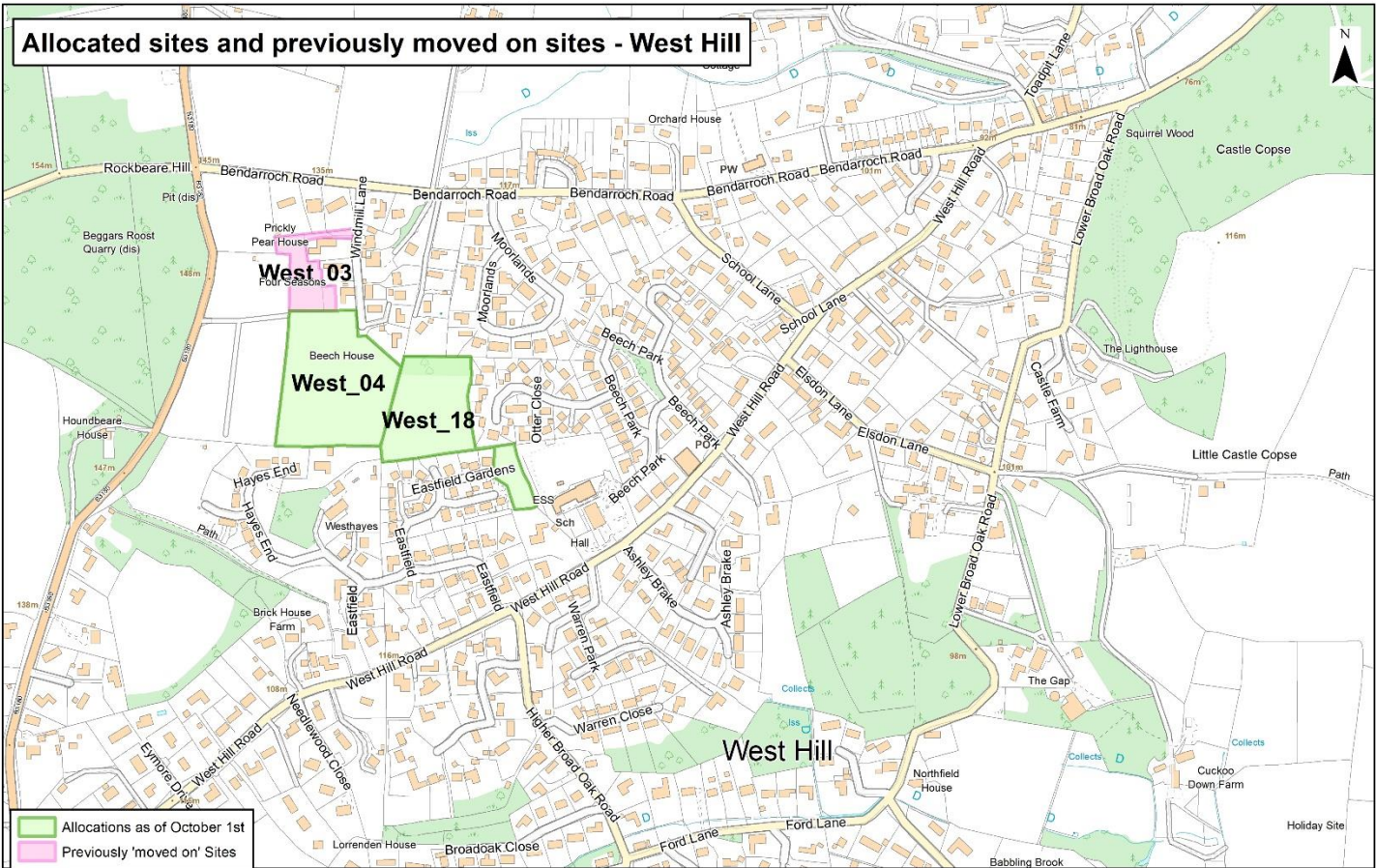
Uplyme is a Tier 4 settlement in the local plan and as such, in plan strategy terms as a local centre, it is an appropriate location for limited development to meet local needs. At present however, there are no sites allocated in the village but there was some support in the working party for the one site under consideration.

Allocated and Previously 'moved on' sites - Uplyme



Uply_01	Land at Sidmouth Road, Uplyme	92	7	<p>This site is located on the edge of the town of Lyme Regis (the lane to the east forms the county boundary). It had some support at the working group meeting. The site is not however considered to be suitable for allocation due to its poor access to services and facilities and the landscape impact. It is a large site within the East Devon National Landscape.</p> <p>The landscape assessment concluded that this 'is a highly visible site in the national landscape when approaching the town from the west – at this point the town is largely hidden from view due to a drop in land levels and vegetation. Overall landscape sensitivity is high – the site is unable to accommodate the relevant type of development without significant character change or adverse effects'.</p> <p>In terms of accessibility, there is a very steep gradient and no continuous footway from the site to access services and facilities in Lyme Regis town centre. In terms of access to facilities in Uplyme, although these are within 1200 metres in a straight line, pedestrian access is either across fields or along busy and or narrow roads which lack continuous footways. The site is therefore not favoured for allocation.</p> <p>It should however be noted that in commenting on the Local Plan at Regulation 18 stage Dorset Council commented that “Lyme Regis is very constrained both through designations (such as the AONB) and through land instability. As such, limited opportunities exist at the town to meet its needs both for employment space and for homes. There should be consideration of the opportunities in the vicinity of Lyme Regis to help meet the needs of the constrained town. Sites well related to the town may have the potential to help meet its needs especially for affordable housing and these may be more suitable than sites within Dorset”. We have however received no evidence to suggest that there are not better sites available within Dorset.</p>	No
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<p><u>Sites at West Hill</u></p> <p>West Hill is village with extensive tree coverage and with many homes built in the 20th century set in large gardens. The main village facilities are loosely grouped in a northerly part of the village.</p>	
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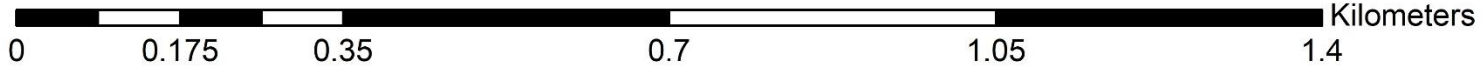
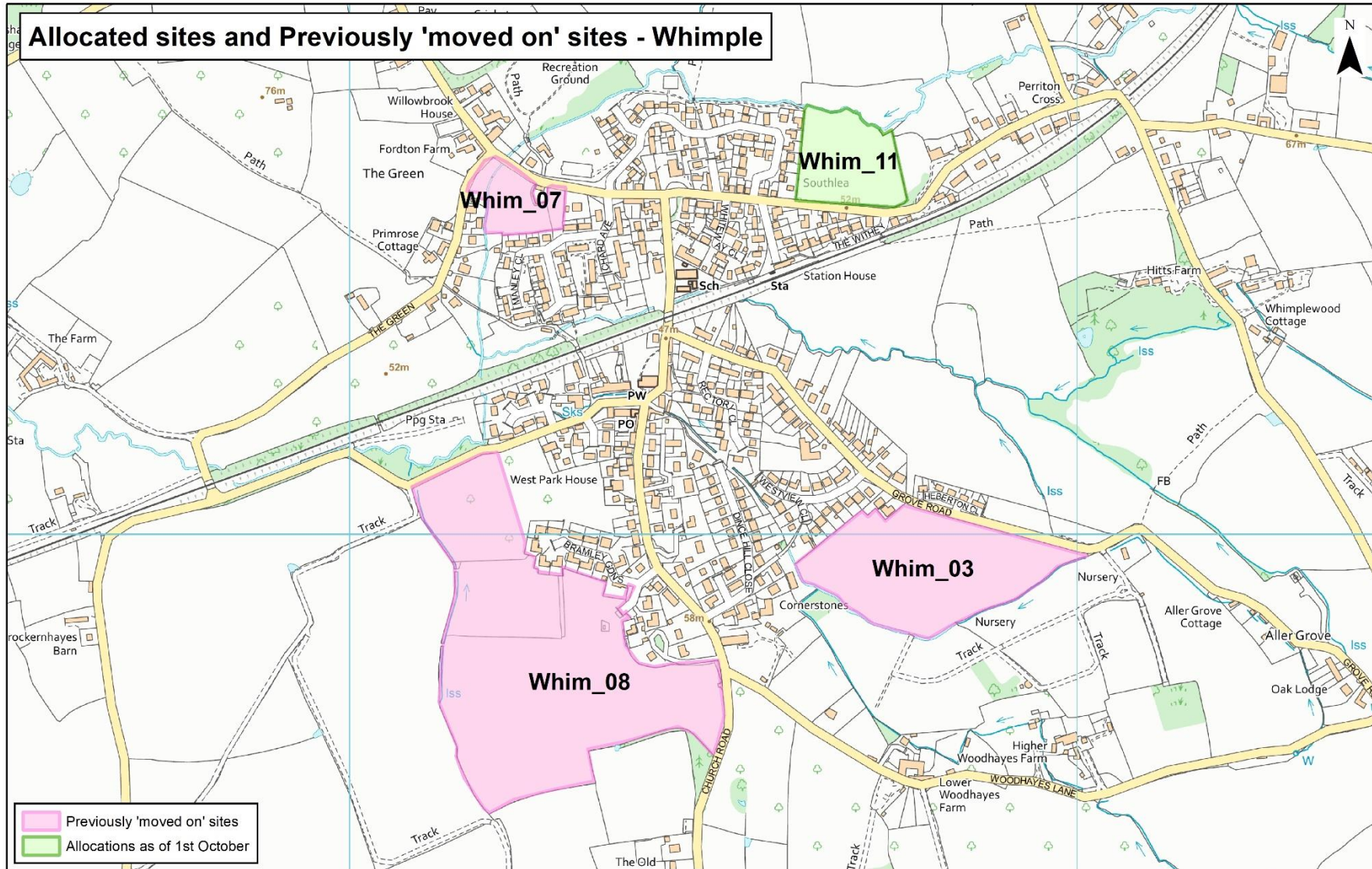
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West_03	Rear of Hasta-La-Vista, Windmill Lane, West Hill	5	4	<p>Adjoins preferred allocation West_04.</p> <p>Not recommended for allocation due to difficult highways access off Windmill Lane with limited visibility; route to community facilities lacks pavement and street lighting along most of the route (although this will be improved if West_04 and 18 are developed to the south); and sensitive landscape with limited context of built form.</p>	No
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Sites at and around Whimble

Whimble is a Tier 4 settlement in the local plan and as such, in plan strategy terms, it is an appropriate location for limited development to meet local needs. There is a proposed allocation that is roughly proportionate to the scale of development at the village (Whim_11). Like Feniton, it is a village with a number of promoted sites that perform comparatively well compared to settlements in the national landscapes, although Whimble has more heritage constraints than Feniton and flooding issues, from watercourses as well as surface water, may limit development options. Work on the Strategic Flood Risk Assessment found that many of the potential development sites would require modelling to understand the nature and extent of flood risk. If Whimble is considered to be suitable for larger scale growth, further work on flooding would be required and, like Feniton. There is insufficient time to do this modelling prior to a Regulation 19 consultation to start at the end of this year and it would be a costly exercise. However, this further work could be done and the evidence added in at a later stage.

