

**This redraft of the local plan,  
subject to further refinement, will  
form the Regulation 19 Publication  
Local Plan.**

# East Devon Local Plan 2020 to 2040

Regulation 19 –  
Publication Draft Local Plan

This draft – Dec 2024



Draft document

## Foreword

### East Devon is an outstanding place.

From the rugged beauty of our Jurassic Coast to the peace and tranquillity of our National Landscapes, we are surrounded by a glorious, thriving natural environment; between the quiet vitality of our towns and the gentle warmth of our historic villages, we share in a proud and welcoming community - and whether in the fierce determination of our farmers, rural workers, and small business owners, the passion and resilience of our tourist industry, or the drive, creativity, and innovation of our high- and green-tech industries in the West End and Enterprise Zone, we benefit from a diverse, resilient, and growing rural economy.

This Local Plan, guiding development in East Devon through to 2042, aims to preserve and enhance these distinctive qualities. While government policy necessitates the allocation of land for housing and employment, our focus remains firmly on ensuring development is balanced, sustainable, and beneficial to our communities. This Plan is underpinned by principles that seek to protect our outstanding landscapes and wildlife while fostering vibrant, inclusive communities.

Key to this vision is our commitment to delivering genuinely affordable housing and implementing strong measures to reduce carbon emissions both during construction and throughout the operational lifespan of new developments. We also aim to exceed government requirements for biodiversity enhancement and set out a comprehensive strategy to support thriving town centres, robust community facilities, and opportunities for local businesses to flourish. By creating spaces that enable residents to live and work close to home, we aspire to make East Devon even more attractive to the industries of the future. We hope this vision delivers as far as we can on what our community has told us is important, and we're grateful to everyone that has participated in the process of developing them – whether through our online consultations, town hall meetings, or by coming in-person to join in discussions.

The creation of a new community between the A30 and A3052—a significant part of this Plan—exemplifies this approach. By consolidating a substantial portion of East Devon's housing needs in this new community, we can deliver the infrastructure and affordable housing that our area urgently requires. This development represents an opportunity to apply the lessons learned from Cranbrook, ensuring the new community is thoughtfully designed, sustainably developed, and well-integrated into the natural environment, with essential services and facilities in place from the outset.

We recognise there will be challenges in delivering the vision set out by this Local Plan, and that the evolving nature of government policy and the national planning framework may sometimes limit what can be achieved. However, this Plan reflects our steadfast commitment to work within these constraints to deliver the best outcomes for East Devon.

Above all, this Local Plan represents more than a framework for development; it is a pledge to the people of East Devon. It is a commitment to safeguard the exceptional qualities of our district while moving towards a sustainable, inclusive, and prosperous future for all who live, work, and visit here: to make East Devon an even more outstanding place.

**Councillor Todd Olive**

Portfolio Holder for Strategic Planning



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# Chapter 1. Introduction

## The Role of the Local Plan

- 1.1. The primary role of the local plan is to guide and inform decisions on where and how development will take place in East Devon. It forms part of the Development Plan, which is the key basis for determining planning applications.
- 1.2. The Local Plan, and the Development Plan overall, must be read as a whole to understand complete policy coverage. We have avoided replicating matters in different plan policies where a single policy reference addresses the relevant consideration.
- 1.3. The East Devon Local Plan covers the period from 1 April 2020 to 31 March 2042. Upon adoption, it will supersede the East Devon Local Plan adopted in 2016 and the Villages Plan adopted in 2018.
- 1.4. This local plan provides planning policy coverage for selected matters within the Cranbrook Plan area. The adopted Cranbrook Plan remains part of the Development Plan and is the primary plan for determining planning applications at Cranbrook. However, a limited number of policies in this new local plan will also apply within the Cranbrook Plan area, **we will add to plan policies whether they apply at Cranbrook or not – this task is not yet done.** No policies in this local plan supersede those in the Cranbrook Plan.



East Devon District and neighbouring authorities – map will need updating to reference National Landscapes (AONB). Plus look at bits we colour in grey – add grey for Cranbrook and elsewhere?

## Strategic and non-strategic policies and the Policies Map

- 1.4. The plan differentiates between strategic and non-strategic policies, as advised by the National Planning Policy Framework.
- 1.5. Strategic Policies set out the overarching approach and deal with major subject matters fundamental to decision-making or setting a general tone.
- 1.6. Non-strategic policies typically add an extra layer of detail to inform decision-making.
- 1.7. Strategic policies are denoted with the word 'Strategic' in the title, while all other policies are non-strategic. Neighbourhood Plans and their policies can supersede non-strategic policies but not strategic policies.

1.8. Many policies refer to specific locations or areas defined on the Local Plan Policies Map.

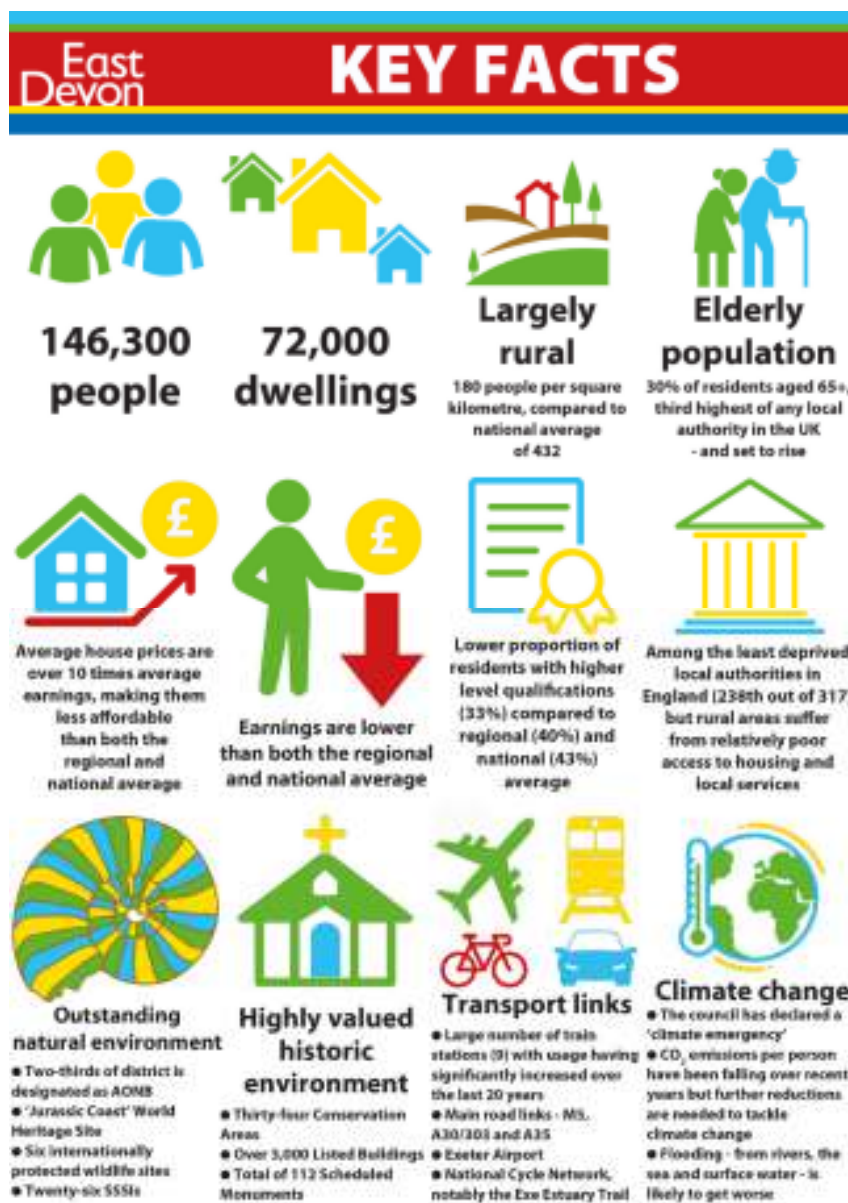


FIGURE 1 .. Key Facts – the above table will be updated. It could show where we are now (at 2024 or maybe 2020) and where we will be at 2042 in respect of numbers and data.

## The role of relationships with neighbouring planning

1.9. Neighbourhood planning is actively supported by the District Council, with 27 made plans at the time of publication. Activity to prepare and review plans is expected to increase with the new Local Plan.

- 1.10. After adoption, neighbourhood plans will be tested for conformity with strategic policies and can add local specificity or supersede non-strategic policies if needed. Once made, they become part of the statutory development plan, and development decisions should align with them.
- 1.11. We encourage developers to consider the aims and policies of relevant neighbourhood plans and engage with local communities early. The new Local Plan will supersede conflicting neighbourhood plan policies but otherwise, existing plans will remain in effect until replaced.
- 1.12. Information about neighbourhood plans in East Devon is available on the Council's website.



# Chapter 2. The Vision

## Our Local Plan Vision

- 1.1 By 2042 and beyond East Devon will be a diverse, inclusive and thriving place to live and work and a pleasure to visit and enjoy.
- 1.2 In responding to the climate emergency we will continue to play our part in what will be an increasingly net zero carbon world. At a local level we will be operating at net zero carbon, minimising energy consumption and maximising renewable energy generation. Communities in East Devon will be adapting to a changing climate.
- 1.3 We will ensure our urban areas and towns and villages, as they grow to meet future needs, continue to be great places to live and have better access to the surrounding countryside for all. Looking beyond our boundaries we will need to maintain strong relationships with the adjacent city of Exeter and our other neighbours.
- 1.4 The western side of East Devon will remain a focal point for growth with Cranbrook now well established and thriving. Our second new town will be a council and corporate led development meeting the needs of a growing population. Alongside additional housing, new high-technology and green businesses will continue to invest in the western side of the district securing high quality jobs and training. This development will come forward in an outstanding environment with the expanded and expansive Clyst Valley Regional Park wrapping around new developments.
- 1.5 Our regenerated town centres will form a focal point for business, social and community activity serving residents and visitors alike. We will secure well-paid jobs in both traditional and emerging sectors closing the gap between average earnings and house prices. We will enhance self-containment of our communities by creating more job opportunities close to where people live.
- 1.6 Rural East Devon will retain its outstanding charm and character with modest sensitively planned development to meet the needs of local communities. Farming and rural activities will still dominate the use of land. Where possible we will retain high quality land in agricultural production as we move towards more environmentally sustainable farming practices into the middle decades of the 21st century.
- 1.7 Across East Devon new development will draw on our outstanding heritage legacy but will also be innovative in design and forward looking to incorporate net



zero carbon technologies in new buildings and built spaces. Working with partner bodies we will strive to secure better facilities, especially where there may be current deficits in provision, including for schools and medical services. This will include in locations where past housing development has occurred without adequate services.

- 1.8 New, expanded and improved physical, social and community facilities and infrastructure will be delivered alongside development. This will ensure that people live healthier and happier lives with greater access to services and facilities in a cleaner and greener setting. Sustainable transport links, active travel provision and infrastructure connecting communities will be enhanced and provided alongside development. High quality urban spaces, and our existing towns and built development, will link in with enhanced Green Infrastructure, open space and recreational facilities.
- 1.9 Our beautiful and diverse countryside, National Landscapes, world class Jurassic coast, nature reserves and built heritage assets will be protected and enhanced. We will ensure that alongside new development there is greater care of the natural world with biodiversity improvements and a far richer and more nature friendly tapestry of green spaces in the future. These will support both nature recovery and the health and well-being of our communities.
- 1.10 The plan objectives set a framework for the chapters and specifically the plan policies that follow. The objectives are not in a priority order or ranking and no one carries any more or less weight than any other.

**TABLE I. Plan Objectives**

<b>Designing for health and well-being</b>	Objective 1	To encourage healthy lifestyles and living environments for all East Devon residents.
<b>Tackling the climate emergency</b>	Objective 2	To ensure all new development moves the district towards delivering net-zero carbon emissions by 2040 and that we adapt to the impacts of climate change.
<b>Meeting future housing needs</b>	Objective 3	To provide high quality new homes to meet people's needs.
<b>Supporting jobs and the economy</b>	Objective 4	To support business investment and job creation opportunities within East Devon and support a resilient economy.
<b>Promoting vibrant town centres</b>	Objective 5	To promote the vitality of our town centres, encourage investment, greater flexibility and a wider range of activities to increase footfall and spend.
<b>Designing beautiful and healthy spaces and buildings</b>	Objective 6	To promote high quality beautiful development that is designed and constructed to meet 21 <sup>st</sup> century needs.

<b>Our outstanding built heritage</b>	Objective 7	To conserve and enhance our outstanding built heritage.
<b>Our outstanding natural environment</b>	Objective 8	To protect and enhance our outstanding natural environment and support an increase in biodiversity.
<b>Promoting sustainable transport</b>	Objective 9	To prioritise walking, cycling and public transport and make provision for charging electric vehicles
<b>Connections and infrastructure</b>	Objective 10	To secure infrastructure needs at an appropriate time to support new development
<b>Supporting sustainable and thriving villages</b>	Objective 11	To help support villages and protect and enhance facilities and services they offer.

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# Chapter 3. The Spatial Strategy

## Introduction

2.1 The spatial strategy of the local plan is concerned with establishing an overarching picture of the amounts, types and distribution of future development that will be accommodated in East Devon. We set out an overarching strategic policy that addresses these matters.

### Strategic Policy SP01: Spatial Strategy

New development will be directed towards the most sustainable locations in East Devon, by:

- a. Focusing new development at the West End of the district, including a further new town, on-going development of Cranbrook and other major strategic developments close to Exeter. The West End is not spatially defined by a line on a map, rather it is term that applies to development proposals and site allocations are referred to in this Chapter of the plan.
- b. Promoting the most significant development levels at the Principal Centre of Exmouth.
- c. Promoting significant development at the Main Centres of Axminster, Honiton, Ottery St Mary, Seaton, and Sidmouth to serve their own needs and that of the wider surrounding areas;
- d. Supporting development at the Local Centres of Broadclyst, Budleigh Salterton, Colyton, Lymptone, and Woodbury that meets local needs and those in the immediate surroundings;
- e. Allowing limited development at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilminster, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill and Whimple.

Settlements not listed above, with the exception of Cranbrook and Broadclyst Station which are addressed through the Cranbrook Plan, are defined as in 'open countryside' for the purposes of the Local Plan. The open countryside definition also excludes any location that falls in a defined settlement boundary or any site or area of land that is explicitly allocated or identified in the Development Plan for built development. In the open countryside more restrictive planning policies apply.

