

Date of Meeting: 22 November 2024

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

East Devon Local Plan – redrafting of local plan chapters

Report summary:

This report sets a first proposed redraft, appended, of - Chapter 6. Strategy for development at Principal Centres, Main Centres, Local Centres and Service Villages - of the local plan. This chapter is specifically concerned with the allocation of land for development and it follows on from decisions made on sites to allocate in past weeks at committee. The final plan wording (for Regulation 19) is planned to come to committee on 11 December 2024. The plan policy sets out levels of development envisaged on any given site as well as specifics and details about requirements applicable to the development of that site.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

1. That committee endorse the proposed draft revised - Chapter 6. Strategy for development at the Principal Centre of Exmouth, Main Centres, Local Centres and Service Villages - of the local plan noting that they will need to be refined in readiness for the proposed Regulation 19 draft of the plan.

Reason for recommendation:

To seek in principle committee approval for the emerging local plan text.

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Portfolio(s) (check which apply):

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

- Tourism, Sports, Leisure and Culture

Equalities impact Low Impact

Climate change Low Impact

Risk: High Risk; The local plan needs to progress in a timely manner if it is to meet potential Government deadlines for plan preparation. That said there are unknowns over final deadlines that may be set by the Government and as or when they may issue new policy. The Government had previously indicated that plans may proceed under the existing NPPF and what are comparatively lower housing numbers if they reach Regulation 19 stage of plan making (plan consultation) within one month of a new NPPF being published. It is unknown if this timing ruling may stay in place, or not, or when a new NPPF may be published, though some commentators have suggested a late December 2024 publication of a new NPPF is quite possible.

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 specifically sets out proposed wording for Chapter 6 of the local plan. This chapter has the specific task of allocating land for development at the Principal Centre of Exmouth, the Main Centres, the Local Centres and the Service Villages. This chapter is proposed for inclusion in the Regulation 19 draft of the plan. It is highlighted that at this stage the wording provided is not regarded as necessarily being the final wording that should be included, but it is intended to give a very clear steer on the policies that officers would advise for inclusion in the plan and a draft of wording that should apply.
- 1.2 Officers have reviewed the plan text that featured in the 2022 draft plan [commonplace-reg-18-final-071122.pdf \(eastdevon.gov.uk\)](https://eastdevon.gov.uk/commonplace-reg-18-final-071122.pdf) alongside responses to consultation, any emerging new evidence, sustainability outputs and other work in arriving at redrafting wording.

2. Overview of Chapter 6 redrafting

- 2.1 Chapter 6 is a reworking of the equivalent chapter in the draft local plan. Though note that it does not cover policies for the western side of East Devon – these feature in Chapter 5 of the plan which has in draft form already been considered by committee.

2.2 Most importantly the new Chapter 6 includes all of the sites that have been determined for allocation in previous committee meetings and excludes all of the sites that committee rejected. Committee agendas and more importantly minutes from these meetings should be viewed for a complete picture. Attached as Appendix 1 is the proposed redrafted chapter and Appendix 2 includes maps of the agreed allocations to help with identification of sites when reviewing the chapter wording.

2.3 In the redrafting process we have reviewed sites that have particular challenges, constraints or opportunities and have drafted policy to reflect on and respond to these. This means that some allocations have limited wording, specifically so where development would appear relatively straightforward, bearing in mind that we would seek compliance with all relevant policies in the plan elsewhere, as a norm. However, where there are site specific matters that need particular attention on any given allocation site, we have set out explicit requirements for development in plan policy. These include, on larger and more complex sites, the need for comprehensive Masterplans to be produced to lead and guide the development of the site.

2.4 The overall housing allocations feed into a table of housing provision for the local plan as set out below covering projected development from 2020 to 2042.