Allocated sites and Previously 'moved on' sites - Whimble

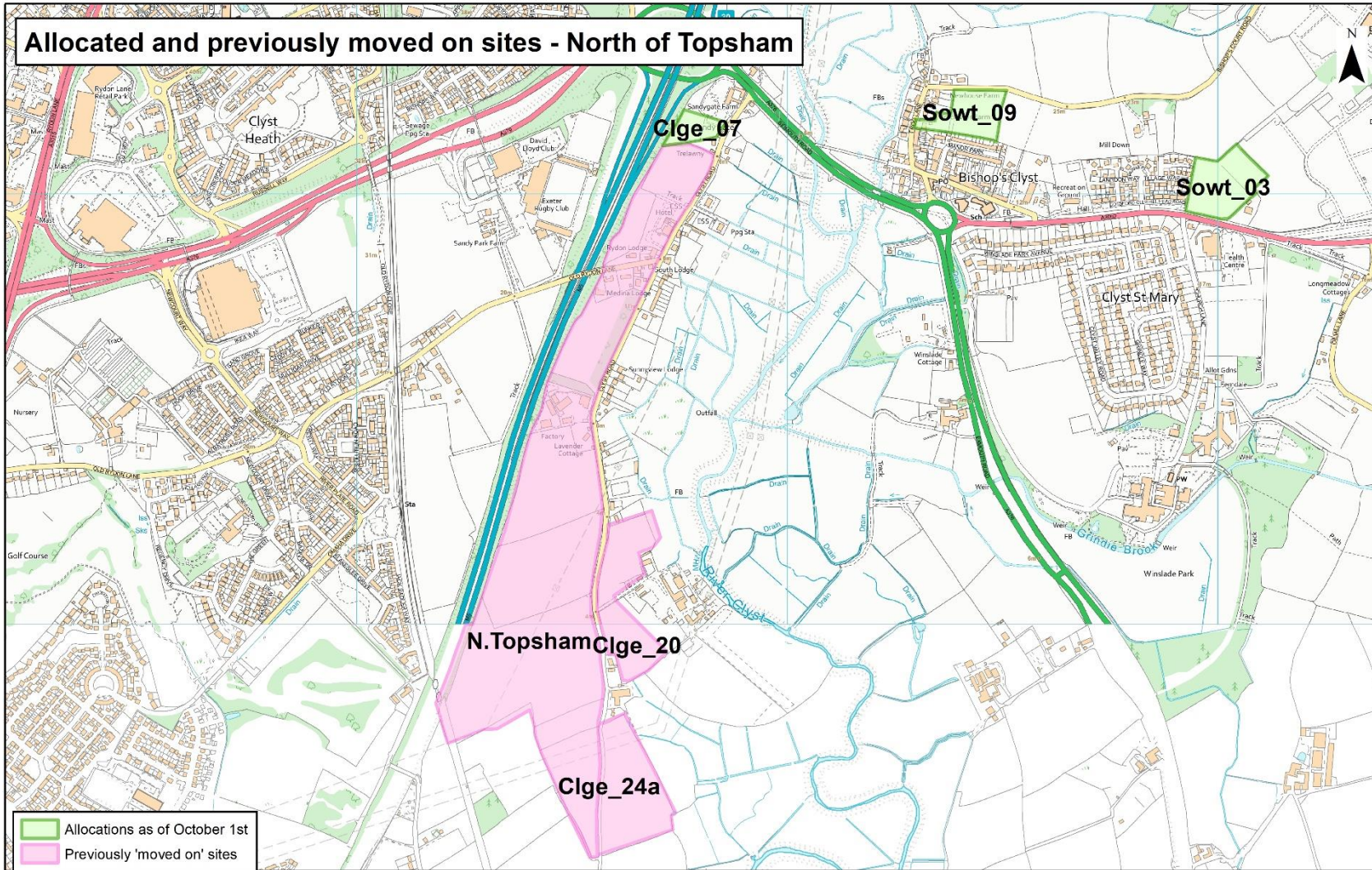


Whim_03	Land to the south side of Grove Road	30?	7	This site was identified as a credible option at the Working Group perhaps as a smaller scale development on the Northern part accessed off Grove Road. There was not sufficient time to consider this further before the committee meeting. The allocation of a smaller site had however previously been discounted because, although some issues may be resolved by reducing the scale of development, a level 2 SFRA would be required to understand the nature and extent of flooding, and this would require modelling.	No
Whim_07	Land at Broadclyst Road	10	7	This site is within the green wedge, most of it is at risk of flooding and there are heritage and ecology constraints. It may be possible to mitigate impacts and for a small part of the site to be developed, but a level 2 SFRA would be required to understand the nature and extent of flooding, and this would require modelling.	No
Whim_08	Land adjacent Church Road and Bramley Gardens, Whimble	50?	7	This site was not recommended for allocation due to concerns about the scale of the development in relation to the village (the yield of the whole site is 178) and concerns about the landscape impact on the attractive entrance to the village. The heritage assessment found that there would be a detrimental impact on the setting of a listed building, which could be mitigated through not developing the southern part of the site. It was one of the few sites in Whimble not identified as needing a SFRA level 2 assessment to understand the nature and risk of flooding (although there are some areas of flood risk within the site). It should be noted that a sequential test for flooding is needed to justify the proposed allocation at Whim_11.	No

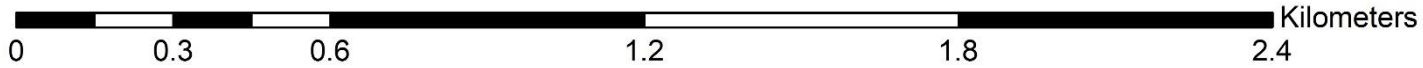
Sites north of Topsham

The north of Topsham site has capacity to accommodate an estimated 580 dwellings. It is recognised that this site raises a number of challenges, but also very real opportunities, as such a dedicated section of this report, below this table of site specific is included in this report.

Allocated and previously moved on sites - North of Topsham



- Allocations as of October 1st
- Previously 'moved on' sites

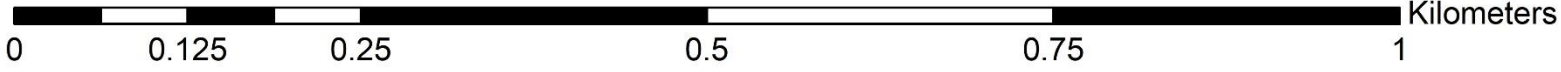
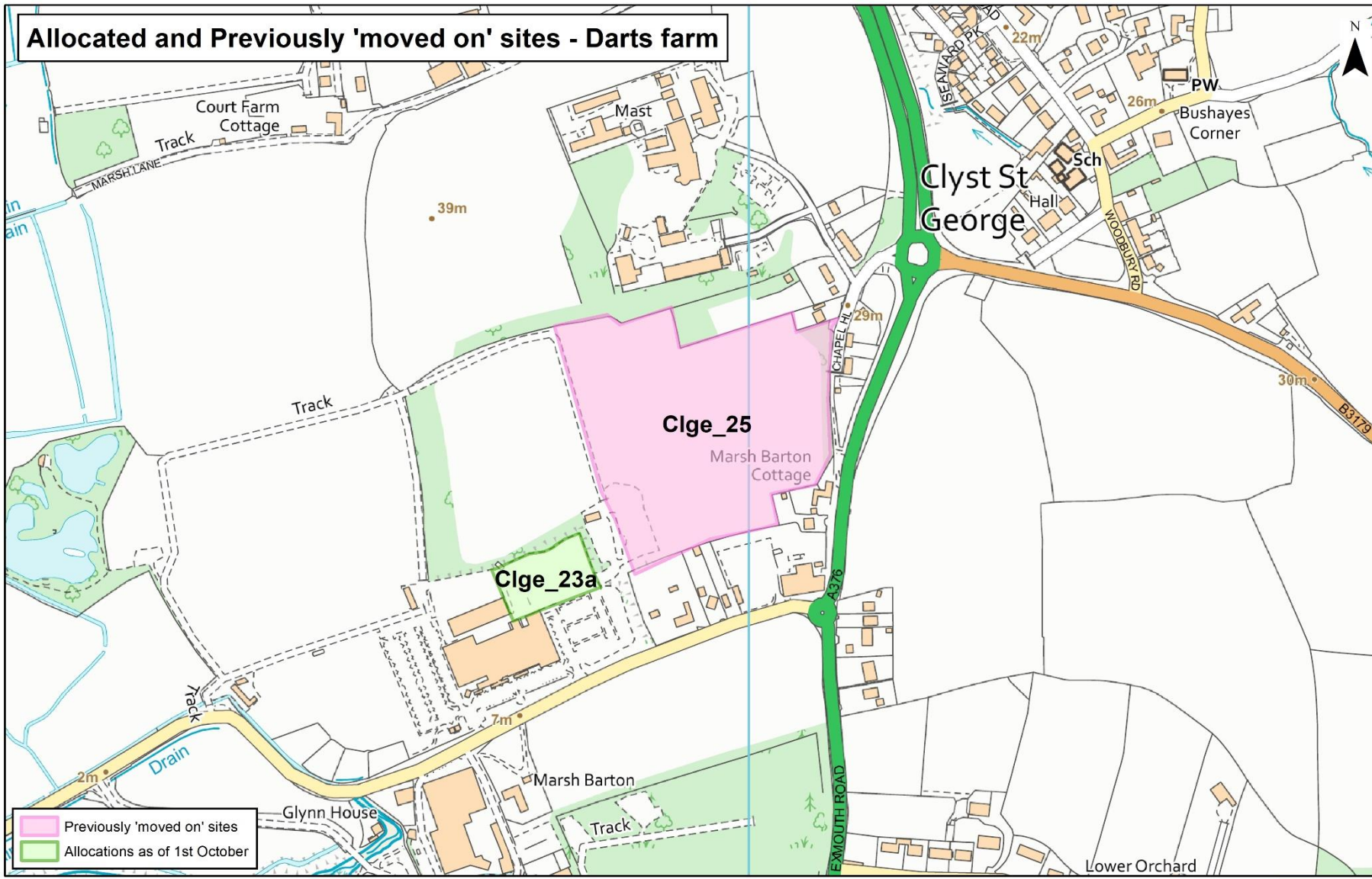