## Justification for inclusion of the policy

- 3.1. The Local Plan promotes a sustainable development pattern that aligns growth with infrastructure. The NPPF (paragraph 20) requires strategic policies to set out an overall strategy for place-making, focusing significant development on sustainable locations that reduce travel needs and offer transport choices.<sup>1</sup>
- 3.2. The NPPF states that in rural areas, housing should enhance or maintain the vitality of rural communities, with policies identifying opportunities for villages to grow and thrive. Our spatial strategy creates a carefully considered settlement hierarchy reflecting each area's characteristics, infrastructure, and service provision. Development is strategically directed to maximise sustainability and local needs.<sup>2</sup>
- The 'West End' near Exeter: A highly sustainable area that has seen significant development since 2010, with substantial residential growth, employment opportunities, and strong functional links to Exeter. This zone offers extensive infrastructure, proximity to urban services, and efficient transport connections, making it a prime location for strategic development.
  - Principal Centre (Exmouth): The district's largest settlement, distinguished by its significantly higher population, diverse job market, and comprehensive range of community services and facilities that serve both local and wider regional needs.
  - Main Centres (Axminster, Honiton, Ottery St Mary, Seaton, Sidmouth): Settlements with strategic and local facilities that serve both their immediate area and surrounding communities, offering a balanced mix of jobs, services, and growth potential.
  - Local Centres: Settlements with reasonable population levels and a smaller but important selection of strategic and local facilities, playing a crucial role in supporting local community infrastructure.
  - Service Villages: 23 settlements with good local facilities, providing essential services and infrastructure for their immediate rural areas and supporting more localised, sustainable development.

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<sup>1</sup> National Planning Policy Framework, Dec 2023, paragraph 11a, 20a: [National Planning Policy Framework \(publishing.service.gov.uk\)](#)

<sup>2</sup> The Role and Function of Settlements, 2021: [https://democracy.eastdevon.gov.uk/documents/s13843/1a.%20Role%20and%20Function%20of%20Settlements\\_report\\_v3%20final%20draft%20for%20SPC.pdf](https://democracy.eastdevon.gov.uk/documents/s13843/1a.%20Role%20and%20Function%20of%20Settlements_report_v3%20final%20draft%20for%20SPC.pdf)

- 3.3. This approach balances development needs with environmental constraints, with approximately half of new homes planned for West End of East Devon near Exeter. The strategy prioritises sustainable locations while protecting the district's outstanding open countryside and coastal environment.
- 3.4. The hierarchy ensures development supports local community vitality, particularly in rural areas, by allowing scaled growth that matches each settlement's capacity and characteristics. In open countryside, more restrictive policies apply, with development permitted only in limited, locally justified circumstances.
- 2.2 Policies in later chapters in the plan show where land is allocated for development. Appendix ? (this is to be produced) sets out a table of all already built, permitted, allocated (in this plan) and predicted windfall development in East Devon from 2020 to 2042.



FIGURE 2 Plan showing Principal Centre of Exmouth and Main Centres of Axminster, Honiton, Ottery St Mary, Seaton, and Sidmouth. Plan to be updates to show Cranbrook and West End.

## Levels of future housing provision

- 2.3 Delivering a sufficient supply of homes' is an NPPF policy theme. The NPPF requires Local Plans to identify and meet as a minimum the objectively assessed development needs for their area. The purpose of this strategic policy is to set out what the housing development requirements are for East Devon for the plan period. This is central to the council's 'plan, monitor and manage' approach to housing development.

### Strategic Policy SP02 : Levels of future housing development

The Local Planning Authority will plan, monitor and manage the delivery of housing development in accordance with the spatial strategy and the site allocations set out in this plan, and other adopted or made Development Plan Documents in the district, including Neighbourhood Plans.

Housing provision will be made for at least **insert final number here** dwellings (net) to be delivered in the plan area between 1 April 2020 to 31 March 2042. We have, however, applied a 10% **(need to review final % number)** headroom flexibility uplift and in this will provide for **insert final number here** dwellings.

### Justification for inclusion of policy

- 3.5. The policy responds to the Council's priority of addressing housing needs by establishing a clear housing requirement based on the Standard Method using latest ONS statistics. It provides for a minimum number of new dwellings with an added flexibility headroom, supporting the government's objective of significantly boosting housing supply and aligning with the local plan's vision and spatial strategy.
- 3.6. The housing requirement encompasses an annual housing provision of 946 dwellings, with a target of approximately 4,070 affordable dwellings for 2020 to 2040, we have uplifted this figure by 10% to account for the years 2040 to 2042 giving a gross total, for 2020 to 2042, of 4,477, which is justified by the latest



evidence of affordable housing need<sup>3</sup>. The housing trajectory is illustrated in Appendix 2 as is 5-year land supply forecast at the anticipated point of plan adoption (still to be added).



FIGURE 3 New homes at Clyst St George

3.7. Detailed evidence supporting this policy can be found in the 2022 Housing Need, Supply and Requirement Interim Topic Paper, which is available in the local plan evidence base<sup>4</sup>.

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<sup>3</sup> Based on the scale of affordable housing in Sensitivity Test 3 shown in Figure 57 in the East Devon Local Housing Need Assessment 2022.

<sup>4</sup> Emerging Local Plan 2020-2042: <https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/>





FIGURE 4 Homes under construction.

## Housing requirements in Designated Neighbourhood Areas

- 3.8. This strategic policy establishes housing requirements for the 42 Designated Neighbourhood Areas (DNAs) in East Devon, in line with government policy. It provides a framework for housing development that reflects the district's spatial strategy, ensuring balanced growth across different communities.

### Strategic Policy SP03 : Housing Requirement by Designated Neighbourhood Area

Housing requirement figures for Designated Neighbourhood Areas for the purposes of neighbourhood planning are as follows: **Note, however, that the numbers in the policy are subject to final checking and possible consequential amendments.**

Designated Neighbourhood Area (as of December 2024, in alphabetical order)	Total (minimum) Housing Requirement (01/04/20 to 01/04/42) - All known supply sources (completions, commitments and DPD allocations, excluding new community*)	Minimum Residual Housing Requirement (Provision through emerging/future Neighbourhood Plan)
All Saints	2	0
Axminster	1,404	0
Axmouh	4	0
Aylesbeare	8	0
Beer	44	0
Bishops Clyst* (Clyst St Mary and Sowton)	169	72
Broadclyst	2,382	0
Broadhembury	39	0
Budleigh Salterton	182	0
Chardstock	30	0
Clyst Honiton*	11	0
Clyst St George	599	0
Colyton and Colyford	169	0
Cotleigh	0	0
Dalwood	2	0
Dunkeswell	72	0
East Budleigh with Bicton	30	0
Exmouth	2,411	0
Farringdon*	5	0
Feniton	127	0
Hawkchurch	17	0

Designated Neighbourhood Area (as of December 2024, in alphabetical order)	Total (minimum) Housing Requirement (01/04/20 to 01/04/42) - All known supply sources (completions, commitments and DPD allocations, excluding new community*)	Minimum Residual Housing Requirement (Provision through emerging/future Neighbourhood Plan)
Honiton	839	0
Kilmington	59	0
Luppitt	2	0
Lympstone	227	0
Membury	4	0
Monkton	1	0
Newton Poppleford	76	0
Otterton	35	0
Ottery St Mary	483	0
Payhembury	38	0
Plymtree	42	0
Rockbeare	806	0
Seaton	522	0
Sidmouth (Sid Valley)	471	0
Stockland	3	0
Uplyme	44	0
Upottery	3	0
West Hill	70	0
Whimple	611	0
Woodbury	366	0
Yarcombe	6	0

These figures represent the **minimum** expected scale of housing development in each of the Designated Neighbourhood Areas over the plan period.

Proposals for additional housing, including through allocations in neighbourhood plans to meet a specific local need will be supported where they are in accordance with other strategic policies in this Plan and supported by appropriate evidence.

For future new (and/or amended) Designated Neighbourhood Areas, the Local Planning Authority will provide an indicative figure, if requested to do so by the neighbourhood planning body.

### **Justification for inclusion of policy**

- 3.9. The housing requirements included in this policy are calculated using a comprehensive methodology that accounts for housing completions, existing commitments, and allocations from development plans. Neighbourhood areas will have specific housing provisions that contribute to the district's overall housing strategy. These figures represent net new dwellings, allowing for units lost to demolition or conversion.
- 3.10. The policy is designed to provide clarity and flexibility for local communities. The housing figures are minimum requirements, not maximum limits, enabling neighbourhood plans to allocate additional sites or exceed the specified numbers. Neighbourhood planning bodies are encouraged to consider site allocations (with the exception of Bishops Clyst – see Policy SD14), though there is no mandatory obligation to do so.
- 3.11. Key considerations include: housing supply is based on the 2024 monitoring point, windfall developments are not included in individual DNA calculations, and the local planning authority will support communities in their planning efforts. The approach balances district-wide housing needs with local community aspirations.
- 3.12. A detailed breakdown of housing requirements for each Neighbourhood Area, is available on the East Devon District Council website and will be updated annually through the Housing Monitoring Update.

## **Economic Vision and Strategy**

- 3.13. This section outlines the local plan's economic strategy, focusing on creating a resilient, sustainable, and inclusive economy for East Devon. The approach aims to support economic growth while addressing key challenges such as low wages, changing workforce dynamics, and the transition to a net-zero economy.

- 3.14. The strategy emphasises supporting innovation, attracting new sectors, and modernising existing industries. Key priorities include fostering transformational sectors, supporting local businesses, and creating opportunities for well-paid, productive careers. Particular attention is given to emerging technologies, green industries, and adapting to changes like increased homeworking and artificial intelligence.
- 3.15. The plan recognises significant economic challenges, including the loss of major employers, lower-than-average wages, and demographic shifts with an ageing population. It seeks to address these by promoting economic diversification, supporting new settlements like Cranbrook, and ensuring land and infrastructure are available to support business growth and innovation.
- 3.16. Central to the strategy is a commitment to sustainable development, balancing economic prosperity with environmental protection and social well-being, while preparing for future economic and technological transformations.

### **Policy for employment provision and distribution**

- 3.17. To support job opportunities and business growth, the local plan must ensure a strategic approach to employment provision and land supply.

### **Strategic Policy SP04: Employment Provision and Distribution Strategy**

The Council is committed to achieving high quality, high value jobs in East Devon, close to people's homes. Employment provision will consist of:

- Sites allocated in this plan (not at new communities) – XXX hectares TBC
- Sites at Cranbrook – 18.40ha
- Sites at 2nd new town (up to 2042) – around 17.5ha
- Sites built 2020-2024 – XXX TBC
- Total – XXX
- Sites with planning permission or under construction at 2024 – 44ha

This level of provision gives range and choice when measured against a quantified forecast need of 80 hectares set out in the Economic Development Needs

Assessment<sup>5</sup> (mid-point clean growth scenario) and ongoing monitoring work.

Employment uses will include:

**E(g)(i) Office use**- to be primarily located in the town centres of tier 1 and 2 settlements and the proposed new settlement. Office use will be permitted on site allocations as an ancillary part of other business uses.

**E(g)(ii) Research and Development and (iii) industrial use** (which can be carried out in any residential area without causing detriment to the amenity of the area)- will be met through employment site allocations, alongside larger housing developments as allocations and as windfall development.

**B2 General Industrial use**- the majority of this provision will be met through site allocations in the West End.

**B8 Storage and Distribution use**- the majority of this provision will be met through site allocations in the West End.

Other employment generating development, such as sustainable green rural tourism and leisure development will be permitted in accordance with other Plan Policies.

Existing employment areas that will continue to be the primary locations for industrial, warehousing, offices, distribution development and other B Class Uses are identified on the Policies Map. Employment site allocations are identified on the Policies Map and will be subject to site specific Policies in the plan.

## Justification for inclusion of policy

- 3.18. The Council Plan and Economic Development Strategy highlight that a resilient economy promotes prosperity and reduces hardship. This policy ensures adequate employment development for the plan period, meeting the needs of new and growing businesses, locating quality jobs near communities, and collaborating with partners to supply quality employment spaces.
- 3.19. The EDNA evaluates East Devon's employment land needs for 2020-2040, focusing on offices, industry, and warehousing. It concludes a need for 7 ha of

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<sup>5</sup> Greater Exeter Economic Development Needs Assessment, 2023:  
<https://eastdevon.gov.uk/media/flflexie/greater-exeter-edna-final-report-combined-v2-0.pdf>

land for offices, 65 ha for industrial use, and 8 ha for logistics. These fall under Use Classes B2, B8, and E(g).

3.20. As of November 2022, the estimated demand was 506,163 sqm for industrial uses and 2,267 sqm for offices, with available floorspace at 4,913 sqm (industrial) and 11,908 sqm (offices). Remaining demand is expected to be met through developments already planned or under construction at 2024.

3.21. The Plan allocates suitable sites to meet employment floorspace requirements, offering flexibility and choice. Most sites support mixed B2, B8, and E(g) uses, except in residential areas where general industry and warehousing/logistics are restricted to protect local amenity.

Policy reference and address	Uses permitted	Amount of employment land (ha)
<b><u>Allocations in the West End</u></b>		
Strategic Policy WS01: Development of a second new town east of Exeter	Not Specified	TBC
Strategic Policy WS04: Land north of the Science Park (Brcl_23)	E(g)(iii)	2
Strategic Policy WS06: Employment land to the east of the airport buildings (Site GH/ED/43, GH/ED/45 and Rock_09a)	B2, B8, E(g)	24.34
Strategic Policy WS07: Employment land north of the Airport, adjoining Treasbeare (Clho_09)	B2, B8, E(g)	15.3
Strategic Policy WS08: Employment land opposite the airport buildings, south of the A30 (site Farr_01)	B2, E(g)	1
Strategic Policy WS09: Development next to the M5 and north of Topsham	Not specified	2.4
Strategic Policy WS12: Employment land at Sandygate, between the M5 and Clyst Road (site Clge_07)	B2, E(g)	0.7
Strategic Policy WS13: Employment land at Lodge Trading Estate, Station Road, Broadclyst (site Brcl_27a)	B2, E(g)	1.89
Strategic Policy WS14: Employment land south of Langdon's Business Park, Clyst St Mary (site Sowt_15a)	B2, B8, E(g)	1



Strategic Policy WS15: Employment land at Darts Farm (Clge_23 and Clge_25a)	E(g)	2.13
<b><u>Allocations at Tier 1-2 Settlements</u></b> Note - land is not allocated at Sidmouth as a large employment site already has an extant planning permission		
<b>Strategic Policy SD01: Exmouth and its future development:</b>		
Land to the South of Littleham (Exmo_17)	E(g)	1.6
Land directly to the East of Liverton Business Park (Exmo_18)	B2, B8, E(g)	2.7
Land at St John's (Exmo_20b)	E(g)(iii)	2
Land at Courtlands Cross (Lymp_07)	E(g)(iii)	0.4
<b>Strategic Policy SD02: Axminster and its future development:</b>		
Prestaller Farm, Beavor Lane (Part of GH/ED/80 )	E(g)(iii)	1
Land west of Chard Road (GH/ED/83)	E(g)(iii)	0.8
Land west of Musbury Road (Axmi_01a)	B2, B8, E(g)	2
Land east of Musbury Road (Axmi_02 and Axmi_08)	E(g)(iii)	0.6
Land at Axminster Carpets (Axmi_07)	E(g)	Up to 0.5
Great Jackleigh Farm (Axmi_09)	E(g)	1
Land east of Lyme Close (Axmi_11a)	E(g)	0.4
<b>Strategic Policy SD03: Honiton and its future development:</b>		
Land on the western side of Hayne Lane, Gittisham (Gitti_03)	B2, B8, E(g)	5.5
Land to the West of Combe Garden Centre, Gittisham (Gitti_04)	B2, B8, E(g)	9.1
Employment Land within the Existing Heathpark Industrial Estate- plots 11A,11B,11D and 11M	B2, B8, E(g)	3.3
<b>Strategic Policy SD04: Ottery St Mary and its future development</b>		
Barrack Farm (Otry_01b)	E(g)(iii)	1.25
<b>Strategic Policy SD05: Seaton and its future development:</b>		
Land off Harepath Road (Seat_05)	E(g)	2.2

<b><u>Allocations at the Tier 3 and 4 Settlements</u></b>		
Strategic Policy SD07: Development at Broadclyst (Brcl_12)	E(g)	0.6
Strategic Policy SD17: Development at Feniton (Otry_20)	B2, B8, E(g)	4.64
Strategic Policy SD18: Development at Hawkchurch (Hawk_01)	E(g)	0.25
Strategic Policy SD20: Development at Musbury (Musb_01a)	E(g)(i)	0.06

- 3.22. The policy ensures sufficient employment land is allocated to support economic growth. The Council will monitor and seek to maintain an appropriate mix of uses throughout the plan period.
- 3.23. West End employment sites and new settlements support high-value jobs and strategic inward investment, especially in emerging technology sectors. Employment growth at Tier 1-4 settlements aims to meet local needs and improve self-containment. New jobs will be required alongside new housing on larger development allocations.