Completions 2020 to 2024	3,514
Commitments (site with permission plus Cranbrook Plan allocations)	7,721
Future windfall projections - 2024 to 2042	1,946
Allocations proposed in the Reg 19 Plan (in Chapters 5 and this Chapter 6 of the plan)	9,413
Total	22,594
Target figure at 946 per year plus 10% buffer for years 2024 to 2042	22,539

2.5 The above table shows that there is a slight 'over-provision' against requirements of 55 homes. It should be noted that we have included in the total a figure for Honi_18 of 136 new homes and Budl_01 a figure of 50 homes. At the time of drafting this report we do not have clear confidence of delivery on these sites and further assessment work is ongoing.

2.6 Honi_18 is on the eastern side of Honiton alongside the A35 road. To date National Highways have not committed to the principle of allowing for a highway access from this road. We and the prospective developers are, however, in dialogue with them. The challenge with Budl_01, in Budleigh Salterton, is that whilst there is one (or more) fields of what is a large site that would be credible development options it is not clear if an acceptable highway access can be achieved to it/them without a lengthy stretch of road cutting through a number of fields in order to access the more acceptable (south-easterly) field for development.

2.7 We are also revisiting yields for some sites and looking at how these could be maximised, the consequence of which may be that allocation numbers can be increased in some cases. It is anticipated that by the time of presentation of the

Regulation 19 plan to Members in December these issues will be resolved and we will have sufficient allocations to provide for the requirement figure and a good level of headroom that is around the 10% that we were aiming to provide.

- 2.8 The redrafting we have undertaken will also help to ensure a shorter and more precise plan overall. In particular we have removed a lot of commentary about settlements that was of help at the consultation stage, but is not necessary to inform decision making. A more succinct plan is in line with national guidance that favours shorter plans and as such we would wish to make it easier to use and understand. However, and of critical importance, extensive evidence and assessment sits behind the plan and policies and it helps establish the justification of the policies. In many respects commentary about individual settlements and what makes them special is best left to neighbourhood plans that are prepared by the community who live there.
- 2.9 In policy redrafting we do not show amendments as tracked changes as to do so would result in a very cumbersome and long document to read through. It is therefore essential, if comparing the draft plan and new proposed wording, to compare the two alongside each other.
- 2.10 For each chapter of the plan there is a separate audit trail report in production that explains the evolution of plan policy and the factors that have informed drafting. In some cases, cross-reference to other more detailed technical assessments. The audit trail documents are reports that will be updated as plan making progresses, as such they are live documents with version control/referencing.
- 2.11 In previous reports that have accompanied redrafted chapters of the plan we have appended drafts of these audit reports. These are not the final article and new versions will be produced in the months ahead as new matters come forward. In due course the intent is that later versions of these reports will accompany the documents that are submitted for plan examination and be considered by the appointed planning inspector/inspectors alongside other material. The audit reports will tell, therefore, the evolving story of plan/policy evolution and the basis and reasoning for plan content. Since site allocations decisions were being made as recently as the 1st November it has not been possible to produce a draft audit trail document for Chapter 6 for this agenda, however this will be presented with the Regulation 19 version of the plan in December.

3 Implications for Neighbourhood Plans

- 3.1 Members should be aware that Neighbourhood Plans will continue to be examined for general conformity with the adopted Local Plan (2031), with some (increasing) consideration given to the relationship with the emerging Local Plan, until such time as the new Local Plan is at least at Main Modifications stage.
- 3.2 Progress in a timely fashion, in line with the published timetable, and in agreeing content for inclusion in the Publication Version of the local plan is therefore important in giving increased certainty to communities in considering the need for a neighbourhood plan, and planning for the preparation of a new or reviewed

neighbourhood plan. This includes which policies will be strategic policies, as the legal tests ('Basic Conditions') against which neighbourhood plans are examined, includes their being in general conformity with the strategic policies of the Development Plan for the area.

3.3 Neighbourhood plans can choose to allocate sites for development if that is favoured by the plan makers. Any such sites allocations would be in addition to those that we show for allocations in the local plan. Such allocations can help establish a local vision for (additional) development that may respond to locally identified needs or opportunities.

Financial implications:

There are no specific financial implications impacting the council in this report.

Legal implications:

There are no specific legal implications requiring comment within this report (002533/22 November 2024/DH)