N. Topsham	Development next to the M5 and North of Topsham	510 +2.4ha employment land etc	1, 2	<p>See detailed commentary in the text further on in this report. In summary the site is identified as appropriate for allocation for development. There are some facilities in good close proximity of the site a wider range within the city boundary and within 1,600 metres distance of parts of the site. This also applies to Clyst St Mary facilities in East Devon.</p> <p>There is, however, an identified need to secure additional facilities in association with development north of Topsham. In particular we would highlight need for a new primary school and we have held discussions with Devon County Council and Exeter City Council around this matter, noting cross-boundary needs and opportunities for positive cross-boundary planning. We would recognise that securing public transport to directly serve this site could be challenging, though is clearly desirable.</p>	<p>Yes</p> <p>For 510 new homes</p> <p>Plus supporting uses</p>
Clge_20	East of Clyst Road, Topsham	46	1,2	See commentary above and further in in this report.	<p>Yes</p> <p>For 46 new homes</p>
Clge_24a	Clyst Road, Topsham	40	1,2	See commentary above and further in in this report.	<p>Yes</p> <p>For 40 new homes</p>

Sites at/near to Darts Farm

Darts Farm, south west of Clyst St George village, is a large retail complex with associated and nearby businesses. Land has been promoted for employment uses at and around Darts Farm.

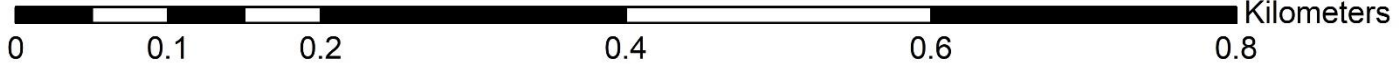
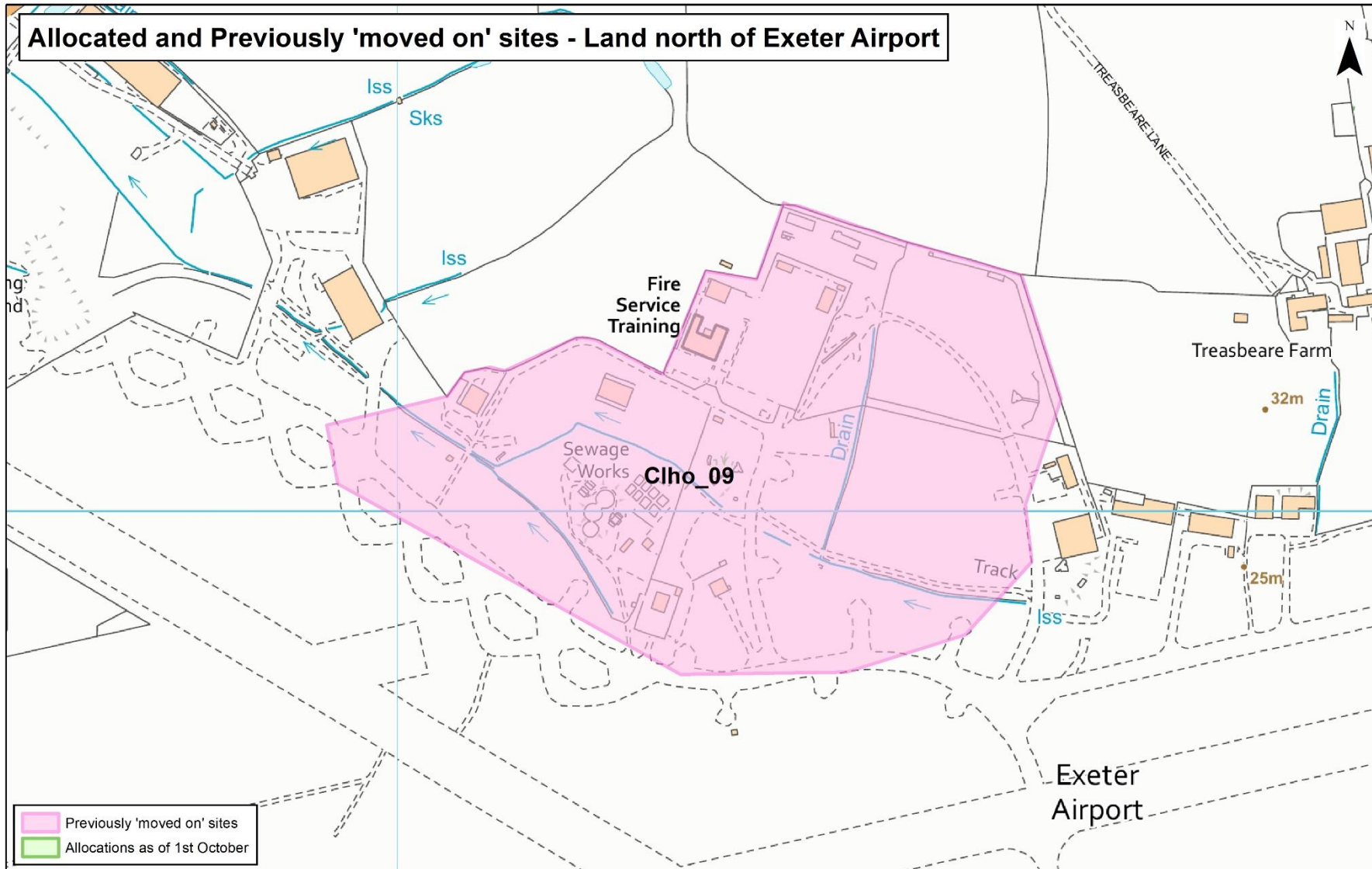
Allocated and Previously 'moved on' sites - Darts farm

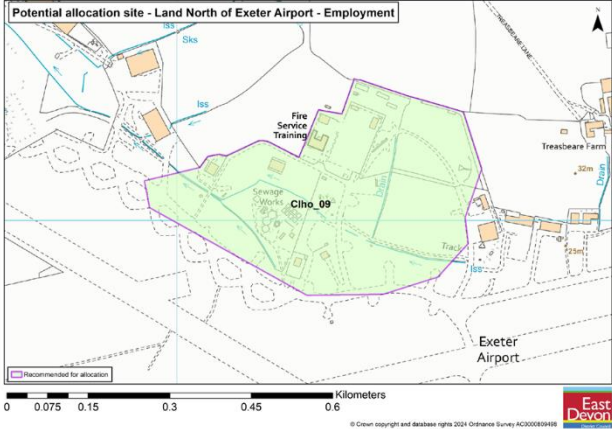


Clge_25	Land adjoining Darts Farm, Clyst St George	N/A	2	<p>Members wanted to bring back to review a potential allocation of part of the southern part of the site for employment purposes. The southern part of the site, measuring 1.5ha, has a lower landscape impact than the remainder of the site which rises upwards to the north. It lies close to several residential houses. The whole site is Grade 1 agricultural land. There is no direct road access, so employment related traffic would need to use the field access to the south west, in front of or through the agreed allocation Clge_23a and through the existing customer car park. A SFRA would be required as there is an area of surface water flooding at this point.</p> 	Yes 1.5ha employment land
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<p><u>Land north of Exeter Airport</u></p> <p>Land north of Exeter Airport's runway is understood to be surplus to the operational needs of the airport.</p>	
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Allocated and Previously 'moved on' sites - Land north of Exeter Airport



Clho_09	Land north of Exeter Airport	N/A	10	 <p data-bbox="696 639 1317 740">part of the Treasbeare expansion and, during the plan period, it will lie in much closer proximity to new housing and other complementary uses. Recommend that it be allocated.</p>	<p data-bbox="1339 161 1890 300">Employment site for 15.3ha not previously reported due to uncertainty over access arrangements which is now resolved.</p> <p data-bbox="1339 308 1890 600">This site, measuring 15.3ha lies to the north of the airport and is currently used for fire brigade training. It has minimal landscape or ecology benefit (being previously developed airfield) but does have some heritage assets dating from the second world war, which could be planned around. Access to the site will be improved as</p>	<p data-bbox="1935 161 2123 373">Yes 15.3 hectares of employment land</p>
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Land at Redhayes – Phases 12 and 13 – Brcl 24 and Brcl 25

Land North of Blackhorse/Redhayes (Tithebarn Green/Mosshayne) is allocated for mixed use development in the current Local Plan. Outline planning permission was granted 12/1291/MOUT for the development of up to 930 dwellings, a new link road, employment area (B1a Use Class), park and ride facility, local centre/square, health and fitness centre, creche, public and private open space and car and cycle parking, together with landscaping and associated servicing (all matters reserved except points of access).