## **Settlement Boundaries**

- 3.24. Settlement boundaries are essential for identifying areas suitable for development. They serve three main purposes:
- Define where development is acceptable to promote sustainable development.
  - Control the scale and location of development to implement the plan strategy.
  - Prevent unregulated development in the countryside and open areas.

### **Strategic Policy SP05: Development inside Settlement Boundaries**

Within the settlement boundaries defined on the Policies Map development will be supported in principle. This does not mean that all development will be acceptable within settlement boundaries: proposals will be considered on their own merits having regard to other policies in this plan and any made neighbourhood plan.

This is a strategic policy and significant changes to the boundaries defined through neighbourhood planning would be incompatible with it. However, neighbourhood plans that propose modest adjustments to the settlement boundaries to increase

the opportunities for additional development are likely to be compatible with this policy.

### **Justification for inclusion of policy**

- 3.25. Settlement boundaries direct growth to areas that align with our plan objectives, providing clarity on where development is likely to be acceptable. This offers certainty to decision makers, local communities, landowners, and developers.
- 3.26. Settlement boundaries have been established around Tier 1 to Tier 4 settlements (excluding Stoke Canon which is wholly in flood zones 2 and 3). Large strategic development sites may also have boundaries or clear allocations for development. The Settlement Boundaries Evidence Paper details the rationale for their delineation.
- 3.27. These boundaries help manage growth patterns in line with national planning guidance, guiding but not stifling outward growth. Some built-up areas may be excluded from these boundaries if deemed inappropriate for additional development. Outside settlement boundaries, development is more restricted under separate plan policies.

### **Land outside of settlement boundaries**

- 3.28. East Devon is predominantly rural, renowned for its outstanding natural environment. Our strategy directs growth to the new settlement and Tier 1 to Tier 4 settlements, aligning with the National Planning Policy Framework (NPPF) to promote sustainable development. This approach ensures development is concentrated in areas with existing infrastructure and services

### **Strategic Policy SP06: Development beyond Settlement Boundaries**

In locations outside of the defined settlement boundaries development will not be permitted unless it is in accordance with a specific Local or Neighbourhood Plan policy that explicitly permits such development.

### **Justification for inclusion of policy**

- 3.29. This policy is crucial for implementing the local plan strategy, managing growth in line with national planning policy. By focusing development within defined settlement boundaries, we promote sustainable development patterns and limit

inappropriate development elsewhere. This helps to maintain the character and quality of East Devon's rural areas and natural landscapes.

- 3.30. Settlement boundaries provide clarity and certainty for decision makers, local communities, landowners, and developers about where development is likely to be acceptable. This policy supports the strategic focus on sustainable growth while balancing the needs of rural communities for appropriate development opportunities.
- 3.31. Land outside settlement boundaries is treated as 'countryside' in planning terms, even if it includes built-up areas. Such areas are generally unsuitable for development unless explicitly permitted by policy. This approach allows for flexibility to meet specific needs, such as affordable housing to address local needs or the conversion of existing buildings, while ensuring that development is controlled and sustainable. This balance is essential to protect the rural character and environmental quality of East Devon while accommodating necessary growth.

## **Infrastructure**

- 3.32. Effective infrastructure delivery is crucial for supporting new development and ensuring the well-being of the wider community. This policy outlines the requirements for infrastructure provision in new development proposals.

### **Strategic Policy SP07: Delivery of infrastructure**

New development proposals must be supported by appropriate infrastructure, delivered in a timely manner to support the needs of the development and the wider community. Applications will be required to:

1. Assess the infrastructure requirements arising from their development.
2. Provide or contribute towards necessary infrastructure improvements, either through direct provision or financial contributions.
3. Ensure that infrastructure to be delivered by the development is delivered in parallel with the progress of the development.
4. Coordinate with relevant service providers and the Local Planning Authority to ensure efficient and effective infrastructure delivery.
5. Consider the long-term maintenance and management of new infrastructure.

Where appropriate, the Council will use planning conditions or planning obligations to secure the provision of infrastructure and its ongoing maintenance.

### **Justification for inclusion of policy**

- 3.33. Proper infrastructure provision is essential for creating sustainable communities that meet the needs of residents and businesses. Adequate infrastructure supports a high quality of life and ensures access to essential services and amenities.
- 3.34. Well-planned infrastructure attracts investment and supports economic growth. It also helps mitigate environmental impacts, such as through sustainable drainage systems or green transport options.
- 3.35. The East Devon Infrastructure Delivery Plan (IDP) provides a comprehensive assessment of the district's infrastructure needs and priorities. Developers should consult the most recent version of the IDP when assessing infrastructure requirements for their proposals.
- 3.36. This policy aligns with the National Planning Policy Framework (NPPF) requirements for plan-making and the use of planning obligations. By requiring developers to contribute to infrastructure needs, the policy ensures that the cost of supporting growth does not fall disproportionately on existing communities.
- 3.37. A coordinated approach to infrastructure delivery is encouraged, promoting collaboration between developers, the local authority, and service providers. Considering the long-term maintenance of infrastructure helps ensure the ongoing viability and effectiveness of new facilities and services.

## Chapter 4. Development at the West End

- 4.1. The West End of East Devon, near Exeter, has seen significant development recently. This local plan continues to support high growth in this area, with projects including district heating, green infrastructure, the Growth Point programme, the Enterprise Zone, improved highways, and climate emergency responses. Past policies focused on this area due to development constraints in other parts of East Devon, with much of the district in designated National Landscapes. The existing built environment near Exeter provides jobs, services, infrastructure, and market demand for housing and employment development. These factors remain relevant, with much future development already planned or underway, particularly at Cranbrook. The West End, and its growth, will provide economic and job benefits, including in respect of enhancing skill levels and education and training, for all of East Devon and a wider area.
- 4.2. Continued growth in the West End will leverage existing infrastructure and necessitate additional facilities, especially for the second new town. The 'West End' is not defined by a map line but refers to development proposals and sites discussed in this chapter.

### Planning for a Second New Town

- 4.3. To accommodate significant housing growth, the local plan allocates land for a new town in the West End, near Exeter. Extensive research and assessment have identified and allocated a site for the new town, shown on the Policies Map.



FIGURE 5 New houses at Cranbrook

- 2.4 In technical assessment work [East Devon Options Appraisal Report.pdf](#) there is a vision of the new town, this states:

*A second new settlement in East Devon with a self-sufficient, healthy and dynamic community with distinctive character. Delivering up to 8,000 high-quality homes with a range of tenures, places of work and a diverse mix of uses that are easily accessible via sustainable and active travel such that these become the dominant transport modes.*

*This new town will be more than just a settlement, it will be an ambitious and highly desirable place that supports the growth of a self-governing and self-sustaining community that establishes its culture at the outset in order to develop and thrive into the future.*

*The structure of the settlement will promote innovative design that will draw inspiration from the local context, including the unique surrounding historic environment, to create a rich character. Streets and spaces will be designed to encourage social interaction and will be embedded in a well-connected and integrated active travel network with comprehensive links to nearby employment, surrounding countryside and the city of Exeter.*

*It will be underpinned at its core by sustainability, wellbeing, and healthy living, creating an exemplar zero-carbon town both in terms of self-sufficiency and design and by doing so it will provide a legacy to the benefit of future generations.*



*This sustainable community will be sensitively and seamlessly integrated with the outstanding East Devon natural environment and contribute to the delivery of the Clyst Valley Regional Park whilst protecting nearby internationally recognised habitats.*

*It will provide a rich network of substantial open space and diverse landscaping, including areas of enhanced ecology and biodiversity, as well as opportunities for play, recreation and opportunities for food growing.*

*This vibrant and adaptable new settlement will preserve East Devon's legacy as an outstanding place to live. The use of local materials and labour will be promoted to deliver on local priorities, creating somewhere residents can be proud of and where people of all ages and lifestyles will prosper.*

## **Strategic Policy WS01: Development of a second new town east of Exeter**

To meet the needs of a growing population a new town will be developed on the eastern side of East Devon. The new town will be a long-term strategic development scheme that will start being built during the life span of this local plan but development will extend beyond the life of this plan.

Ultimately the new town will need to accommodate at least 10,000 new homes and associated mixed use development and infrastructure. In the first instance, the land allocated in this plan further to this policy is for the new town to accommodate at least 8,000 new homes, some to be completed before 2042 and some after. The further land to be allocated to accommodate further housing numbers and associated mixed use development and infrastructure so the new town can accommodate at least 10,000 new homes will be determined through further work and be set out in subsequent development plans.

For the first 8,000 new homes, and supporting facilities and development, land is allocated, as shown on the Policies Plan. This policy sets out requirements to get to this scale of development but all planning and infrastructure capacity and needs work for the new town should take into account accommodating greater levels of development, to accommodate at least 10,000 new homes and associated development.

Development will need to occur and proceed on the basis of an agreed whole new town masterplan and on an agreed phased basis. The new town will be built to distinctive high quality design standards with an explicit focus on sustainable construction and building operation and renewable energy production and use. Open spaces and facilities will be readily accessible to all residents with convenient and attractive pedestrian and cycle links within the site and to local destinations and access to high quality public transport services.

Working with our partners we will promote development starting in this plan period but also extending over the longer term (beyond the lifespan of this local plan) to accommodate the following:

### **New homes**

Up to 2042 - Around 3300 new homes on allocated land.

Beyond 2042 – Around 4700 additional new homes on allocated land.

Noting that at least a further 2,000 new homes and associated development will also be required to be accommodated in the longer term to be allocated in subsequent development plans.

New homes will need to be of the highest standards in terms of energy and resource efficiency, quality of design and access to services and facilities while making efficient use of land.

The allocation-wide Masterplan will set out the required levels of affordable housing, mix and size of housing and tenure types and area densities, which are expected to be:

- o 35% affordable housing in accordance with strategic policy HN02;
- o a mix of types and sizes of market housing in accordance with strategic policy HN01; and
- o a site-wide average density of at least 45 dwellings per hectare.

High density housing of at least 55- 60 dwellings per hectare will be required within the town centre, neighbourhood centres and around key destinations and transport hubs.

### **Gypsy and Traveller Provision**

Up to 2042 – One or more sites accommodating at least 15 pitches.

Beyond 2042 – One or more additional site or sites accommodating at least 15 additional pitches.

Provision will be required in line with ‘bricks and mortar’ housing development and must be integrated with the new town’s overall development proposals

### **Jobs**

Up to 2042 – At least 17.5 hectares of land in office, industrial and warehouse sectors (E, B2 and B8).

Beyond 2042 – Around 30 hectares of land in office, industrial and warehouse sectors (E, B2 and B8).

Employment provision shall be made throughout the town to provide a range of spaces suitable for the needs of businesses as they develop and grow and to accommodate a range of employment opportunities for residents of the new town and surrounding areas.

Serviced or otherwise available land should be available for occupation by employment uses on a phased basis that is directly proportionate to house building occupations.

### **Town Centre**

Up to 2042 – Allocation of 15 hectares of land for a town centre with completion of at least 5 hectares of land with completed and operational town centre uses, specifically to include retail, business and leisure uses.

Beyond 2042 – Completion of additional town centre development to occupy a grand total of at least 15 hectares of land (pre and post 2042 development).

A town centre will provide a focal point for retail, business and leisure activities and will be designed to create a vibrant day and night-time economy and this will

be complemented by a series of smaller neighbourhood centres that will be built out alongside the homes that they serve.

### **Social, Community and Education Facilities**

Accommodate a full range of social, cultural, sport, leisure, health, community and education facilities (including new primary schools and a secondary school and a special educational needs school) to meet the needs of all age groups that will live at the new town. To specifically include 23 hectares of land for education provision.

### **Infrastructure**

Infrastructure provision will need to come forward with overall development proposals. This will include at least 254 hectares of land for green [and blue] infrastructure provision (including approximately 150Ha of Suitable Alternative Natural Greenspace (SANG) to meet Habitat Regulations requirements. The Council will produce an Infrastructure Delivery Plan that will set out key requirements recognising the need for improved transport links, public rights of way network, cycle networks, bus services and road improvements, district heating connections, on-site renewable energy generation, drainage and SUDS requirements, new education provision, high speed broadband and other services and facilities to ensure sustainable development is delivered.

Developments shall be developed in a phased and co-ordinated manner alongside the required infrastructure and in accordance with parameter plans for the new town which will be developed in partnership with developers and the community.

Proposals to develop land within the new town must progress in accordance with an allocation-wide masterplan, Infrastructure Delivery Strategy (to accord with the Infrastructure Delivery Plan produced by the Council), Phasing Strategy and Financial Appraisal which will have been submitted to and approved by the local planning authority prior to commencement of any development. Each planning application to be determined within the allocation area should accord with such approved documents unless otherwise agreed by the local planning authority. The allocation-wide Infrastructure Delivery Strategy will demonstrate that the development of the whole of the allocation area will deliver, in a timely manner, sufficient infrastructure to cater for the needs of the new town as a whole and

also mitigate to an acceptable level the effects of the whole development upon the surrounding area and community.

Each planning application shall incorporate details of phasing and trigger levels for the provision of required infrastructure consistent with this policy and the Infrastructure Delivery Strategy. This must include proposals for the number and phasing of dwellings to be permitted, and the timing of housing delivery to be linked to the planned delivery of infrastructure. This will be regulated through the planning application process. Ad hoc or piecemeal development which is contrary to the aims of this policy or development that is inconsistent with the required masterplan for this site will not be permitted. Any development proposal which comes forward must demonstrate that the development does not compromise the ability to deliver the infrastructure required by this allocation and identified in this policy and the Infrastructure Delivery Strategy and does not prejudice the future integration of future development at the new town beyond this plan period.