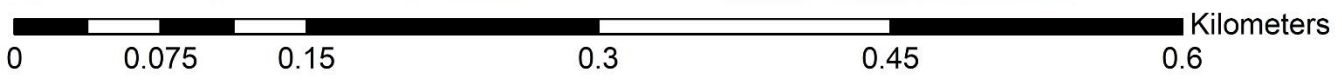
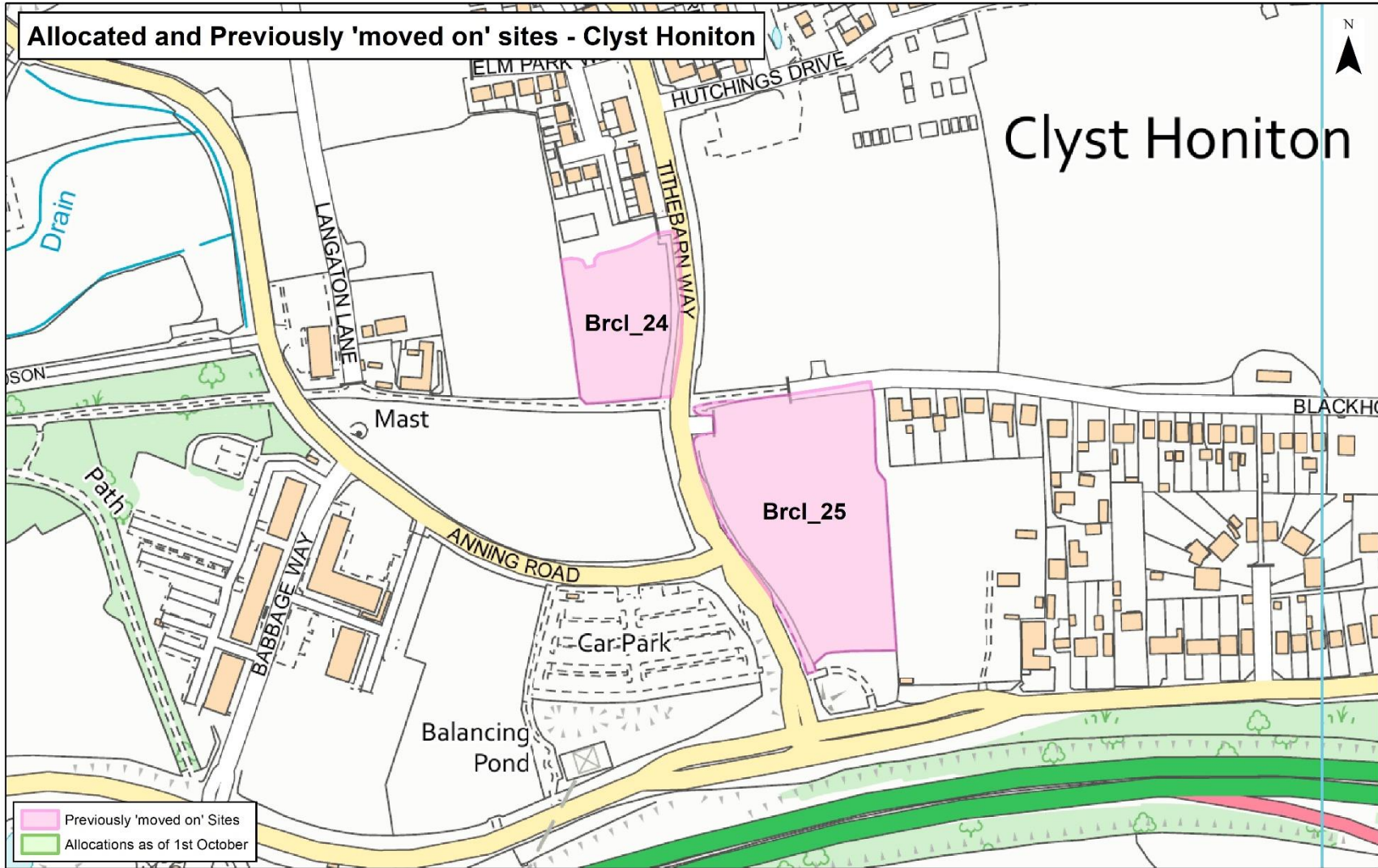
The majority of the outline application site has now been developed or is under construction however, parts of the site, including phases 10, 12 and 13 are currently undeveloped. They were granted planning permission for allotments, leisure and employment uses respectively. On account of a permission being in place these sites, specifically phases 12 and 13 (Brcl_24 and Brcl_25) were sifted out as a possible residential site development options, despite this being promoted by the agent for the landowner. Given that the agent has specifically promoted the land for residential use it is appropriate to give consideration to this potential.

The sites in question are shown on the map below.

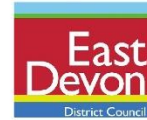
Allocated and Previously 'moved on' sites - Clyst Honiton



Clyst Honiton

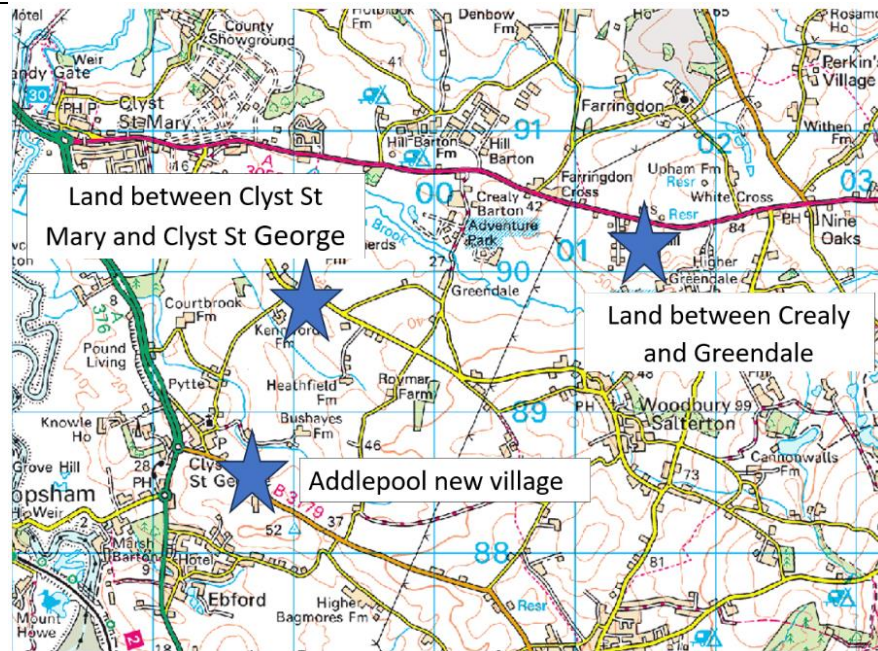


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Brcl_24 and Brcl_25	Land at Redhayes	60 approx combined	<p>These two sites have an existing permission for employment/leisure uses, this provision was made in conjunction with the granting of planning permission for residential development, they form uses that appropriate alongside the residential development coming forward.</p> <p>In local plan representation the agent acting for the landowner considers that the sites should be re-allocated in the new local plan. The agents advise of limited interest in the uses they were granted planning permission for and of other non-residential uses in proximity to the sites. The agents are promoting residential use of the land instead of leisure and employment.</p> <p>Whilst residential uses would add to housing supply such uses would adversely impact on potential for employment and job generating development. We have not seen robust evidence of marketing at these sites though we are aware of positive interest in employment development in this part of East Devon. Due to employment potential loss we would not recommend the allocation of this land for residential use, however it is considered appropriate for Members to consider these sites given the agents challenge to the sifting exercise and the need to find additional housing sites.</p>	No

<p><u>Sites that could accommodate smaller sized new settlements on the western side of the District</u></p> <p>There were three sites promoted on the western side of the district that could accommodate a substantial number of new homes in standalone larger scale developments. We bring these to committee attention as they fell within or close to areas of land assessed, but rejected, as locations for the new community. The locations are shown on the map below by the stars which fall approximately in the centre of land proposed by promoters for development.</p>	
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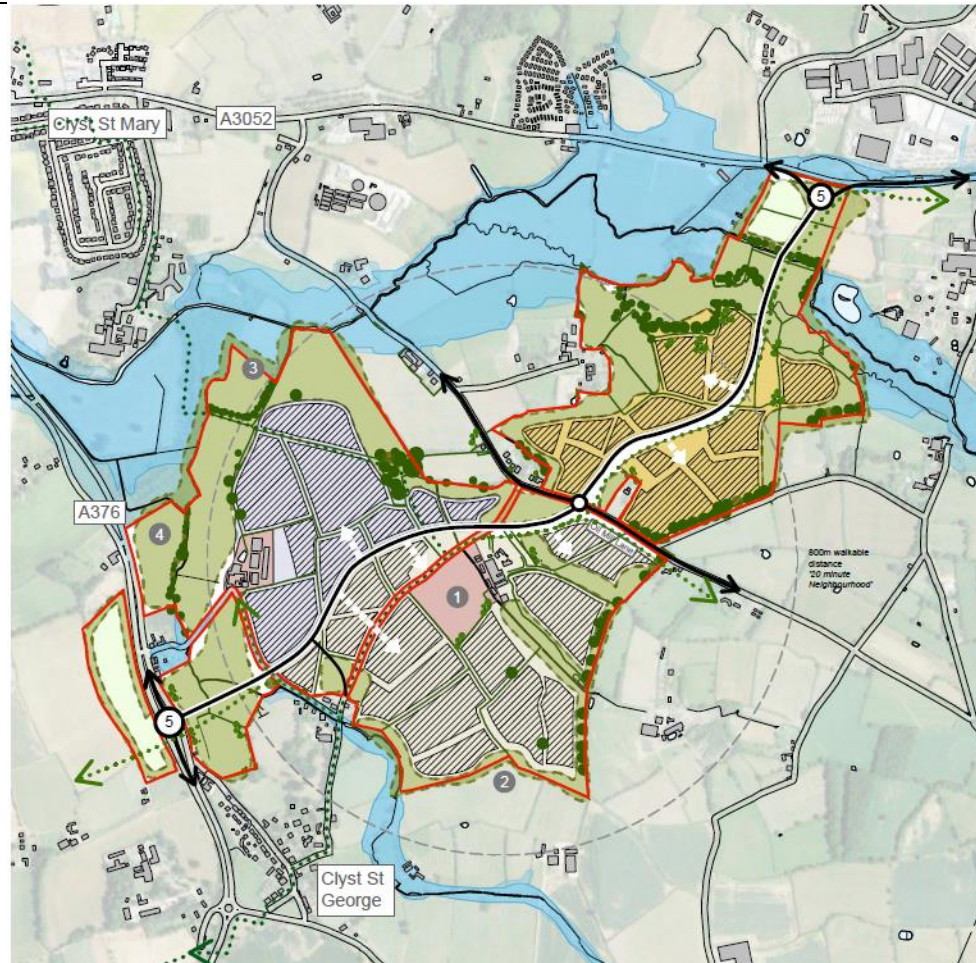


Each of these sites/proposals is commented on in more detail in the table below, but by way of general commentary they range in size from around 800 dwellings at Addlepool up to 2,000 dwellings for land between Clyst St Mary and Clyst St George. Land between Crealy and Greendale is being promoted for around 1,500 new homes. At these sizes these new settlements may be able to support some new facilities but there would be limitations. They would all certainly fall below the threshold at which a secondary school could be justified but the bigger two proposals would be in line with the scale of development that would justify a two-form entry primary school (that is a 420-place school based on 0.25 pupils per-dwelling). Addlepool would fall well below requirements, and whilst it would be close to a 210-place single-entry primary school threshold this is not a new school size favoured by Devon County Council as education authority.

Provision of other new facilities on all sites would be hampered by population size and it is suggested that provision maybe limited by lack of needs/demand generated as well high costs associated with infrastructure and its delivery and hence ability to fund social and community facilities. There is a distinct possibility that if developed what would be built would be essentially new houses, on big estates, in the countryside with few services and by implication high levels of car dependency.

Of potential greater concern, however, would be the inevitability of any one (or more) of these developments coming forward and competing with the already allocated new community and the impacts that could arise on slowing down development of the new community. Bringing forward the new community will be a challenging task, but rewards, in terms of housing delivery

<p>and commensurate delivery of infrastructure to deliver a truly sustainable new community will be great. A very real concern is that there would be insufficient market demand for new homes in this apart of East Devon, over the lifespan of the local plan, to see the new community and one or more of these developments coming forward for development.</p> <p>The proposals are on the western side of East Devon and thus relatively close to Exeter, in this respect they accord with a pattern of distribution of concentrating development in this broad part of the district. However, the plan strategy does not provide for development of settlements of this size and as such they are out of alignment with the broader plan strategy. We would advise that we have not consulted on settlements of this size, or of this nature, in consultation work nor tested key aspects of provision against service capacity considerations, for example highway capacity or impacts development would result in. Large parts of each of these sites formed part of the 3 options for the second new community and were consulted on in that context but as smaller stand-alone settlements they did not align with the agreed plan strategy and were sifted out through site selection work. However, for completeness and given the need to identify significant additional housing sites following initial consideration of allocations by the committee, it was considered appropriate to bring them to the committee .</p> <p>Commentary below is informed by technical new community work, see: Evidence Base and Supporting Documents - New Community - East Devon and specifically new community site appraisals: East Devon Options Appraisal Report.pdf</p>					
	Land between Clyst St Mary and Clyst St George	Around 2,000	9	At 2,000 homes the land between Clyst St Mary and Clyst St George is the largest of the proposed schemes. This option is understood to be promoted by a masterplan produced by the promoters which is reproduced below.	No



16 - STRATEGIC MA
 Land Between Clyst St.
 Parameter Plan

- Area For Consideration
 - Flood Zone 3
 - Flood Zone 2
 - Ecology Buffer
Creating and enhancing specific wildlife
 - Road Network
 - Cycle Routes (Including Clyst VI)
 - Development Zone A
Medium density average (X 32)
 - Development Zone B
Medium density average (X 32)
 - Development Zone C
Medium density average (X 32)
 - Social & Community Infrastructure
 - Employment & Connectivity
- Total potential units at a medium density
- Developable Area By Ownership:
- | | | | | |
|------------|---|--------|---|--------|
| Down | = | 16.6Ha | = | 531 ur |
| Freemantle | = | 11.3Ha | = | 362 ur |
| Broom | = | 26.1Ha | = | 835 ur |
- 1 Potential For the land adjacent development as most of the site
 - 2 Development buffer to be created
 - 3 Wildlife area created within flood zone
 - 4 Enhanced woodland / wildlife area from A376
 - 5 New Junction
- N
O

The masterplan illustrates a development that is bisected by a new north-south road linking the A376 and the A3052. There are no settlements in the immediate vicinity of this proposal, rather it sits on farmland with a few farm buildings, dwellings and other rural structures. Given this rural context there are few existing services or directly accessible employment opportunities that the development could draw on, rather these would need to be provided as new. Such provision would be costly, drawing on developer contributions, and the new road through the site would also be expected to be expensive. If busy such a road could be challenging to implement successfully in respect of making for a high-quality place.

				<p>This site falls on land that formed part of the Option 3 site assessment in the new community assessment work. Option 3 performed only marginally less well than the selected Option 1 in the new community assessment work. Option 3 was recorded as having a medium overall sensitivity to development in landscape terms, but greater sensitivity was identified in southern and eastern areas, that is away from where this development is proposed. These southern and eastern areas were also more sensitive in biodiversity terms respect of proximity to the Pebblebed Heaths and the Exe Estuary. Significant heritage concerns were not noted. Mapping review identifies limited designated features in proximity of areas that are illustrated for built development.</p> <p>Being rather isolated from existing facilities and services and with existing bus services on roads that lie some way to the east, north and south of the bulk of proposed development the development could be very car dependent. That said, the scale of development proposed may be such to secure new public transport provision. It is not however considered that it would be sufficient to deliver the levels of self-containment sought within the already allocated second new community and so this would form an unsustainable form of development that would be likely to, in combination with other developments, have a detrimental impact on the road network.</p>	
	Land between Crealy and Greendale	Around 1,500	9	At 1,500 homes the land between Crealy and Greendale falls in the mid range of the proposed schemes. A Masterplan produced by the promoters is reproduced below.	No



The masterplan illustrates a development that falls to the south (but for a small area) of the A3052 with Crealy Leisure resort to its western boundary and Greendale Business Park to its eastern/south-eastern boundary. The development takes a comparatively linear form for the most part lying close to the A3052. Whilst there are no existing villages/ settlements in the immediate vicinity of this proposal it does benefit from substantial employment sites being in close proximity and also the existing Greendale Farm shop occupies a relatively central position within the site. A further key point to note is the new community site lies just to the north of this site,

				<p>with both it and this proposal running up to the A3052. Should this development proceed there could be scope to access services and facilities in the new community, but this would depend on where abouts they are located in the development and also access would be dependent on crossing the busy A3052 highway which is not likely to be safe or attractive.</p> <p>This site falls on land that formed part of the Option 2 site assessment in the new community assessment work. Option 2 performed less well than the other two development options. The elevated parts of the site are of higher landscape sensitivity, and they are comparatively close to the East Devon National Landscape. This site, notably eastern parts, is close to the Pebblebed Heaths so in this respect there are biodiversity concerns.</p> <p>These southern and eastern areas were also more sensitive in biodiversity terms in respect of proximity to the Pebblebed Heaths and the Exe Estuary. Significant heritage concerns were not noted. Mapping review identifies limited designated features in proximity of areas that are illustrated for built development.</p> <p>Existing bus services run close to the site, most notably along the A3052 on the northern site boundary.</p>	
	Addlepool new village	Around 800 new homes	9	At 800 homes the Addlepool proposal is the smallest of the proposed schemes. A Masterplan produced by the promoters is reproduced below.	No



The site lies to the north of the village of Ebford and to the east of the A376 and east of Cyst St George village. At its northern edges it is close to the southern edges of the proposed Land between Cyst St Mary and Cyst St George scheme. The site falls on the southern edges of Option 3 of the new community assessed options.