In appropriate cases the Council, another government or public sector body or relevant landowners/developers may forward-fund and bring forward delivery of a specific item or items of infrastructure that is required for this allocation in the Infrastructure Delivery Plan and compulsory purchase powers may be used in order to deliver such items of infrastructure if required. Development proposals within the new town allocation (or benefitting from the infrastructure provided as part of the new town allocation) will be expected to contribute towards the infrastructure required by this allocation on a pooled and, where applicable, on a retrospective basis (i.e. a contribution will still be required, even where the infrastructure has already been built and/or fully or partially funded, including through forward-funding to ensure a fair and consistent apportionment of infrastructure costs across the new town). Such contributions may be sought on a framework section 106 basis to ensure that they are fairly and consistently apportioned between the development sites for the new town and may be applied by the Council to reimburse or offset such funding or provision by the Council, other government or public sector body or any relevant landowner/developer. As the final costs of the relevant infrastructure may not be known at the time, planning obligations requiring a contribution towards that infrastructure may also, where appropriate, contain a mechanism for review once the infrastructure has been fully paid for and constructed so as to secure payment of the appropriate final level of contributions to cover the costs of the infrastructure.

### Meanwhile uses

Whilst waiting for land parcels to come forward for development, and in empty spaces created, appropriate 'meanwhile uses' will be actively encouraged. These 'meanwhile' uses are not expected to be permanent but they will allow social, cultural, business or environmental activity and enterprise to occur on spaces that could otherwise lie vacant or underused.

**Waste transfer station** – the development is to include a new waste transfer station that is to be completed and capable of operation.

### Justification for inclusion of policy

- 4.4. The local plan provides for a second new town near Exeter. The scale of development will ensure a wide range of services and facilities, supported by substantial infrastructure provision. Key facilities, including a secondary school, will be planned and built to serve the new town and surrounding areas.
- 4.5. The new town will take time to develop, with new homes expected around 2030. With build-out rates of 300+ homes per year we would anticipate around 3,300 homes to be constructed by 2042 and so significant development will extend beyond the local plan's 2042 end date, continuing into the mid-21st century.

### The Enterprise Zone

- 4.6. Enterprise zones are designated areas where employment and business growth are actively encouraged, offering a simpler planning regime and incentives to investors. Enterprise zones in the West End of East Devon, including the Science Park, Skypark, and Exeter Logistics Park, have driven significant growth in high-value jobs. Supported by the Enterprise Zone designation, this area, alongside Exeter International Airport, focuses on employment concentration, clean growth, and economic benefits for the wider district.
- 4.7. Clean growth, defined by the government as increasing national income while reducing greenhouse gas emissions, is central to the UK's industrial strategy. East Devon aims to achieve this through low and zero carbon development, district heating networks, and leveraging expertise at Exeter Science Park.
- 4.8. The Exeter and East Devon Enterprise Zone covers four areas, including a designated area within Cranbrook. The Council will continue to support employment-generating development within these sites, ensuring policy coverage is maintained.

- 2.5 One of the designated areas falls within Cranbrook. Cranbrook benefits from its own adopted plan which provides detailed policy coverage of the new town including the town centre which is also covered by a masterplan. Some policies in the plan also apply to some parts or all of the area shown by the Cranbrook Plan.

## **Strategic Policy WS02: Development within the Enterprise Zone**

Within the designated Enterprise Zone as shown on the Policies Plan support will be given for inward investment and development for business and allied uses.

All new development will need to be complementary to the existing use and purposes of the Enterprise Zone area and its specific vision for development.

New buildings will need to connect to the district heating network on Science Park and Sky Park.

In the designated Enterprise Zone a range of building types and sizes, to maintain a flexible and competitive offer will be allowed for. However, other than at Exeter Logistics Park, large-scale warehousing and distribution development within the Enterprise Zone will only be allowed:

- as a limited part of a mixed-use scheme and
- providing it will not compromise the ability of those sites to deliver significant high value employment

## **Justification for inclusion of policy**

- 4.9. The Enterprise Zone designation has been successful, and the aim is to build on this success. The focus will continue on developing Local Development Orders (LDOs) to support economic growth. An LDO grants planning permission for specific development proposals or classes of development in defined locations, streamlining the planning process and encouraging investment. LDOs provide clarity and certainty for development, sitting alongside local plan policy to detail appropriate development for the sites. They enable fast-track development to support businesses and job creation.

- 4.10. Current LDOs include:

- District Heating
- Power Park, Exeter

- 1.7 The Council is developing an LDO for Sky Park.



## Exeter Science Park

- 4.11. Exeter Science Park, located northeast of Junction 29 of the M5 motorway, is connected with Exeter University, leveraging its academic excellence. The park supports and encourages companies in science, technology, engineering, mathematics, and medical fields to thrive. Since the early 2010s, Exeter Science Park has grown rapidly, attracting high-quality businesses and significant new investment.

### Strategic Policy WS03: Exeter Science Park

At the Exeter Science Park, as shown on the Policies Map the following uses will be acceptable:

- research and development of products or services;
- active collaborations with universities, higher education, institutes, research or similar organisations;
- technology based services;

Uses which support the above primary activities and supporting green and grey infrastructure will also be accommodated.

New business developments will need to be of the highest quality built in a campus style setting, to reflect the existing Science Park development, with a particular emphasis on provision of high environmental quality and standards.

Other than for supporting infrastructure planning permission will not be granted for built development that comprises of non-business or for businesses that do not accord or align with Science Park objectives.

### Justification for plan policy

- 4.12. To meet future needs, the current development approach for the Science Park will continue. The existing 'gateway policy' (a legal agreement related to the original planning permission) will be maintained to ensure developments contribute to transformational economic impacts. This policy addresses the types of business uses allowed at the Science Park and their operations

## Development of land north of Exeter Science Park

- 4.13. Land north of Exeter Science Park offers potential for high-quality mixed-use development, including housing and small business units.

### Strategic Policy WS04: Land north of the Science Park (Brcl\_23)

An area of around 4.3 hectares north of the Science Park, as shown on the Policies Map, is allocated for:

- a mix of housing (90 dwellings on 2.3ha)
- small business units (2ha) in E(g)(iii) use and
- supporting green and grey infrastructure.

New development will need to be of the highest quality with a particular emphasis on provision of high environmental quality and standards.

### Justification for plan policy

- 4.14. To continue employment growth in the West End of East Devon, additional land is allocated for job-generating uses. This site, north of the existing Science Park and east of the M5 Motorway, may experience noise impacts, affecting suitability for some non-employment uses. Therefore, 2ha to the west of the site is allocated for small, high-quality business units to meet local demand, with the remaining 2.3ha allocated for housing.

### Exeter Airport and development in the environs

- 4.15. Exeter Airport is strategically important for travel and communications in the south-west of England, serving as a key asset for East Devon and surrounding areas. Plan policy supports the airport's future operation and growth, promoting it as a gateway to the region and a hub for high-skilled, high-value job creation in aviation and other sectors.

## Strategic Policy WS05: Exeter International Airport and its future operation and development

Growth and expansion of the airport and airport related businesses and operations will be supported within its current operational boundaries. The role of the Airport as a test bed for new technologies will be supported through promoting the development of a sustainable aviation cluster.

Within airport operational boundaries, as shown on the Policies Map:

- Land to the north of the runway will be allowed to support aviation related development including research and development activity alongside maintenance/repair/overhaul and new freight/cargo operations.
- Land to the south will be allowed to accommodate further aviation related, employment and training/education uses. This can include occupiers who rely on proximity to an Airport or who benefit from a transferrable skill base as well as to support the developing logistics cluster.

Any new developments must not, however, prejudice or adversely impact on the core operational role and functions of the airport as a travel facility handling the air bound movements of passengers and freight.

Beyond airport operational boundaries noise sensitive development within the 57db noise contour around the airport will be restricted (in order to ensure future airport operations are not adversely impacted) alongside ensuring that any development proposals do not have a material impact on the operation of navigational and safety systems.

The transition to net zero carbon operations at the airport will be supported through enhanced public transport surface access and the installation of renewable energy generating capacity.

### Justification for plan policy

- 4.16. Exeter Airport is a key gateway to the region, supporting market access, tourism, and serving as a base for the Devon Air Ambulance, National Police Air Service helicopters, and the Royal Mail flight. Exeter Aerospace provides maintenance, repair, and overhaul operations, while the Future Skills Centre offers training for high-tech jobs.

- 4.17. The Local Plan aims to safeguard current operations and support future growth, particularly towards sustainability. Exeter Airport has the potential to be a testbed for new aviation technologies and propulsion modes, contributing to a sustainable aviation cluster. This aligns with the global challenge to decarbonize aviation, supported by initiatives like the Future Flight programme.
- 4.18. Opportunities exist for further development north and south of the runway. The north can support research and development and new cargo markets, while the south can accommodate commercial development and expand education and training facilities.
- 4.19. It is essential that new development does not compromise the airport's safe operation, considering noise sensitivity and the safeguarding of navigational and safety systems.

### **Employment land east of the Airport buildings**

- 4.20. Power Park, a 7.7ha site, benefits from a Local Development Order allowing up to 26,000 sqm of employment space. Land is allocated for various employment uses south and east of Power Park and the airport terminal buildings, as shown on the Policies Map. This site is ideal for high-technology airport-related uses and clean green technology, which should be integral to the masterplan.

#### **Strategic Policy WS06: Employment land to the east of the airport buildings (Site GH/ED/43, GH/ED/45 and Rock\_09a)**

An area of 24.34 hectares of land, east of existing airport buildings and lying either side of Long Lane, is allocated for employment uses.

The site will form a mixed-use business park and the following uses will be considered appropriate:

- B2
- B8
- E(g)
- A limited element of ancillary uses such as indoor sports, recreational or café will be permitted but only where strictly supporting and subordinate to the development of the above employment uses.

With its proximity to Exeter Airport the site is well positioned to assist the role of the airport. Uses which relate to the aviation sector and its wider supply chain will

be particularly supported alongside other high value employment uses that facilitate economic growth within the area.

This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented, including measures to provide fully for its infrastructure requirements and appropriate mechanisms for apportionment of development costs and contributions across separately owned land parcels. Planning permission will not be granted for any individual parcel of land in the allocation in the absence of this Masterplan.

The masterplan will need to demonstrate that the following will also be achieved/undertaken:

- Traffic mitigation to avoid additional traffic negatively impacting on the operation of the local highway network.
- safe cycle and pedestrian access to nearby facilities
- protection of the County Wildlife Site
- archaeological assessment to ensure that any impact on the historic WWII airfield is minimised and mitigated
- heritage impact assessment and mitigation taking account of nearby heritage assets (including Grade I listed Rockbeare Manor and its associated Grade II Registered Historic Park and Garden) with careful consideration of setting, building height, design, and landscaping.
- A comprehensive site-specific Flood Risk Assessment is to be undertaken to assess the risk of surface water and groundwater flooding in relation to the proposed development, and the access and egress arrangements and development should be placed outside of the areas at risk from surface water flooding.
- Infiltration rates are to be assessed on site as part of a drainage strategy and there is to be early engagement with the LLFA and the EA on the proposed SuDS measures and infiltration rate.

## **Justification for plan policy**

4.21. The proposed allocation provides strategic-scale employment opportunities next to Power Park and airport buildings. Uses supporting airport-related and aeronautical business activities will be central to the masterplan, promoting high-skilled, high-quality green job growth. The site's proximity to the airport and other

development sites enhances its attractiveness for businesses and educational establishments.

- 4.22. Sustainability improvements, including Long Lane enhancements and the Silverdown Link bus loop/cycleway are enabling increased employment density and improved public transport viability.
- 4.23. The site is within a Nitrate Vulnerable Zone and Impact Risk Zones for the Exe Estuary SPA and East Devon Pebblebed Heath SPA and SAC, requiring careful management of water discharge and air pollution impacts.

### **Employment land north of the Airport, adjoining Treasbeare**

- 4.24. Land is allocated for employment uses to the north of the Airport, as shown on the Policies Map. The site is particularly suited to light and general industrial development.

#### **Strategic Policy WS07: Employment land north of the Airport, adjoining Treasbeare (Clho\_09)**

An area of 15.3 hectares of land, as shown on the Policies Map to the north of the airport, is allocated for employment uses. The following uses will be considered appropriate;

- The majority (or all) to be B2
- With the remainder (if any) B8 and E(g)

The development will need to come forward in accordance with an approved phasing plan and promote active travel measures and other than for supporting infrastructure planning permission will not be granted for built development that comprises of non-business uses.

Development proposals for the site must be accompanied by measures to provide fully for its infrastructure requirements and a new access onto London Road capable of safely accommodating the level of traffic likely to be generated when the site is at capacity.

This allocation will need to be supported by further flood risk assessment and measures to ensure that safe cycle and pedestrian access to nearby facilities can be achieved.

Archaeological assessment will be required prior to development commencing to ensure that any impact on the historic WWII airfield is minimised and mitigated.

## Justification for plan policy

- 4.25. Land north of Exeter Airport, south of the old A30, is allocated primarily for general industrial use due to its location near the airport runway and associated noise impacts. Storage and distribution are permitted if new access arrangements and the local highway network can safely accommodate the traffic. Development proposals must be based on further environmental, heritage, and traffic assessments, with appropriate mitigation if required.
- 4.26. The site is within an Impact Risk Zone for the Exe Estuary SPA, which may be triggered by water or liquid waste discharge of more than 20m<sup>3</sup>/day. The Impact Risk Zone for the East Devon Pebblebed Heath SPA and SAC may be triggered by industrial development causing air pollution.

## Employment land at Wares Farm, opposite the Airport buildings, south of the A30

- 4.27. A small piece of land is allocated for employment uses on the southern side of the A30, opposite the airport buildings. The site is shown on the Policies Map and is suitable for small business or start-up units.

### 16. Strategic Policy WS08: Employment land opposite the airport buildings, south of the A30 (site Farr\_01)

An area of 1 hectare of land, as shown on the Policies Map, is allocated for small business units. The following uses will be considered appropriate;

- B2
- E(g)

Archaeological assessment will be required prior to development.

Site-specific Flood Risk Assessment is required and development should be placed outside of the areas at risk from flooding.

This site will require private sewage/drainage measures and infiltration rates must be assessed on site as part of a drainage strategy.



## **Justification for plan policy**

- 4.28. Land south of the A30 is allocated for small business or start-up units to offer flexibility and meet the need for smaller, less expensive premises not otherwise available in this area. Occupiers may provide supporting services to nearby residents and businesses at the airport.
- 4.29. The site is within a Nitrate Vulnerable Zone and Impact Risk Zone for the Exe Estuary SPA, which may be triggered by water or liquid waste discharge of more than 20m<sup>3</sup>/day to ground or surface water. Additionally, the Impact Risk Zone for the East Devon Pebblebed Heaths SPA and SAC may be triggered by industrial development causing air pollution.

## **The ongoing development and potential for expansion of Cranbrook**

- 4.30. Cranbrook is a new town under construction on the western side of East Devon, about 5 km from the M5 Motorway and Exeter City boundary. Since starting from a green field in 2011, it has grown to around 3,000 homes by the end of 2021. The Cranbrook Plan includes policies to expand the town to nearly 8,000 homes.
- 4.31. Cranbrook will continue to develop under the adopted Cranbrook Plan, with selected policies from this local plan also applicable. The Cranbrook Plan has an end date of 2031, and a new plan will supersede it before then.