Ebford and Cyst St George fall relatively close to the proposed development, though new housing would be separated by fields and in the case of Cyst St George by the busy A376. The villages are quite small with limited facilities so new facilities would

			<p>be required in association with the development, though being the smallest of the possible development options it has the least growth to secure provision.</p> <p>This site falls on land that either formed part of the Option 3 site assessment in the new community assessment work or adjoins it. Option 3 performed only marginally less well than the selected Option 1 in the new community assessment work. Option 3 was recorded as having a medium overall sensitivity to development in landscape terms, but greater sensitivity was identified in southern and eastern areas, this site being to the south. These southern and eastern areas were also more sensitive in biodiversity terms in respect of proximity to the Pebblebed Heaths and the Exe Estuary. Significant heritage concerns were not noted. Mapping review identifies limited designated features in proximity of areas that are illustrated for built development.</p> <p>Existing bus services run at/through the site though it is located further away from Exeter and the new community site than the other proposed developments.</p>	
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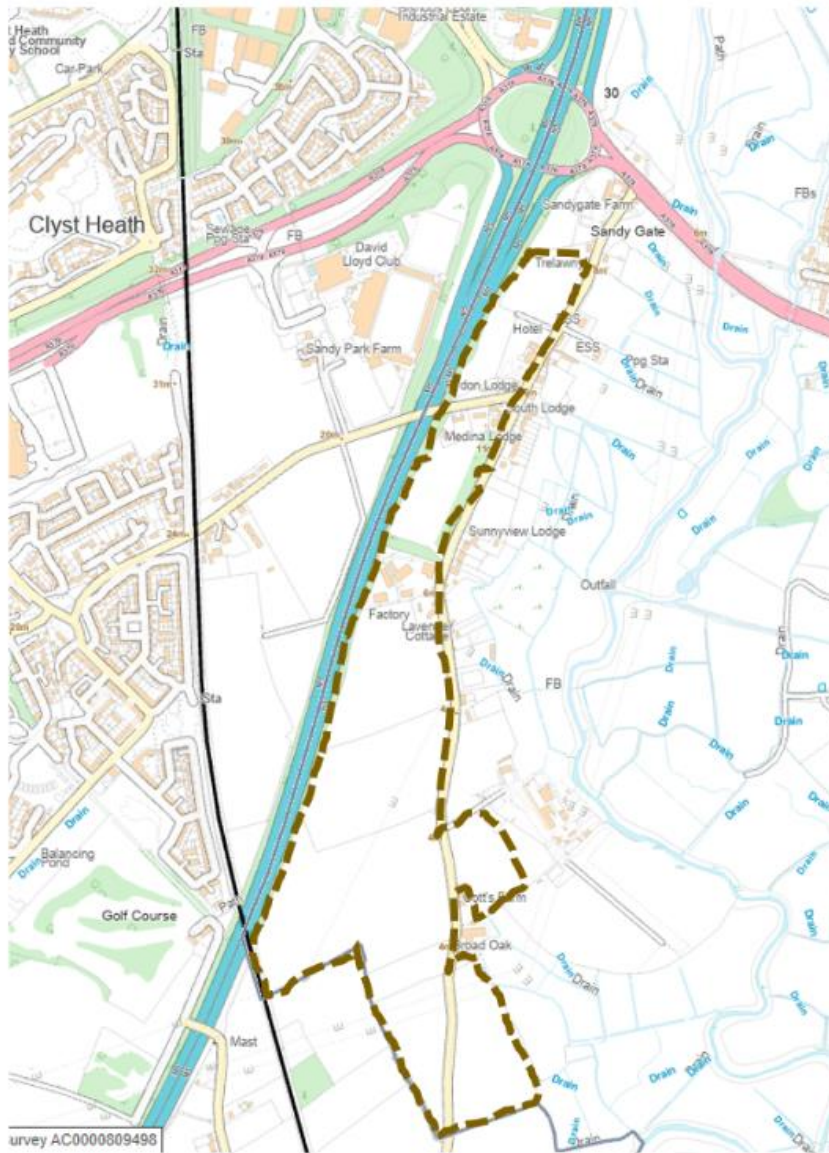
5.6 The table above provides a critique of site options. Below, however, we provide some more detailed commentary.

Development on land north of Topsham

5.7 Papers to Strategic Planning committee on the 23 September 2024 (meeting not completed on this date and reconvened on 1 October 2024) see: [7 Proposed Housing and employment Allocations West End.pdf \(eastdevon.gov.uk\)](#) and [71 Topsham site selection report.pdf \(eastdevon.gov.uk\)](#) recommended the allocation of land for mixed use development incorporating housing and supporting facilities.

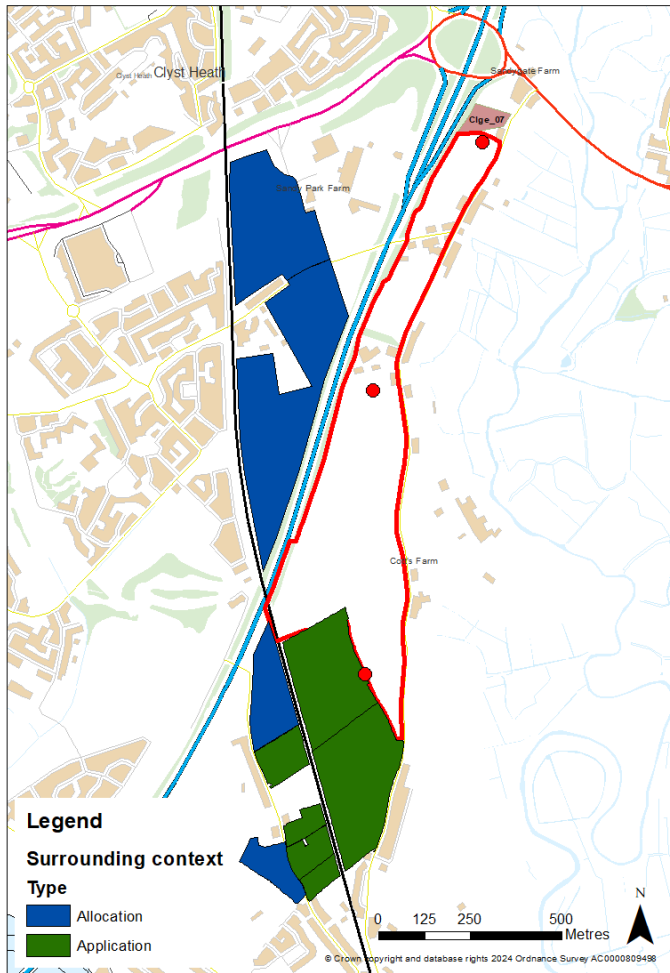
5.8 In the draft local plan the site was identified as offering capacity for around 580 new homes. At the committee meeting (as discussed on 1 October 2024) there were however challenges raised in respect of potential and desirability for development.

5.9 The approximate extent of the proposed allocation, within East Devon District, is shown on the map below/over the page. It should be noted that the southern boundary of the site abuts the boundary of Exeter City and at and to the south of this boundary there is considerable new development occurring and planned in the city. The M5 Motorway lies to the west of the site, the centre line of which forms the East Devon/Exeter City boundary, and on the city side there is also extensive new development planned in this area.



- 5.10 The proposed allocation is shown by the brown dotted line above, though please note that this is an indicative boundary at this stage only and has **not been drafted** to exclude existing roads and existing dwellings and built premises within. Should the site finally be allocated for development there will need to be refinement of boundaries and refinement of exactly what is shown as allocated land. The expectation being that the allocation would be made up of currently undeveloped land that is mostly in agricultural use. It should be noted that the great majority of the proposed allocation has been submitted through various 'calls for sites' and/or local plan representations. It should also be noted that committee endorsed the allocation of a small area of land to the north of the proposed allocation (it has site reference Clge_07) for employment uses in the new local plan.
- 5.11 The proposed allocation site, made up of various parcels of land/site assessments, is described in site assessment work that was considered at committee. Whilst the site is made up of land in agricultural use there is quite a lot of straggling linear development along the road forming the eastern site boundary, as such the proposed allocation is not a straight incursion into open undeveloped countryside.
- 5.12 Placing the site in a wider context the map below shows land that was shown as allocated for development in the draft local plan for the city, in blue, and which has permission for development, in green. The planned development in the city is mostly

for housing use, though some is for employment. In total the identified city land may accommodate around 750 net new additional homes, plus there have been several hundred new homes built in this area in the city in recent years. Note the red line boundary below needs refinement to align with proposed allocation area reported above (but it is approximately the same).

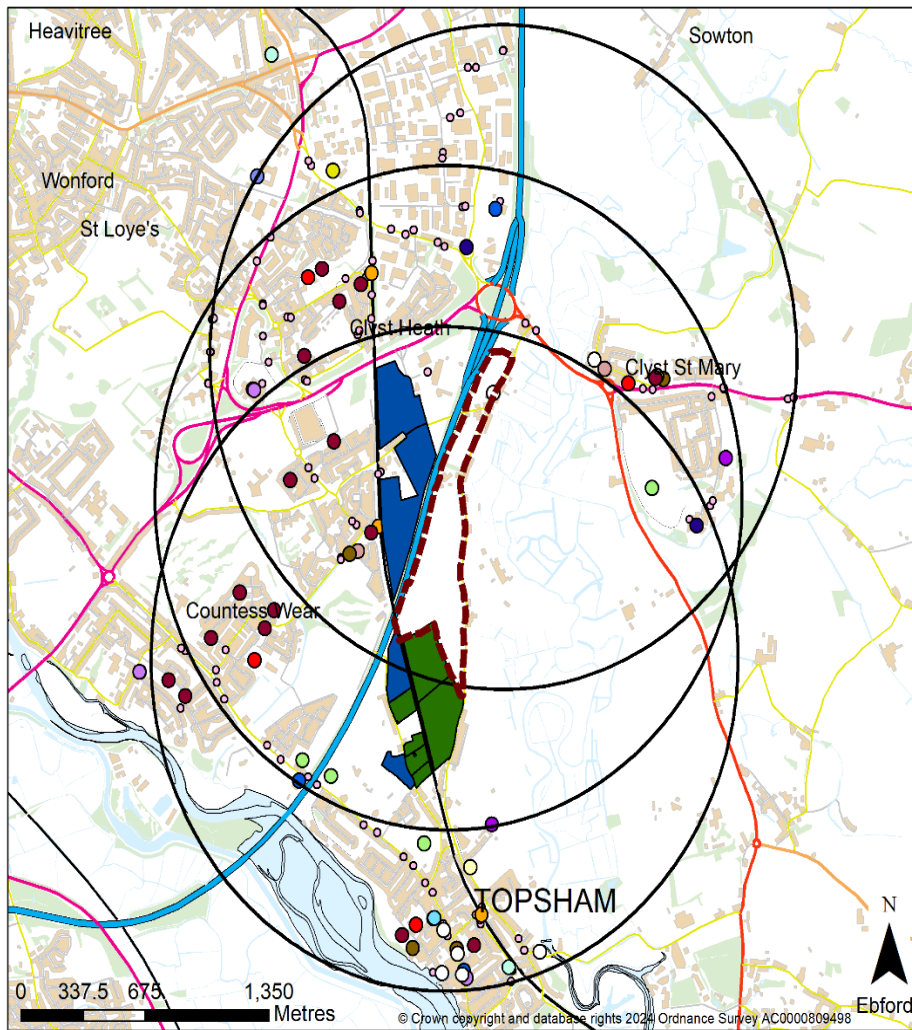


- 5.13 An agent making representation on the local plan has submitted a Framework Plan that illustrates their suggested indicative layout for a development that covers a southern part of the proposed allocated land for development in East Devon. For information purposes only the plan below/over the page forms an extract of the submission. Including this extract does not in any way infer any status or endorsement of the material submitted, rather it illustrates that at least some work has been done, from an agents perspective, on how some of the land could potentially be developed.



- 5.14 The submission shows, on the yellow land on the map, an indicative figure of 446 new homes within the red line area, noting that south of the red line is land in Exeter City. Working on the basis the scale of the proposed allocation in the local plan looks reasonable.
- 5.15 It is stressed, however and at this stage, that this figure has not been subject to rigorous testing and assessment but it provides an indicative guide to work to. Reflecting on this indicative scale of development and concerns raised at committee we highlight a number of key considerations below.
- 5.16 **Need for a cross local planning authority working** - in discussion with officers of Exeter City Council it has been agreed, at officer level, that development in East Devon and across the boundary in the city should come forward under agreed cross-boundary planning. The need for such planning should be specified in both East Devon and Exeter local plan policy in respect of respective land allocations. Development should only come forward where in accordance with agreed plans which will set out a coordinated programme for development and delivery.
- 5.17 **Primary school education provision** - Through officer discussion, with Exeter City Council, East Devon District Council and Devon County Council, the latter as the education authority, it has been agreed that it would be highly desirable for allocated land in East Devon to accommodate a new primary school. Joint masterplanning work should specify details of location and mechanisms for delivery. Exeter City Council, are seeking to identify land for three new primary schools to serve current/future education needs off/for the city, but it is recognised that there are very limited potential land options within city boundaries.

- 5.18 Devon County Council work on the basis of each (one) new dwelling generating the requirement for 0.25 primary education places (the secondary provision for each new dwelling is 0.15 places). 670 new homes in East Devon, using this multiplier, generates the need for primary education provision for 168 pupils. A single form entry new school is planned to accommodate 210 pupils so on the East Devon side of the boundary, alone, pupil numbers generated would be expected to occupy around 80% of places available for such a school. Devon County Council would, however, typically rather see two form entry primary schools, i.e. for 420 pupils. Using the 0.25 multiplier a 420-place school would provide for educational needs for 1,680 homes – a figure not that much in excess of what is highlighted as planned for development on the East Devon land and across the city boundary in the vicinity in Exeter.
- 5.19 Sufficient land should be provided to accommodate a school capable of accommodating 420 places. Devon County Council have advised of an area of around at least 1.8 hectares typically being required to accommodate a 420-place school. Developer contributions, through/from Community Infrastructure Levy monies and/or Section 106 monies, generated from within East Devon and in Exeter City, should contribute to new school provision.
- 5.20 We highlight new primary school provision as such provision is identified in terms of educational need but also because a new school is seen as a critical facility to help build and establish a sense of community to a location, it becomes a real asset in 'place-making' with potential through shared facilities to serve wider community needs.
- 5.21 **Community facilities in association with development** - It is recognised that the East Devon proposed area of allocation has few facilities in the immediate proximity of the land, though these do include a pub and employment space. Various parts of the site are, however, within 1,600 metres of existing facilities. The plan below/over the page shows key community facilities in proximity of the proposed allocation in East Devon. The three circles show 1,600 metre (about one mile) straight line distances from various points within the site.



Legend

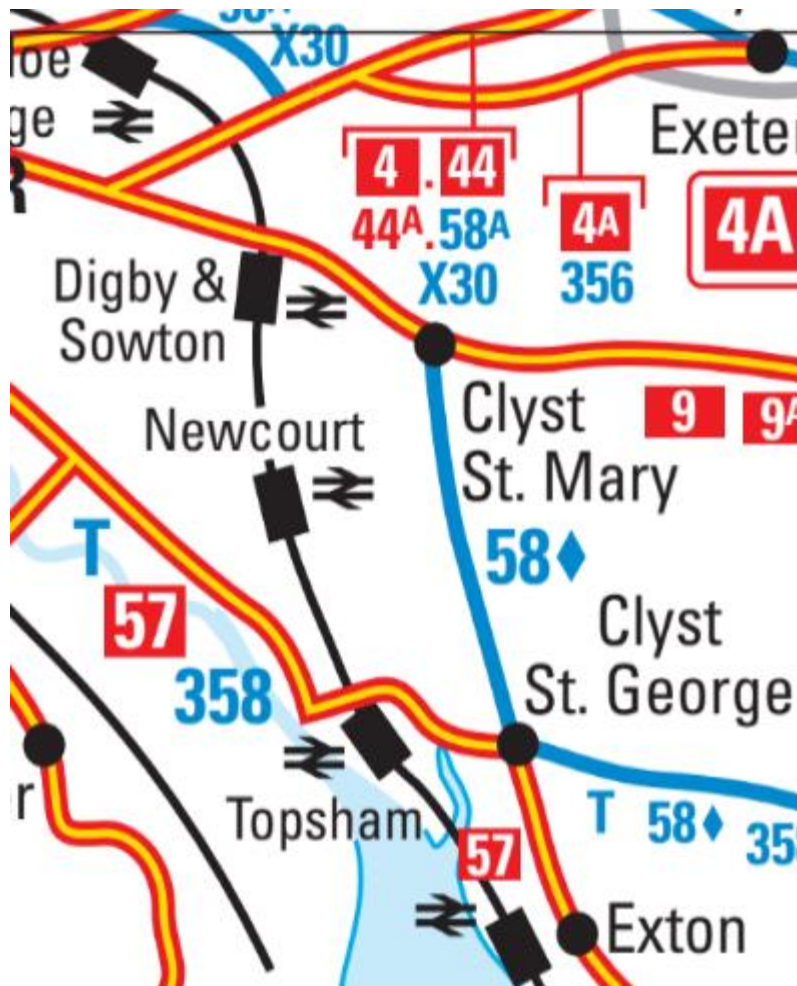
	Site North Point Buffer		Emergency Services Facility		Convenience Store
	Site Central Point Buffer		Post Office		Pharmacy
	Site South Point Buffer		Open Space		GP
	Exeter Plan Allocation		Library		Secondary School
	Permitted Application		Playing Pitch		Primary School
	Allotment		Employment Area		Supermarket
	Children's Play Area		Community Building		Bus Stop
	Pub		Train Station		Site boundary
	Hospital				

5.22 This assessment, notwithstanding the 'barriers' of the motorway and railway, illustrates that there are a good range of facilities relatively close to the site, but not on its immediate doorstep.

5.23 The lack of immediate proximity of facilities reinforces the appropriateness of new school provision but also highlights the desirability and need for a wider range of community facilities and spaces being accommodated in the development. We would envisage further work defining such facility needs in order to inform plan policy and thereafter to be articulated through a masterplan. What we would highlight, however,

is that the proposed allocation lies immediately to the west of the proposed Clyst Valley Regional Park expansion.

- 5.24 **Transport and movement** - It was highlighted at committee that potential for new bridges over the motorway and the railway would be desirable. Not the least they would make pedestrian accessibility to facilities much better. Whilst technical assessment work has not been undertaken we would suggest that a new bridge over the motorway, whether pedestrian/cyclist only or for also accommodating motor vehicles, would be extremely expensive and as such it is reasonable to assume would not/could not be afforded. A new bridge over the railway, at a point close to where the railway currently crosses the motorway, might however be a more feasible proposition.
- 5.25 Any development coming forward will need to provide safe footpath and cycle access routes, noting some existing concerns at present. There are relatively close railway stations at Newcourt and Topsham in the city. There will, however, be a need to carefully consider scope for requiring and attracting a bus service at and through the allocation.
- 5.26 Existing regular bus services, run in roughly east/west directions travelling close to the north of the site (through Clyst St Mary under Junction 29 and into the city) and they run to the south (further away) through Topsham. Through master planning work there should be scope to seek to secure new bus provision in association with development, and through planning agreements subsidise them for a period of time. However, there is a concern around whether a north/south bus service running adjacent to or through the site could be secured long term. Specifically, whether it would be a commercially viable stand-alone proposition for a commercial bus operator. More work is needed in respect to this consideration. An extract of existing routes/service numbers is shown below/over the page.



- 5.27 The proposed allocation falls roughly in the centre of the map and noting that the 58 north/south service (in blue) runs over the River Clyst 800 metres plus to the east of the site. Highway access to the site, notwithstanding some narrow stretches of roads (with association pedestrian and cyclist safety concerns) is seen as acceptable.
- 5.28 **Noise considerations** - It is noted that the motorway is noisy and that further work on noise considerations will be needed. However much of the site falls below the motorway level and there are existing dwellings close to the motorway close to the site and also at other locations nearby and alongside the motorway. There is also planting alongside the motorway.
6. **Refining housing numbers on site allocations**
- 6.1 The site capacity levels that we set out in this report will need some refinement before we get to the Regulation 19 draft of the plan. In current format they are a product of defined standardised capacity formulas though in some cases we have moderated these by noting figures that prospective developers are quoting and or by doing some bespoke (albeit higher level) more detailed site assessment work. There is, therefore, the need for some refinement of numbers, but we would stress that this is unlikely to generate substantive changes.
- 6.2 Of greater significance (which is more likely to reduce numbers or more likely impact on rates of delivery - slowing them down) will be factors listed and commented on

below. It should also be noted that these considerations may also have a bearing on employment site considerations as addressed further on in this report.