## **Green infrastructure and a high-quality environment for the western side of East Devon**

- 2.7 Green Infrastructure (GI) is a network of multifunctional green spaces and natural areas, including footpaths, cycleways, and other routes that link these spaces. GI delivers a wide range of environmental, economic, health, and wellbeing benefits. Significant emphasis has been placed on GI provision and enhancement in the western side of East Devon, particularly through the Clyst Valley Regional Park, which this plan provides the expansion for.

### **Strategic Policy WS09: Clyst Valley Regional Park (Green and Blue Infrastructure)**

#### **Clyst Valley Regional Park**

Land is allocated, as shown on the Policies Map, for the Clyst Valley Regional Park (CVRP). Development proposals within and adjacent to the CVRP will integrate Green Infrastructure and support the achievement of the objectives in the CVRP

Management Plan. Any schemes that do not contribute to these objectives, or which would frustrate their implementation, will be refused planning permission.

All major development proposals within or on land adjacent to the Clyst Valley Regional Park will:

- Meet local plan policy requirements for Green and Blue Infrastructure
- Provide connected cycling/walking infrastructure, where possible, including extension of or links to the Clyst Valley Trail
- Restore and enhance the landscape character and sense of place of the Clyst Valley
- Reduce recreation pressure on environmentally sensitive locations, through the creation of accessible green space and where appropriate Suitable Alternative Natural Greenspace (SANG).
- Contribute to the achievement of excellent ecological status in the River Clyst and tributaries, through enhanced natural flood storage, capture of run-off and restoration of soil health.

Major development proposals within or adjoining the park should also contribute to or make proportionate contributions to the following CVRP targets:

- Creation and/or restoration of 1,000 hectares of priority natural habitat within the Nature Recovery Network
- 30% tree canopy cover in accordance with the East Devon Tree, Woodland and Hedges Strategy
- 740 hectares of Public Open Space meeting 'Building with Nature' or 'Green Flag Award' standards.
- 80 km of traffic-free trail and quiet way meeting LTN 1/20 design standards – see [Cycle infrastructure design \(LTN 1/20\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-1-20)

Where major development occurs outside of but close to the allocated park, we would wish to see all the above policy tests addressed any also green space provision associated with or required for the development should, where possible, be linked to and provide pedestrian and cycle access into the CVRP.

## Justification for policy

- 4.32. The Clyst Valley Regional Park is a strategic asset on the western side of East Devon, forming a setting for new developments. It was first defined alongside earlier strategic development schemes.
- 4.33. A 25-year masterplan for the Regional Park, approved by EDDC in February 2021, won the 2021 RTPI South West Award for Planning Excellence and was a finalist in the national RTPI awards 2022.
- 4.34. The park concept links greenspaces with predominantly traffic-free trails and good public transport. Most of the park is privately owned, with 762 hectares currently accessible and an ambition to increase this by 740 hectares over 25 years. A large portion of the park is within the National Trust's Killerton estate and 40% is within a floodplain.
- 4.35. The park ensures European protected wildlife sites meet conservation objectives. SANGS can mitigate public disturbance impacts on Natura 2000 sites and may be within or outside the park boundary if they meet SANGS criteria.
- 4.36. The Cyst Canopy project aims to increase tree cover from 10% to 30% over 50 years through retaining mature trees, natural regeneration, and planting various tree forms. Urban tree cover is also vital.
- 4.37. Delivering park objectives relies on partnerships across public, private, and charitable sectors, with funding from diverse sources, including Community Infrastructure Levy and Section 106 obligations. EDDC has secured funding from the National Lottery Heritage Fund with match funding from partners.

## Development north of Topsham and east of the M5 Motorway

- 4.38. Taking advantage of proximity to Exeter and links with Topsham, land is allocated for an urban extension north of Topsham.

### Strategic Policy WS10: Development next to the M5 and north of Topsham

Land shown on the Policies Map is allocated in East Devon for an urban extension to the north of Topsham to accommodate mixed use development including:

- around 596 new homes,
- 2.4 hectares of employment land,

- 1.8 of land for, and the delivery of, a new 220 place primary school, and
- Supporting infrastructure, green spaces and links to the Clyst Valley Regional Park.

The development will need to be supported by a new developer provided SANGs, bought forward and implemented as part of the overall scheme on the allocated or on nearby land.

This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented, including with appropriate mechanisms for apportionment of development costs and contributions across separately owned land parcels. Full agreement will be required before any specific parcels of land can come forward for development.

This Masterplan will also need to be developed in conjunction with joint work between Exeter City Council and East Devon District Council on a formal **Development and Infrastructure Delivery Framework** which is required to ensure development and infrastructure needs on the edge of Topsham, in the Exeter City Council area, and the adjacent allocation North of Topsham, in East Devon, progress in a coordinated cross-boundary manner.

The delivery framework will include:

- a. The timely delivery and funding of a range of infrastructure and facilities including primary education, primary healthcare, indoor space for community use, sport and recreation and green infrastructure to meet the needs from development in Exeter and East Devon;
- b. A comprehensive transport strategy to prioritise active travel and public transport; and
- c. The need to respect Exeter's landscape setting area and the Clyst Valley Regional Park.

The Delivery Framework will be produced jointly by East Devon District Council and the City Council working with partners including landowners, developers, Devon County Council, the Environment Agency, Natural England, the NHS, community groups and Clyst St George Parish Council.

Planning permission will not be granted for any individual parcel of land in the allocation in the absence of a comprehensive development scheme with clear mechanisms outlined for full policy requirements to be met and delivered.

- 4.39. Land near Exeter, south of Junction 30 of the M5, offers an opportunity for new mixed-use development, accommodating around 580 new homes. Development in East Devon should be planned in the context of city development, with a masterplan addressing development in East Devon and joint work on an Infrastructure Delivery Plan.

### **Gypsy and traveller site east of the M5 and south of the Exeter-Waterloo line**

- 4.40. Land east of the M5 and south of the Exeter-Waterloo line has been identified for a gypsy and traveller site due to an unmet need, particularly in the West End of East Devon.

### **Strategic Policy WS11: Gypsy and traveller site east of the M5 and south of the Exeter-Waterloo line**

Land shown on the Policies Map that lies to the east of the M5 and south of the Exeter-Waterloo line is allocated for a gypsy and traveller site to provide at least 5 permanent pitches.

Planning permission will be granted for development of a gypsy and/or traveller site to address need for provision specifically on the western side of East Devon District. The allocated site benefits from good highway access roads to the south though any proposal will need to be carefully designed to avoid adverse impacts on surrounding uses and the high quality of commercial and residential development in this part of East Devon.

An area of floodplain covers part of the site and as such built development will need to be within central and northerly parts of the site and further flood risk assessment will be required to demonstrate acceptability of proposals. Development for non gypsy and traveller uses and occupation, other than for supporting infrastructure, facilities and landscaping will be resisted.

## Justification for plan policy

- 4.41. The latest needs study highlights a shortage of gypsy and traveller accommodation in East Devon, with a particular need in the West End due to historic travelling patterns. The site offers good highway access and pedestrian access to services and facilities. It previously housed a piggery, and existing farm buildings may be converted for ancillary use.

## Other Employment Sites in the West End

### Employment Land at Sandygate, Between the M5 and Clyst Road

- 4.42. A small piece of land on the eastern side of Clyst Road is allocated for employment uses, suitable for small business or start-up units.

### Strategic Policy WS12: Employment land at Sandygate, between the M5 and Clyst Road (site Clge\_07)

An area of 0.7 hectares of land, as shown on the Policies Map, is allocated for small business units. The following uses will be considered appropriate;

- B2
- E(g)

This allocation will need to be accessed through the adjoining employment site unless it can be demonstrated that a safe access directly onto Clyst Road can be achieved. Development may also need to contribute towards localised mitigation of any traffic concerns on the highway network.

Archaeological assessment will be required prior to development commencing and building height and design considerations will be critical in order to ensure that development does not impact on the setting of Clyst St Mary Bridge, which is a Scheduled Monument.

## Justification for plan policy

- 4.43. This site is allocated for small business or start-up units to meet the need for smaller, less expensive premises not otherwise available in this area. Development proposals must consider environmental, heritage, and traffic assessments, with appropriate mitigation if required. Contributions may be sought for active travel plan improvements as outlined in the emerging Clyst

Road Access Strategy. The Impact Risk Zone for the Exe Estuary SPA may be triggered by air pollution or water discharge exceeding 20m<sup>3</sup>/day.

## **Employment Land at Lodge Trading Estate, Station Road, Broadclyst**

- 4.44. Land to the east of the existing employment area at Lodge Trading Estate, Broadclyst, is allocated for small or medium businesses, but not for those generating significant HGV movements due to local highway constraints.

### **Strategic Policy WS13: Employment land at Lodge Trading Estate, Station Road, Broadclyst (site Brcl\_27a)**

An area of 1.89 hectares of land, as shown on the Policies Map, is allocated for employment use. The following uses will be considered appropriate;

- B2
- E(g)

Due to the special characteristics of the site, further assessment work will be required to inform any planning application. This should include:

- Detailed flood risk assessment.
- Archaeological assessment
- Onsite verification of the extent of the Coastal and Floodplain grazing marsh priority habitat and a design and layout which avoids this area

The access arrangements will require assessment to ensure that Station Road is suitable to accommodate additional traffic and any non-motorised user requirements. The developer may be required to contribute towards localised mitigation on the highway network.

## **Justification for Plan Policy**

- 4.45. This site extends an existing business park, limited to areas outside the floodplain and not in active employment use. Development must consider environmental and heritage factors, and future highway improvements for non-motorised users. Proximity to the railway requires improvements to fencing and maintenance access. The Impact Risk Zone for the Exe Estuary SPA may be triggered by water discharge exceeding 20m<sup>3</sup>/day.



## **Employment Land South of Langdon's Business Park, Clyst St Mary**

- 4.46. Land to the south of Langdon's Business Park, Clyst St Mary, is allocated for employment uses, suitable for small or medium businesses, with a focus on supporting the expansion of existing businesses.

### **Strategic Policy WS14: Employment land south of Langdon's Business Park, Clyst St Mary (site Sowt\_15a)**

An area of 1 hectare of land, as shown on the Policies Map, is allocated for new business units. The following uses will be considered appropriate;

- B2
- B8
- E(g)

Archaeological assessment will be required prior to development commencing. Due to the proximity of a number of Grade II listed buildings a high quality sensitively planned development scheme will be required at this site with particular attention given to of building heights, design, materials and landscaping along with associated mitigation measures.

The current access arrangements will require reassessment to ensure they are suitable to accommodate additional traffic. The developer may be required to contribute towards localised mitigation on the highway network.

## **Justification for Plan Policy**

- 4.47. This site is allocated for business units, particularly to support the expansion of existing businesses on the Business Park. Development must consider environmental, heritage, and traffic factors, with detailed assessments and appropriate mitigation as required. The Impact Risk Zone for the Exe Estuary SPA may be triggered by industrial development causing air pollution or water discharge exceeding 5m<sup>3</sup>/day

## **Employment land at Darts Farm, Topsham Road, Clyst St George**

- 4.75 Darts Farm, a popular shopping centre, has a small parcel of land allocated for employment use. This site offers an opportunity to produce and showcase locally grown food and drink.

## **Strategic Policy WS15: Employment land at Darts Farm (site Clge\_23a and Clge\_25a)**

An area of 2.13 hectares of land, as shown on the Policies Map, is allocated for small business units in Use Class E(g) for the manufacture or processing of locally grown food and drink products.

Road access for this allocation will need to be through the main Darts Farm access and development proposals will be required to demonstrate that this can be achieved safely and without detriment to the existing commercial activities and car parking provision on the wider site. The developer may be required to contribute towards localised mitigation on the highway network.

Archaeological assessment will be required prior to development commencing.

A site-specific FRA will be required to assess the risk of surface water and groundwater flooding in relation to the proposed development, and development should be placed outside of the areas at risk from surface water flooding.

Infiltration rates will need to be assessed on site as part of a drainage strategy. Noting that the site is located within a Nitrate Vulnerable Zone, Impact Risk Zone for the Exe Estuary SPA may be triggered if there is any discharge of water or liquid waste that is discharged to ground or to surface water. If the development will affect trees or hedges along the north of the site, then further assessment of impact on the Exe Estuary SPA will be required.

### **Justification for plan policy**

- 4.48. This site is allocated for small business units to complement the adjoining retail use, add value to locally produced goods, and meet an identified need in the District. Preference is given to the manufacture and processing of local food and drink products.
- 4.49. Development proposals must be based on further environmental, heritage, and traffic assessments, with appropriate mitigation undertaken if required.

# Chapter 5. Development in the Towns and Villages

- 5.1. This chapter outlines land allocations for development in Exmouth, Main Centres, Local Centres, and Service Villages in East Devon, based on the settlement hierarchy set out in the plan.
- 5.2. Policies specify expected development levels on each site, expressed as approximate numbers. Higher or lower levels may be possible depending on site-specific constraints or opportunities. Policies address challenges, concerns, or opportunities for high-quality development on specific sites but the plan should be read as a whole to apply all relevant policies.

## The principal centre of Exmouth

- 5.3. Exmouth is established as the only Tier 1 settlement, suitable for higher levels of growth and development. The plan allocates land for housing and employment in Exmouth, proportionate to its size, function, and future role, as shown on the policies map.

### Strategic Policy SD01: Exmouth and its future development

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

#### Land to the South of Courtlands Lane (Exmo\_23)

This land, south of Courtlands Lane, will form a small-scale development on the northern side of Exmouth to accommodate around 12 new homes. The scheme will need to demonstrate how safe pedestrian access, avoiding on-road walking, will be achieved to surrounding and neighbouring areas.

#### Land at Courtlands Cross (Lymp\_07)

This site at Courtlands Cross will accommodate around 100 new homes and 0.4 hectares of employment land. The field to the west of the housing allocated land is allocated for delivery of sports pitch uses and associated low key ancillary facilities as part of a viable package of planning obligations. Built development at this site, located on the two south-easterly fields, will need to be particularly sensitively designed to avoid potential for adverse impact on nearby heritage

assets and to avoid adverse landscape impacts. Particular importance is attached to retention of the East Devon Way footpath, in a spacious corridor, across the site in a north-south direction. There should also be safe off-street pedestrian and cycle access that provides for east-west movement through the area for existing and future users linking into adjacent areas such as Lympstone Manor and allocated site Exmo\_23.

#### **Land west of Hulham Road (Exmo\_47)**

This land west of Hulham Road, south of Point-in-view, is allocated for around 15 new homes. The sensitive historic setting of this site, with a Registered Park or Garden to the northern and western site boundaries is such that any scheme will need to be sensitively designed to avoid adverse impacts. Built development should be accommodated in the southerly parts of the site only.

#### **Land at Coles Field Hulham Road (Lymp\_14)**

This site is allocated for around 59 new homes. Biodiversity interest at and close to this site will demand particular sensitivity in respect of site design and implementation to avoid damages. This site will need to provide pedestrian and cycle access into the adjoining site Exmo\_04a.