- 6.3 **Habitat Regulations** – we need to assess plan policy under the Habitat Regulations – these are legal process tests around ensuring that negative impacts do not arise on the highest tier of wildlife sites as a consequence of development. We have established mitigation practice in respect of recreation impacts on the Exe Estuary and the Pebblebed Heaths. Though we will need to continue with this work.
- 6.4 Committee will be aware of nutrient concerns associated with the River Axe and these may impact on development. This though is presumed to be more a matter around the timing and phasing of development in and around Axminster (on the Axe catchment) rather than being a capacity constraint.
- 6.5 Of new concern are internal combustion engine vehicle pollution impacts on the Pebblebed Heaths. With increasing vehicle numbers come increasing pollution levels and these are predicted to adversely impact on the Pebblebed heaths and wildlife and habitats. We have consultants assessing this specific matter and whilst it could impact on acceptable levels of development it is more likely to be a concern that may impact on phasing of development. Over time a switch to electric vehicles and cleaner fossil burning vehicles is presumed to result in lower emissions that should, in time, overcome concerns.
- 6.6 **Highway capacity constraints** – we have traffic modelling being undertaken at present. The outputs may impact on rates of delivery that can be achieved or, in the absence of full or partial mitigation or improvements may impact in actual numbers that can be built. This is a concern that specifically applies to the western side of the district.
- 6.7 **Flood Risk** – National policy requires that development is directed to areas at least risk of flooding through applying a sequential approach. Throughout plan preparation we have sought to avoid allocations in areas at risk of flooding, but some of these sites are in highly sustainable locations and can make good use of brownfield sites, such as the Exmouth Police Station and Axminster Carpets sites. A Strategic Flood Risk Assessment (SFRA) level 2 has recently been completed to understand the nature and extent of flood risk on sites where this could be an issue. The SFRA concludes that, subject to a detailed flood risk assessment being undertaken at the planning application stage and the areas at higher risk not being developed, the allocation of the sites assessed for the SFRA level 2 would be in accordance with the national approach of guiding development to areas at least risk of flooding. Further work will be required to demonstrate that the local plan allocations meet the ‘sequential test’, and where appropriate the ‘exception test. The SFRA indicates that the exception test will be required for sites Axmi_07 (Axminster Carpets) and Musb_01a (Baxter’s Farm). Some additional work will also be needed to screen sites that have not yet been assessed to establish whether any further SFRA level 2 work will be required.
- 6.8 **Sewage capacity and other constraints** – we are aware that sewage capacity considerations may impact on sites coming forward. This is, however, expected to be primarily a concern around timing and phasing matters rather than an absolute block

on development. A water cycle study is in production and will be presented to committee once completed. Unfortunately, this work has encountered further delays through consultants needing to do further work liaising with South West Water.

6.9 **Major development in National Landscape (AONB) areas** – National policy is that major development should not be permitted in a National Landscape (NL) other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. In June this committee agreed an approach to identifying what constitutes ‘major development’ in this context and how to assess ‘exceptional circumstances’. Work is ongoing on assessing the allocations so far agreed and generally indicates that, where an allocation is found to constitute major development, a case can be made for there being exceptional circumstances. The exception to this so far has been in Exmouth, where Exmo_17 is proposed for 410 dwellings in the East Devon National Landscape while allocations that are not in the NL and are preferable in landscape terms have not been made (such as Lymp_07, 09 and 10). Members should be aware that there is a very ‘high bar’ that needs to be met to justify exceptional circumstances for major development in a national landscape. To dismiss alternatives sites that are not in a NL for reasons such as a Green Wedge location would be to risk not being able to demonstrate ‘exceptional circumstances’ that could result in the need to remove some allocations in the NL’s. This position will need to be further assessed following Members further consideration of the site presented on this agenda.

6.10 **Mixed use sites incorporating community and employment provision** – we will be recommending in plan policy that a limited number of sites are allocated for mixed uses. This may impact on some housing capacity numbers though we need to do some more work around this matter before finalising provision.

7. **Employment land considerations**

7.1 In order to provide for sufficient new employment in the local plan members will need to determine sites in this section of the report that should be allocated. On land allocated for employment use, uses other than E(g), B2 and B8 (offices, research and development, industrial processes and storage and distribution) will not usually be permitted.

7.2 The Economic Development Needs Assessment (EDNA) identifies a need for around 70 - 80 hectares of employment land in total. In theory this takes account of latent demand but our Economic Development team suggest that there is additional unmet demand based on enquiries, and that a higher level of provision is therefore warranted. In any case, there is some merit in providing choice to the market notwithstanding need data.

7.3 There is a risk in oversupplying in that, if too much land is allocated, the Council may come under pressure to release employment land allocations for housing and thus lose the opportunity to bring them forward for employment in future plans.

- 7.4 There is also a risk that an over allocation of employment land in relation to housing land provision could be argued to warrant an increase in housing numbers to meet additional need from the jobs being created over and above normal projected economic growth. This has been flagged as a concern in recent evidence work for the local plan and held up the examination of the last local plan for 18 months while housing figures were re-run and additional sites found.
- 7.5 There was far less potential employment land than housing land submitted for consideration through the Call for Sites and so there isn't a large surplus to select from. The methodology sifted out severely constrained sites and those in rural locations away from tier 1-4 settlements but did retain sites adjoining existing business parks and industrial estates to allow for expansion. These sites were then assessed using the same considerations as were applied to the housing sites. Of particular note was the very detailed landscape, ecology and heritage assessment work and the comments regarding infrastructure from Devon County Council.
- 7.6 It is proposed to allocate dedicated employment sites that amount approximately to the need identified in the EDNA. Suggested allocations in Appendix 3 amount to 74.2ha. This may reduce if Members do not agree some recommendations. This includes a number of mixed-use sites where it is envisaged that a specific land area will be identified for employment purposes.
- 7.7 Note that we have over 44.13ha of employment land either consented or covered by an LDO that will come forward in plan period in addition to the above that does not need to be allocated in the plan.
- 7.8 The new communities will also bring forward in the region of 35.9ha during the plan period with significant potential for the second new community to exceed the proposed quantum particularly if delivered through an appropriate delivery vehicle.

8. Regulation 19 local plan consultation

- 8.1 Officers are working to a timetable that will see a report coming to committee on 11th December 2024 recommending that the local plan is made available under Regulation 19 of the plan making regulations for people to make comment on.
- 8.2 This is the timetable set out in the Local Development Scheme and it advises of the period for comments running from December 2024 to January 2025. The plan itself, the comments received and supporting evidence documents will be sent (the Submission) to the Planning Inspectorate for the Examination of the plan. The LDS proposes submission for Examination in May 2025, noting that as things stand there is a proposed deadline date of June 2025 for submission to meet in order to progress under the current plan making regime. The consultation on the new NPPF indicated that this submission date would be removed which may give more time.
- 8.3 It is likely that a further consultation at Regulation 19 stage will be needed to seek views on the masterplan for the second new community and further related evidence particularly the Greater Exeter Transport Study. It is hoped that this consultation can take place as early as possible next year.

- 8.4 Government determined deadlines that we may need to meet are, however, not yet confirmed but may impact on the above.

9 Implications for Neighbourhood Plans

- 9.1 Members will recall that in identifying housing sites to meet the district housing requirement through the new Local Plan, it is not proposed to rely on allocations in future neighbourhood plans (noting the exception of at Clyst St Mary). Instead the responsibility for undertaking the work to identify and justify sufficient sites to meet the minimum housing requirement (plus headroom to manage risk) will rest with the Local Plan.
- 9.2 Sites that are allocated in made Neighbourhood Plans are however included in projections of new development, although the numbers involved are very low. Future new or reviewed neighbourhood plans can continue to make their own additional provision for housing to meet identified local needs, and influence the shape and nature of developments coming forward. Whilst there will inevitably and unavoidably be conflict with some existing neighbourhood plans associated with making decision on site allocations in the new Local Plan, greater certainty about its content will enable communities to better consider whether and when to revise or commence new neighbourhood plans for the period to 2042. The decisions will also feed into the recalculation of housing numbers for the individual Designated Neighbourhood Area Housing Requirement figures that the NPPF requires us to set in strategic policy.

Financial implications:

The work to produce to this report has been met within existing budgets. There are no other specific financial implications within this report on which to comment.

Legal implications:

The local plan will need to set out how projected development arising from plan policy will meet minimum housing development numbers set out by Government for East Devon. It will be essential for the local plan to allocate sufficient sites, with confidence of delivery demonstrated, to ensure Government requirements for development are met. If the plan does not include sufficient housing development there is a likely expectation that it will fail at Examination or the Examination process will be paused by the appointed planning inspector/s with instruction to find more sites/scope for housing development. Unknown risks also remain in respect of when a new NPPF may be published, what it may say, specifically including in respect of housing numbers, and what sort of timetables for plan making work it may establish or demand, if sufficient sites are not allocated in accordance with the current NPPF. There are no other specific legal implications requiring comment (002533/29 October 2024/DH).

Need to insert or have as standalone documents a number of Appendices.

Appendix 1 – Schedule of site assessments for the individual sites that are reported on in this report.

Appendix 2 – Schedule of sites that were considered by earlier committee meetings.

Appendix 3 – schedule of proposed employment sites and employment allocations for inclusion in the local plan