#### **Land at Marley Drive (Exmo\_04a)**

This site is allocated for around 50 new homes. The site supports a number of significant mature trees with areas of biodiversity value within the site and to its boundaries which will demand particular sensitivity in respect of site design and implementation to avoid damages. There will need to be pedestrian and cycle access through this site into Site Lymp\_14 and thereafter on into Goodmores Farm.

#### **Land at St John's (Exmo\_20)**

Land at St John's, on the eastern side of Exmouth, is allocated for a comprehensive development scheme to accommodate:

- social and community facilities along with
- around 700 new homes and
- at least 2 hectares of employment land.

This site allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how phased comprehensive development will be undertaken and implemented, including with appropriate mechanisms for apportionment of development costs and contributions across separately owned land parcels. Full agreement will be required before any specific parcels of land can come forward for development.

Built development will need to be concentrated in the southern parts of the site and the scheme will need to place considerable emphasis on protection of the setting and tranquillity of nearby heritage assets, specifically St John in the Wilderness church. Support will be given for expansion of the churchyard, to provide more burial/interment of ashes space at St John in the Wilderness. Parts of the site and adjoining areas, especially woodlands are of biodiversity importance and sensitivity and great care will be needed in developing proposals to ensure their protection and enhancement. The development will need to be supported by a new developer provided SANGs, brought forward and implemented as part of the overall scheme on the allocated or on nearby land.

Vehicular access to southern site parts will be from Southern Wood with northern parts from the B3179. High quality, safe and attractive to use pedestrian, cycle and public transport access will need to be an essential part of the overall development scheme.

#### **Land directly to the East of Liverton Business Park (Exmo\_18)**

This land east of Liverton Business Park is allocated for employment uses and will form an extension to the existing business park and extends to around 2.7 hectares in size.

#### **Land to the South of Littleham (Exmo\_17)**

This land on the north eastern side of Exmouth is allocated for a mixed-use development to provide:

- Around 410 new homes;
- 1.6 hectares of employment; and
- supporting community uses.

This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. The site is located in the East Devon National Landscape and particular sensitivity will need to be taken in respect of design and

development approaches to minimise potential for adverse landscape impacts. Southerly parts of the site are particularly sensitive and considerable care will be needed in protecting the setting and ambience of St Margaret and St Andrews Church at Littleham.

The development will need to be supported by a new developer provided SANGs, bought forward and implemented as part of the overall scheme on the allocated or on nearby land. The cycle path bisecting the site will need to be retained within an attractive corridor with pedestrian and cycle access routes provided throughout the development.

#### **Littleham Fields (Exmo\_08 and Exmo\_16 combined)**

This land close to Littleham will form a small-scale residential extension on the southern side of Exmouth to accommodate around 45 new homes. Parts of the site are steeply sloping and great care will be needed in design and through landscaping to minimise landscape impacts. There is also the listed Green Farm to the west of the site the setting of which will need to be carefully address.

#### **Land at Douglas Gardens (Exmo\_06)**

This land at Douglas Gardens will form a small-scale residential extension on the southern side of Exmouth to accommodate around 44 new homes.

#### **Exmouth town centre Police Station (Exmo\_50)**

This site forms an urban redevelopment opportunity that will accommodate a new police station as well as at least 20 new homes, though with skilful design, noting the significance heritage interests around the site, a greater number of new homes will be actively encouraged. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan.

## **Axminster**

- 5.4. The Local Plan strategy establishes Axminster as a Tier 2, Main Centre, settlement and as such as an appropriate location for future growth and development.

## **Strategic Policy SD02: Axminster and its future development**

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

### **Land east of Lyme Road (Axmi\_22)**

This site is allocated for 100 dwellings. The site layout should make provision for a suitable access road to facilitate the development of site GH/ED/80 to the north and also be built to a standard suitable for use as part of a possible future relief road to link to the A358, Chard Road, south of the Weycroft Bridge.

### **Prestaller Farm, Beavor Lane (Part of GH/ED/80)**

This site is allocated for 225 dwellings and a community hub to the south of the Mill Brook. The community space should provide opportunities for a workspace, café/shop and meeting space. To the north of Mill Brook land has the potential for use as a multi-functional public open and natural space as well as for habitat mitigation purposes. Where this is required to meet the needs of the development provision will be required. Vehicular access to the site shall be from the allocated land to the south (Axmi\_22) unless otherwise agreed.

Development must incorporate a site road that is of a standard and is appropriately located so that it, and through potential future extension of the road, can form a possible future relief road to link to the A358, Chard Road, south of the Weycroft Bridge. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan.

### **Land west of Chard Road (GH/ED/83)**

This land is allocated for 140 dwellings and 0.8 hectares of employment land.

### **Land west of Musbury Road (Axmi\_01a)**

This land is allocated for 2 hectares of employment land. The site contains two World War II pill boxes and development between them and the railway line to the west should be kept as public open space with interpretation boards to explain the significance of their role in the Taunton Stop Line. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan.



### **Land east of Musbury Road (Axmi\_02, Axmi\_08 and Axmi\_09)**

This land is proposed for 438 dwellings and 1.6 hectares of employment land. This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. Through this masterplan particular account will need to be taken of providing active travel links to the town centre and railway station, together with addressing the landscape and heritage sensitivities of the site. Highways access shall be taken from the A358 Musbury Road. The masterplan shall take full account of archaeological survey work to determine the extent of remains associated with the adjacent Scheduled Ancient Monument. Community facilities to include a hall or meeting place will need to be incorporated into and delivered by the development.

### **Land at Axminster Carpets (Axmi\_07)**

This land is allocated for mixed-use redevelopment to retain the existing employment use and accommodate 50 dwellings plus additional employment uses. This allocation will need to be supported by further flood risk assessment and a comprehensive masterplan to secure pedestrian, environmental and other improvements. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential and exception test has been undertaken as part of the local plan.

### **Scott Rowe Building, Axminster Hospital, Chard Road (Axmi\_10)**

This brownfield land redevelopment opportunity land is allocated for 10 dwellings.

### **Land at Lea Combe, Field End (Axmi\_12)**

This land is allocated for 9 dwellings. The site will need to be carefully designed to accommodate and protect the trees, which are subject to a Tree Preservation Order, and also to protect the setting of nearby heritage assets.

### **Land east of Lyme Close (Part of Axmi\_11c )**

This land is allocated for 50 dwellings and 0.4 hectares of employment land.

### **Chard Road, Axminster (Axmi\_17 Land at Millwey)**

This land is allocated for 19 dwellings. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local

plan. This site is an existing open space, with a previous use for sports pitches, the loss of which will need to be addressed through the development process.

#### **Millwey Garages, St Andrews Drive (Axmi\_18)**

This Brownfield land is allocated for 6 dwellings

#### **Websters Garage, 9 Lyme Street (Axmi\_23)**

This land is allocated for 10 dwellings as part of a mixed-use development. Though with well-designed development there is potential scope to accommodate more new homes potentially as well as commercial space or community facilities. Very careful design will be needed to reflect the Conservation Area location and the setting of surrounding heritage assets. Support will be given for incorporation of unused or underused land and buildings adjoining the allocated site to be incorporated into a comprehensive scheme.

#### **Land west of Prestaller Farm, Beavor Lane (Axmi\_24)**

This land is allocated for 29 dwellings.

### **Honiton**

- 5.5. The Local Plan strategy establishes Honiton as a Tier 2 settlement and as such as an appropriate location for future growth and development. Plan policy sets out land allocations for development and these are shown on the policies map along with other policy boundaries that are at the town.

#### **Strategic Policy SD03 – Honiton and its future development**

The sites/areas listed below are identified on the Policies Map and are allocated for development.

#### **Land west of Hayne Lane (Gitti\_03, Gitti\_04 and Gitti\_05)**

Land to the west of Hayne Lane, on the western side of Honiton, is allocated for a mixed-use development to provide:

- 310 homes and
- 14.6 hectares of land to accommodate employment and community uses.

This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. Southern parts of the site are in the East Devon National Landscape and this area will require very careful design to take account of its landscape setting. On the western edges the site is close to the historic village of Gittisham and particular sensitivity will need to be attached to preventing adverse heritage impacts. These southerly and westerly parts will be best suited for open space uses.

Commercial and employment uses will need to be concentrated to the north of the railway line bisecting the site with residential uses to the south. Community facilities, to include a shop or shops and a hall, will need to be provided within or next to residential parts of the development. There will be the need for attractive and safe pedestrian and cycle linkages between the southern and northern parts of the site (ideally utilising an existing passage under the railway that lies in a roughly mid-way point in the allocation).

#### **Former Millwater School at Bottom Road (Honi\_06)**

This land is allocated for 30 homes and will form a small-scale development in the southern part of Honiton.

#### **Land adjacent to St Michaels Church and south east of Cuckoo Down Lane (Honi\_07 and Honi\_12)**

This land is allocated for 101 homes and will form a residential extension on the southern side of Honiton. The site is in the Blackdown Hills National Landscape area and close to heritage assets, it will require very careful design to take account of its landscape setting and the setting of surrounding heritage assets. Therefore a high-quality comprehensive development scheme is required for the whole site.

#### **Land at Ottery Moor Lane (Honi\_10)**

This land is allocated for 21 homes and will form a small-scale development on the northern side of Honiton.

#### **Land at Middle Hill, Church Hill (Honi\_13)**

This land is allocated for 10 homes and will form a small-scale residential extension on the southern side of Honiton. This site is in the Blackdown Hills National

Landscape and close to heritage assets, it requires very careful design to take account of its landscape setting and the setting of surrounding heritage assets.

#### **Land at Hurlakes, Northcote Hill (Honi\_14)**

This land is allocated for 30 homes and will form a small-scale residential extension on the eastern side of Honiton.

#### **Land at Kings Road (Honi\_18)**

This land is allocated for 136 homes and will form a medium-scale residential extension on the eastern side of Honiton.

#### **Land south of Northcote Hill – north of the railway (GH/ED/39a)**

This site is allocated for a total of 100 homes and will form a medium-scale residential extension on the eastern side of Honiton.

#### **Land south of Northcote Hill – south of the railway (GH/ED/39b)**

This site is allocated for a total of 100 homes and will form a medium-scale residential extension on the eastern side of Honiton. Parts of the site are on more elevated ground and development will need to be sensitively planned to avoid adverse impacts on the nearby Blackdown Hills National Landscape area.

#### **Employment Land within the Existing Heathpark Industrial Estate**

Within the existing Heathpark industrial estate Plots 11A, 11B, 11D and 11M extending to 3.3 hectares are allocated for employment development.

### **Ottery St Mary**

- 5.6. The Local Plan strategy establishes Ottery St Mary as a Tier 2 settlement and as such as an appropriate location for future growth and development. Plan policy sets out land allocations for development and these are shown on the policies map along with other policy boundaries that are at the town.

## **Strategic Policy SD04 – Ottery St Mary and its future development**

The sites/areas listed below as identified on the Policies Map are allocated for development.

### **Barrack Farm (Otry\_01b)**

This land at Barrack Farm, on the western side of Ottery St Mary, is allocated for around 70 new homes and 1.25 hectare of employment land provision. Archaeological assessment will be required prior to development commencing and will need to inform development proposals.

### **Land at Thorne Farm (Otry\_09)**

This land, which lies west of the town and adjacent to the sports centre and school, will provide 90 new homes as well as space for an educational facility. Further flood risk assessment is required and an undeveloped buffer should be maintained to protect the County Wildlife Site and Ancient Woodland to the north west of the site.

### **Land at Salston Barton (Otry\_10)**

This land, which lies north and south of Salston Barton, is proposed for 20 houses. Archaeological assessment will be required prior to development commencing. This allocation must be supported by details of special measures to be taken to protect ancient trees and measures to ensure that safe cycle and pedestrian access to nearby facilities and Ottery St Mary town centre can be achieved.

Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan.

### **Land at Bylands, Slade Road (Otry\_15)**

This garden site on the eastern side of the town at Slade Road is proposed for 8 houses.

### **Land south of Strawberry Lane (GH/ED/27)**

This land lies south of Strawberry Lane and is proposed for 60 houses. This allocation will need to be supported by further flood risk assessment work, details of special measures to be taken to protect ancient trees and measures to ensure that safe cycle and pedestrian access to nearby facilities and Ottery St Mary town

centre can be achieved. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan.

#### **Gerway Farm (Otry\_21)**

This land at Gerway Farm, off Sidmouth Road, is proposed for 70 houses. Archaeological assessment is required prior to development. Further flood risk assessment and measures to ensure that safe cycle and pedestrian access to nearby facilities can be achieved will be required.

### **Seaton**

- 3.1 The Local Plan strategy establishes Seaton as a 'Main Centre' (Tier 2 settlement) and as such as an appropriate location for significant development to serve its own needs and that of wider surrounding areas. Plan policy sets out land allocations for development and these are shown on the policies map along with other policy boundaries that are at the town.

#### **Strategic Policy SD05: Seaton and its future development**

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

##### **Land at Barnards Hill Lane (Seat\_02)**

This site is allocated for around 40 dwellings. A wide buffer should be provided to the northern boundary with tree planting/landscaping in the northern and western edges to soften the boundary with the countryside and create a well considered and designed northern edge to Seaton. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented.

##### **Land to the south of Harepath Hill (Seat\_03)**

This site is allocated for around 75 dwellings. Built development should be concentrated in the less prominent eastern edge near Harepath Road, and/or to the south adjoining existing dwellings up to 55m contour line. Development should also respect the setting of the Grade II listed Harepath Farm. A wide buffer should be provided to the northern and western boundaries with tree planting/landscaping in the northern and western edges to soften the boundary edge with the countryside and create a well considered and designed northern

edge to Seaton. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented.

#### **Land off Harepath Road (Seat\_05)**

This site is allocated for around 130 dwellings and 2.2 hectares of employment land. The employment land should be located in the field immediately north of the existing Harepath Road Industrial Estate. The small areas of adjoining woodland to the north should be enhanced through additional planting. Tree planting/landscaping on the northern edge is required and will help soften boundary edges with the countryside. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented.

**Seat\_03 and Seat\_05** will need to come forward as a co-ordinated and comprehensive development that delivers the proposed large-scale mixed-use development on the northern edge of Seaton and seeks to deliver the long-standing need for a football pitch as part of a viable package of planning obligations.

#### **Land west of Axeview Road (Seat\_13a)**

This site is allocated for around 39 dwellings. Archaeological assessment through geophysical survey and field evaluation should be undertaken prior to the site being developed. Development must be sensitively located and designed to ensure that it avoids damage to archaeological remains and conserves the setting of Roman and Earlier Settlement remains at Honeyditches Scheduled Monument.

## **Sidmouth**

- 3.2 The Local Plan strategy establishes Sidmouth as a Tier 2 settlement and as such as an appropriate location for future growth and development. Plan policy sets out land allocations for development and these are shown on the policies map along with other policy boundaries that are at the town.



## **Strategic Policy SD06: Sidmouth and its future development**

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

### **Land south-west of Woolbrook Road (Sidm\_01)**

This land is allocated for development of 127 new homes. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented.

### **Land west of Two Bridges Road, Sidford (Sidm\_06)**

This land is allocated for development to the north of Sidford to accommodate around 30 new homes. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented.

### **Land east of Burscombe Lane / west of Windsor Mead (Sidm\_31)**

This land is allocated for a small-scale development adjacent to the built edge to the north of Sidford and will accommodate around 15 new homes. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented.

## **Local Centres**

3.3 There are five local centres (Tier 3 settlements) that are explicitly identified as offering scope for development in the local plan, these are:

- Broadclyst;
- Budleigh Salterton;
- Colyton;
- Lympstone; and
- Woodbury.

- 3.4 Plan policy sets out land allocations for development at the local centres and these are shown on the policies map along with other policy boundaries that are at the local centres.

## **Broadclyst**

### **Strategic Policy SD07: Development at Broadclyst**

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

#### **Land west of Whimble Road, Broadclyst (Brcl\_12) combined with Land to east of Town End, Broadclyst (Brcl\_29)**

Development of these two sites, on the eastern side of the village, will need to come forward to an agreed Masterplan that provides for a comprehensive development scheme for both land areas. Vehicle access to the combined sites will need to be from Whimble Road with vehicle and pedestrian access from Brcl\_12 linking through and into Brcl\_29.

**Area Brcl\_12** - is to accommodate around 100 new homes and 0.6 hectares of employment land. Built form shall be focused on the land to the north west of Winter Gardens and south of Lake Farm with lower density development forming a frontage onto the road from Burrows Cross within the field to the north west of Winter Gardens. To the north of Brcl\_12 there is scope to provide open space and habitat and other open space areas.

**Area Brcl\_29** – is to accommodate around 24 new homes. Vehicle and pedestrian access routes will need to be provided to link into allocated land at Brcl\_12. And there will need to be pedestrian access to Green Tree Lane and /or Town End.



## **Budleigh Salterton**

### **Strategic Policy SD08: Development at Budleigh Salterton**

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

### **Land at Barn Lane, Knowle, Budleigh Salterton (Budl\_02)**

This land on the northern side of Budleigh Salterton is allocated for 35 new dwellings. The site is located inside the East Devon National Landscape area and particular sensitivity will need to be attached to development proposals in respect of potential adverse landscape impacts. Site development will need to come forward with provision of safe footpath access to the Budleigh primary school. Site proximity to the Grade II\* listed Tidwell House is such that significant care must be taken to avoid potential for adverse impacts on the property and its setting.

**Budl\_01 – Land south of Bedlands Lane and west of Dark Lane (Budl\_01)** Note that allocation of this land is subject to further assessment and is to only be allocated in the Publication plan subject to acceptability of a reasonable scheme/allocation boundary.

This land, south of Bedlands Lane and west of Dark Lane, is allocated for 50 dwellings

## **Colyton**

### **Strategic Policy SD09: Development at Colyton**

The sites/areas listed below are identified on the Policies Map and are allocated for development.

#### **Land at Hillhead (Coly\_02)**

This site, to the west of Colyton, is allocated for 49 new homes. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented.

#### **Land adjacent to the Peace Memorial Playing Fields (Coly\_06)**

This site, adjacent to the Peace Memorial playing fields, is allocated for 12 new homes. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should inform the proposals for development of this site. However, more detailed flood assessment work and appropriate

mitigation may be required as part of any proposal and should be assessed as part of a strategy informing proposals. Flood zone 3 land at the site may offer some scope for open space uses but should not form part of gardens, car parking or other features associated with individual plots

In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented.

## **Lympstone**

### **Strategic Policy SD10: Development at Lympstone**

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

#### **Lymp\_01 - Little Paddocks, 22 Underhill Crescent, Lympstone**

This site is allocated for 8 new homes. Additional tree planting should be provided along the southern boundary to mitigate the visual impact of the settlement edge upon the countryside beyond.

#### **GH/ED/72a - Land at Meeting Lane, Lympstone**

This site is allocated for 42 new homes. Tree planting along the western and northern edge should be provided to mitigate the impact upon Nutwell Park. A pedestrian link should connect with the existing footpath on Meeting Lane to the south.

#### **GH/ED/73 - Land north west of Strawberry Hill, Lympstone**

This site is allocated for 46 new homes. Built development should not occur in the triangular area in the centre of site that is a "lost" orchard and ridge and furrow. This area should be reinstated as an orchard or otherwise provided as open publicly accessible open space. A pedestrian link should connect with the existing footpath on Meeting Lane to the north west.

## Woodbury

### Strategic Policy SD11: Development at Woodbury

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

#### Land to rear of Orchard House, Globe Hill, Woodbury (Wood\_06)

This site is allocated for around 30 dwellings. The design and layout of development should reflect the key characteristics of Woodbury Conservation Area, adjoining to the east. Tree planting along the western boundary should be provided to soften the boundary edge with the countryside.

#### Land Off Globe Hill, Woodbury (Wood\_09)

This site is allocated for around 28 dwellings. Development should include public open space and Green Infrastructure links (including the areas of flood zone 3) through the site to provide opportunities for the public to appreciate a key local landmark (Grade I listed Parish Church of St Swithun) and Woodbury Conservation Area. The design and layout of development should reflect the key characteristics of Woodbury Conservation Area, minimising the loss of existing mature hedgerow and trees.

#### Land at Gilbrook (Wood\_10)

This site is allocated for around 60 dwellings. Development should incorporate pedestrian/cycle links into Gilbrook House and/or Beeches Close to the north, to offer direct access to the settlement centre. Development should incorporate tree planting that reflects the historic "lost" orchard that covered much of the site, with Green infrastructure opportunities along the flood plain in the eastern part of site. The design and layout of development should reflect the key characteristics of Woodbury Conservation Area to the north.

#### Land south of Broadway (Wood\_16)

This site is allocated for around 70 dwellings. Suitable provision will need to be made for [pedestrians to safely cross the B3179 to access the pavement route to the village centre. Woodbury footpath 3, as it travels through the site, must be protected and enhanced.

### **Land east of Town Lane (Wood\_20)**

This site is allocated for around 28 dwellings. Development should ensure safe and suitable pedestrian access along Town Lane. Development should provide tree planting to extend the existing woodland to north, with a reduced building height or avoid built development in the eastern edge to minimise the impact on the surrounding countryside.

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## Service Villages

5.12. There are 23 'service villages' that are identified as offering specific scope for development in the local plan, these are:

- |                   |                        |
|-------------------|------------------------|
| 1. Beer,          | 13. Newton Poppleford, |
| 2. Branscombe,    | 14. Otterton,          |
| 3. Broadhembury,  | 15. Payhembury,        |
| 4. Chardstock,    | 16. Plymtree,          |
| 5. Clyst St Mary, | 17. Sidbury,           |
| 6. Dunkeswell,    | 18. Stoke Canon,       |
| 7. East Budleigh, | 19. Tipton St John,    |
| 8. Exton,         | 20. Uplyme,            |
| 9. Feniton,       | 21. Westclyst,         |
| 10. Hawkchurch,   | 22. West Hill,         |
| 11. Kilminster,   | 23. Whimple.           |
| 12. Musbury,      |                        |

3.6 All of the above villages have some local facilities that serve some of the needs of resident populations.

3.7 The above villages, except for Stoke Canon, have a Settlement Boundary around them, establishing in principle suitability for some development, essentially this can be expected to be around accommodating local need, and at some of them land is allocated for development through plan policies listed below.



## **Broadhembury**

### **Strategic Policy SD12: Development at Broadhembury**

The site/area listed below, as identified on the Policies Map, is allocated for development.

#### **Land opposite the Village Hall (Brhe\_09)**

The site is allocated for 10 homes. This site is particularly sensitive in heritage and landscape terms and careful detailed assessment and design work will be needed to ensure that the design respects the special character of the area. The site should be landscaped to provide boundary screening appropriate to the edge of National Landscape location.

Any application to develop the site must include a study of the impact of development on the setting of the Church, which is a Grade I listed building, and the Conservation Area. Proposals must show how adverse impacts will be avoided and where appropriate impact on these heritage assets will be mitigated.

## **Chardstock**

### **Strategic Policy SD13: Development at Chardstock**

The site/area listed below, as identified on the Policies Map, is allocated for development.

#### **Char\_04a - Land off Green Lane, Chardstock**

This site is allocated for around 30 dwellings.

Site proposals must include landscaping to include provision of appropriate boundary screening in respect of long-distance views to and from the Blackdown Hills National Landscape area.

Opportunities to provide a connection for residents to Public Right of Way Chardstock Footpath 30 are encouraged.

## Clyst St Mary

### Strategic Policy SD14: Development at Clyst St Mary

Development of at least 72 dwellings will be accommodated at Clyst St Mary through allocations to be made through the Neighbourhood Plan.

Development at the village will need to come forward on sites that meet broader local plan policy requirements and that are well related, physically close to or abutting, the built form of the village.

SP03  
Should development at Clyst St Mary have not started and progressed in a timely manner before 2030 the Council will review the need for allocations to be made in a future local plan (or similar plan document). After 2030, should housing development have not started, planning permission may be granted for windfall developments, outside of the settlement boundary for the village, to address part or all of the 72 dwelling shortfall where in compliance with wider local plan policies.

## Dunkeswell

### Strategic Policy SD15: Development at Dunkeswell

The site/area listed below as identified on the Policies Map is allocated for development.

#### **Broomfields, Dunkeswell (Dunk\_05)**

This site is proposed for 43 new homes.

A safe pedestrian footpath will need to be provided to enable access to local facilities. Ancient trees adjoining the site must be given specific protection through the development proposals.

## East Budleigh

### Strategic Policy SD16: Development at East Budleigh

The site/area listed below as identified on the Policies Map is allocated for development.

#### Land off Frogmore Road (Ebud\_01)

This site in East Budleigh site is allocated for 22 new homes. A high-quality development scheme is required for this prominent site noting its location in the East Devon National Landscape area and proximity of the Syon House as a non-designated heritage asset. Crossing provision over the B3178 should be provided for pedestrians and overhead wires across the site should be relocated underground.

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## Exton

### Strategic Policy SD17: Development at Exton

The sites/areas listed below as identified on the Policies Map are allocated for development.

#### Land west of Oaklands (Wood\_01)

The site is allocated for around 14 dwellings. Suitable provision must be made for pedestrians to safely cross from the site across the A376 to enable easy access to facilities in the settlement, along with pedestrian/cycle links to Wood\_28 adjacent to the south east.

#### Land north and east of Exton Farm (Wood\_28)

The site is allocated for around 39 dwellings. Development will need to provide safe and suitable pedestrian and cycle access along Mill Lane south to the existing pedestrian crossing at the A376/Station Road junction, to enable easy access to facilities in the settlement. This pedestrian crossing should be upgraded to accommodate cyclists, to enable access the Exe Estuary Trail via Station Road. Development should provide pedestrian/cycle links to Wood\_01 adjacent to north west. Development should include tree planting on the southern field to reflect their historic presence; and retain the hedgerow that disects the site, as far as practically possible. Development should address the existing flooding issues along Mill Lane.

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## Feniton

### Strategic Policy SD18: Development at Feniton

The sites/areas listed below, as shown on the Policies Map, are allocated for development at Feniton.

#### **Feni\_05 - Land at Burlands Mead**

Land and buildings at Burland Mead is allocated for around 42 dwellings.

#### **Feni\_08 - Land adjacent to Beechwood**

Land adjacent to Beechwoods is allocated for around 60 dwellings. Careful designed and implemented boundary treatment on the eastern side of the site will be required to form a soft edge to the countryside beyond.

#### **Otry\_20 - Land to the south east of Bridge Cottages**

Land to the south east of Bridge Cottages is allocated for employment use. The site extends in total to around 4.64 hectares but phased development will be required. A first northerly phase of land, extending to around 2 hectares, will need to be fully built-out before development will be allowed on a southerly phase.

## Hawkchurch

### Strategic Policy SD19: Development at Hawkchurch

The site/area listed below as identified on the Policies Map is allocated for development.

#### **Norton Store, Hawkchurch (Hawk\_01)**

This site is allocated for 12 new homes and 0.25 hectare of employment land.

This land is allocated for mixed-use redevelopment to retain the existing employment space and accommodate 12 dwellings plus a permanent location for the village shop and associated car and cycle parking and turning areas. The site should be landscaped to provide boundary screening appropriate to the location.

## Kilminster

### Strategic Policy SD20: Development at Kilminster

The sites listed below, as shown on the policies map, are allocated for development:

#### Land east of George Lane (Kilm\_09b)

Land east of George Lane is allocated for 23 homes. This site is in the East Devon National Landscape and requires very careful design to take account of its landscape setting. It is adjacent to Kilm\_09a, which the made Kilminster Neighbourhood Plan, has allocated for 14 dwellings. A comprehensive development layout should cover both the Neighbourhood Plan allocated site (09a) and the local plan site (09b), with overall site proposal conforming with the design principles set out in Neighbourhood Plan policy. For Kilm\_9b there must be buffer planting to the northern site boundary (along the A35) and footpath links to adjoining roads and paths, including to southern and northern site boundaries.

#### Land to the west and south west of the Old Inn (Kilm\_10)

Land to the west and south west of the Old Inn is allocated for 5 homes. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be addressed through development proposals. This site is in the East Devon National Landscape and requires very careful design to take account of its landscape setting. A sensitively designed scheme will also be essential to avoid potential for adverse impacts on the listed adjoining public house. The preference is for highway access to this site to be gained from site Kilm\_09b to the west.

## Musbury

### Strategic Policy SD21: Development at Musbury

The sites/areas listed below are identified on the Policies Map and are identified for development.

### **Land at Baxter's Farm (Musb\_01a)**

The site is allocated for 15 new homes with 0.06 hectares of employment uses. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be incorporated into the development. A sequential test has been undertaken as part of the local plan.

A high quality scheme is required at this site which is likely to require some conversions and some new build. The Council has prepared a Development Brief for this site (though there is no longer an expectation of the site providing Gypsy and Traveller pitches).

## **Newton Poppleford**

### **Strategic Policy SD22: Development at Newton Poppleford**

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

#### **Land to the West of Badger Close (Newt\_04)**

The site is allocated for 28 dwellings. This site is in the East Devon National Landscape and requires very careful design to take account of its landscape setting. There will need to be a footpath link provided from this site to site Newt\_05 and thereafter past the property 'Permarita' and then on to the King Alfred Way development. This and any existing paths linking to King Alfred Way must, as part of any development (if not already carried out), be made good and surfaced for use in all weather conditions. No houses shall be occupied until the full footpath link is provided and made available for use.

#### **Land to the east of Exmouth Road (Newt\_05)**

The site is allocated for 27 dwellings. This site is in the East Devon National Landscape and requires very careful design to take account of its landscape setting. Elevated parts of the eastern side of the site are especially sensitive and will require very careful planning at the design stage. No house shall be occupied until a footpath is provided and made available for use to the north of the site past the property 'Pemarita' and then on to King Alfred Way. This and any existing paths linking to King Alfred Way must, as part of any development (if not already carried out), be made good and surfaced for use in all weather conditions. No houses shall be occupied until the full footpath is provided and made available for use.



## Otterton

### Strategic Policy SD23: Development at Otterton

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

#### Land north of Behind Hayes (Otto\_01)

The site is allocated for 10 homes. There are significant heritage and landscape constraints at this site and the northwestern part of the site are not appropriate for built development. This land should be kept open and made available as a community open space/orchard or similar use. Development should be very carefully designed to ensure that it is compatible with the National Landscape and adequately mitigates any impact on the surrounding heritage assets.

#### Land adjacent to the North Star (Otto\_02)

This site is allocated for 8 new homes. A significant portion of this site is at risk of flooding and a level 2 Strategic Flood Risk Assessment and sequential test will need to be undertaken, by an applicant, to establish and confirm the acceptability of built development at this site and the details of any specific development scheme.

Draft

## **Payhembury**

### **Strategic Policy SD24: Development at Payhembury**

The site/area listed below, as identified on the Policies Map, is allocated for development.

#### **Land adjacent to Markers Park (Payh\_03a)**

This site is allocated for 15 homes.

Design and layout of proposals should be appropriate to this village gateway location and sensitively and appropriately take account of the heritage and any ecological significance of the marl pit (a non-designated heritage asset) which must be retained in the end proposals. Access should be designed to retain existing mature trees and minimise hedgerow removal, whilst ensuring highway safety. No house shall be occupied until a footpath connection is provided with existing pedestrian routes to the centre of the village. Landscaping which responds appropriately to the introduction of built form in this location shall be provided, including the introduction of substantial boundary screening along the southern boundary to maintain the rural character of the lane and the significance of the setting of the Grade II listed Glebe Farm on the southern approach.

Draft

## **Plymtree**

### **Strategic Policy SD25: Development at Plymtree**

The site/area listed below, as identified on the Policies Map, is allocated for development.

#### **Land north of the School (Plym\_03)**

Land is allocated for 30 new homes and a community facility.

This site is particularly sensitive in heritage terms and detailed assessment will be needed to ensure that an acceptable design solution is reached that respects the special character of the area and the setting of the heritage assets around the site. Footpath links to local facilities will be required as part of the development.

## **Sidbury**

### **Strategic Policy SD26: Development at Sidbury**

The site/area listed below, as identified on the Policies Map, is allocated for development.

#### **Land south of Furzehill (Sidm\_34)**

This site, to the south of Sidbury, is allocated for 43 new homes. Development of this site will enable the second phase of the Devon County Council proposed multi-use path, ensuring delivery of the entirety of the route from Sidford to Sidbury. Vehicle access to the site will be via A375.

In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented.

The site is within the East Devon National Landscape and particular care will be needed to avoid adverse impacts, especially on higher westerly site parts where open space provision may be appropriate. Listed buildings are found to the north and east of the site and the Sidbury Conservation Area also lies to the north; proposals will need to be carefully designed to avoid detrimental impacts on these heritage assets.

## **Tipton St John**

### **Strategic Policy SD27: Development at Tipton St John**

The site/area listed below, as identified on the Policies Map, is allocated for development.

#### **Land South of Otter Close (Otry\_04)**

This site is allocated for up to 5 self-build homes and a new primary school. Development of the dwelling will only be allowed once building work on a new school (on this site or elsewhere in or at the village) is completed and occupied. Should a new school not be built in Tipton St John the village would not meet the thresholds for a Tier 4 settlement and new houses will not be permitted at this site

## **West Hill**

### **Strategic Policy SD28: Development at West Hill**

The sites/areas listed below, as identified on the Policies Map, are allocated for development.

#### **Land adjoining Wind Mill Lane (West\_04)**

The site is allocated for around 34 dwellings. The site will need to deliver safe and accessible walking and cycling routes through to the primary school, shop and other facilities at the centre of the village via West\_18 and adjoining land.

#### **Land north and east of Eastfield (West\_18)**

This site is allocated for around 30 dwellings. The site will need to deliver safe and accessible walking and cycling routes through to the primary school, shop and other facilities at the centre of the village via adjoining land. The woodland in the northern part of the site must be retained and enhanced.

## Whimble

### Strategic Policy: SD29: Development at Whimble

#### Land at Station Road (Whim\_11)

This site is proposed for 33 new homes. Part of the site is at risk of flooding and a Level 2 SFRA has been undertaken, the results of which should be taken into account in any development proposals. There may be a need for a site-specific Flood Risk Assessment at this site to assess the risk of fluvial and surface water flooding and therefore to inform development proposals.

A line of trees to the site frontage and two trees within the field are subject to Tree Preservation Orders. These must be retained in development proposals.

Site layout should be planned to enable convenient east to west pedestrian and cycle links to the site frontage, but behind the existing hedge and protected trees. A pedestrian access opposite the Withy should be provided if compatible with protection of trees and highway safety. Careful attention should be paid to the setting of Sleuton House, a Grade II listed building.

#### Land west of Bramley Gardens (Whim\_08a)

The site is allocated for 50 homes and a community orchard. The residential development element of the scheme should be located south of the existing Bramley Gardens development. Provision of an orchard, that could include open space provision associated with new housing, will be encouraged on land to the north of the new houses.

# Chapter 6. Mitigating Climate Change

## Reducing emissions and promoting low carbon and renewable energy development

- 6.1. The climate crisis is urgent, with the 2021 IPCC report highlighting unprecedented warming and irreversible consequences. In response, East Devon District Council declared a climate emergency in 2019, committing to carbon neutrality by 2040 and endorsing the Devon Carbon Plan.

### Strategic Policy CC01: Climate Emergency

The East Devon target is to become carbon neutral by 2040, this overarching strategic policy for climate emergency requires developments to support East Devon becoming carbon neutral by 2040, through:

1. Delivering net-zero development; and
2. Maximising opportunities for delivery of low carbon and renewable energy, district heat networks, and energy storage facilities.

Any development that by the nature of development design or subsequent operations will generate significant emissions will need clear justification for development that articulates how carbon saving approaches and methods, in design and operation, are incorporated into proposals.

### Justification for plan policy

- 6.2. This policy sets a target of achieving carbon neutrality in East Devon by 2040, aligning with the Council's climate emergency declaration. Subsequent policies in this chapter provide specific measures to achieve this overarching goal.

### Policy CC02: Net-Zero Carbon Development

#### All new homes

All new homes (including conversions) will be required:

1. to meet energy efficiency requirements set out in the building regulation Future Homes Standard (FHS) 2025 or successor standards. If the FHS 2025 is not incorporated into Building Regulations by the date of Local Plan adoption, the

draft standards as set out in - The Future Homes and Buildings Standards: 2023 consultation - GOV.UK ([www.gov.uk](http://www.gov.uk)) will be required in developments. And

2. To be developed in a manner that ensures solar panels, heat pumps and other technologies (if not part of the initial development) can simply be fitted to and wired into new developments (with nil or minimal retrofitting). And
3. To be designed to avoid temperature discomfort as a result of rising temperatures.

### **Major non-residential new development**

All major non-residential developments will be required to meet the latest BREEAM “Excellent” standard (or technical equivalent) unless it is demonstrated they cannot technically be complied with or render a proposal non-commercially viable. When the BREEAM “Excellent” standards are considered unachievable this should be supported by robust evidence.

### **All development**

All developments will be required to demonstrate at the application stage that the relevant standards set out above will be achieved and that minimising the carbon footprint of the proposed development has informed the design and layout of the development. The agreed measures will be secured by either a condition or Section 106 agreement and developers will be required to submit a compliance certificate to demonstrate compliance following completion.

- 6.3. Ensuring new developments are energy efficient is fundamental to reducing carbon emissions. The policy follows the "energy hierarchy," prioritising building fabric improvements over renewable energy retrofits. Major non-residential developments must meet BREEAM “Excellent” standards, a widely recognised third-party accreditation for sustainability.
- 6.4. The policy aligns with national regulations and prioritises interventions to meet the net-zero target. Encouraging energy and carbon statements helps demonstrate a zero-carbon approach to construction and operation, promoting self-sufficiency in energy, waste, and water management.





**Development location:** Minimise need to travel and provide access to sustainable transport

**Site master planning:** Optimise use of natural light and heat through solar master planning

**Building fabric:** Maximise thermal efficiency through high performance fabric

**Building services:** maximise efficiency of fixed building services (heating, cooling, ventilation and lighting)

**Clean onsite energy:** Incorporate renewable/zero carbon energy to reduce unavoidable emissions

**Offsite measures:** Finance offsite carbon reduction measures where onsite measures are impractical

**In-use performance:** Ensure actual performance aligns with design intent.

The Energy Hierarchy

## Promoting Low Carbon and Renewable Energy

- 6.5. Encouraging low carbon and renewable energy developments is crucial for achieving climate objectives and ensuring sustainable energy sources.

## Strategic Policy CC03: Promoting low carbon and renewable energy

Proposals for low carbon and renewable energy generating and storage schemes within the district will be supported in the context of sustainable development and climate change, provided that:

- There are no significant adverse impacts on the local environment that cannot be satisfactorily mitigated, including individual and cumulative landscape and visual impacts, as well as the character of wider historic townscapes, landscapes and seascapes; protected species and sites of ecological/geological importance, and
- Any farmland that is used allows for the continuation on the site for some form of appropriate agricultural activity or bio-diversity use proportionate to the scale of the proposal; and
- Appropriate plans and a mechanism are in place for the removal of the technology on cessation of energy generation/ storage, and restoration of the site to its original use or an acceptable alternative use.

Development located within or affecting the setting of National Landscapes and the undeveloped coast, unless visual and other adverse impacts can be shown to be minimal or nil will, only be permitted where evidence shows that exceptional circumstances exist to justify development. Such development should be, where acceptable, small scale giving due regard to the natural beauty of these areas.

Proposals for wind farms will only be allowed in defined areas as shown on the Policies Map.

Planning permission for fossil fuel electricity or other energy generation will only be granted where there is a clear and compelling need for the project that addresses a recognisable system failure, and all viable renewable energy options, including energy storage solutions, must be thoroughly explored and deemed unsuitable for fossil fuels schemes to progress.

## **Justification for Plan Policy**

- 6.6. The policy promotes low carbon and renewable energy technologies, such as geothermal, hydro, wind, solar, and anaerobic digestion systems, to ensure a sustainable energy supply. It identifies suitable areas for solar and wind energy developments while protecting sensitive areas, ensuring minimal environmental impact. The Low Carbon Study has identified areas suitable for these developments, excluding the most sensitive areas of the district.
- 6.7. Fossil fuel energy generation is only permitted in exceptional circumstances, such as for essential services like hospitals that require backup power. This approach supports the transition to renewable energy sources, contributing significantly to the district's climate objectives and reducing reliance on fossil fuels.

## **Energy Storage**

- 6.8. Renewable energy generation often does not align with peak consumption times. Energy storage solutions are essential to balance this discrepancy and support the transition to renewable energy.

## Strategic Policy CC04: Energy Storage

Planning permission will be granted for electrical and other energy storage facilities to help achieve carbon neutrality and support renewable energy production and use in East Devon.

Proposals for development must have no significant and unacceptable adverse impacts on account of noise or environmental or amenity impacts. All schemes will need to be compliant with the most up to date guidance on fire safety and other health and safety matters.

Proposals should be located in or on the edge of built-up areas, and outside of protected landscape areas, unless alternative site options do not exist and locational requirements are so significant that a rural location is essential.

Proposals should not be in direct conflict with any policy in the plan that allocates land for a different specified use or safeguards land unless the energy storage facility can be accommodated without compromising the policy intent and use of that land for the allocated purpose.

- 6.9. Energy storage technologies, including battery storage, allow surplus electricity to be stored and used when needed, facilitating the replacement of fossil fuels with renewable energy. This technology is crucial for a flexible energy system and reducing emissions to net zero. Battery storage systems are particularly important as we transition to electric vehicles and shift demand from peak times.
- 6.10. Favoured locations for storage are near suitable substations to provide grid services. The Low Carbon Study highlights the importance of energy storage in achieving climate goals. Fire safety is a critical concern for battery energy storage systems (BESS). To address this issue, applications for new BESS projects must comply with the best available and most up to date guidance that exists. This should include, at the least, the latest National Fire Chiefs Council Guidance<sup>6</sup> though superseding guidance that may come through will also need to be complied with. Likewise best and most up to date guidance on any other safety matters or concerns should inform and be addressed in development proposals.

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<sup>6</sup> Grid Scale Battery Energy Storage System Planning - Guidance for FRS, 2023: <https://nfcc.org.uk/wp-content/uploads/2023/04/Grid-Scale-Battery-Energy-Storage-System-planning-%E2%80%93-Guidance-for-FRS-April-2023.pdf>



FIGURE 6 Example battery storage facility

## Strategic heat networks

- 6.11. Strategic heat networks distribute heat from central plants to various consumers, offering a more efficient heating solution than individual boilers.

### Strategic Policy CC05: Heat Networks

For all major developments proposed within 1km of an existing heat network connection to the existing heat network should be provided.

When the connection is deemed undeliverable, evidence should be submitted to the planning authority's satisfaction to demonstrate why connections cannot be reasonably achieved. If the connection from the point of occupation cannot be provided, the development will be expected to incorporate, where feasible, infrastructure for future connection to the Heat Networks.

In addition, proposals above 1,200 homes or 10 ha of commercial floor space, if not connecting into an existing heat network will be required to provide their own network, unless it is demonstrated to be technically not achievable or significantly undermines commercial viability of development. Where allocation sites abut or are in close proximity to other allocation sites or developments, and the collective

scale of development will exceeds these thresholds, developers and applicants should work together to secure connections for the wider development schemes.

- 6.12. Heat networks are essential for meeting climate targets, with the Committee on Climate Change suggesting that 20% of heating will need to come from district heating by 2050. East Devon is well-positioned to embrace this trend, with existing networks at Cranbrook and Monkerton.
- 6.13. The Low Carbon Study identifies opportunities for matching heat supply and demand and suggests that large-scale developments should investigate the potential for heat networks. The Local Plan's large-scale allocations present opportunities to utilise waste heat and connect to existing networks, increasing their efficiency and reliability.

## **Embodied carbon**

- 6.14. The manufacture of building materials is a major source of greenhouse gases. Using existing building stock in development projects can significantly reduce embodied carbon.

### **Strategic Policy CC06: Embodied carbon**

All development proposals should demonstrate actions taken to minimise embodied carbon and developers should retain existing buildings unless it can be demonstrated that refurbishment is either commercially unviable or impractical or has demonstrable comparative negative impacts.

Major development will be required to undertake an embodied carbon assessment, submitted as part of the Sustainability statement through a nationally recognised Whole Life Cycle Carbon Assessment procedure.

- 6.15. The environmental impact of producing construction materials is significant, with concrete alone responsible for 8% of global emissions. The Royal Institution of Chartered Surveyors (RICS) estimates that 51% of the lifecycle carbon from a typical residential dwelling is emitted before the building is even occupied, and 35% for office developments.
- 6.16. Embodied carbon assessments should follow an endorsed methodology, such as the RICS Professional Statement Whole Life Carbon Assessment for the Built Environment, to accurately measure and reduce lifecycle carbon emissions. This

policy encourages the retention and refurbishment of existing buildings to minimise the carbon footprint of new developments.

Draft document

# Chapter 7. Adapting to Climate Change

## Flood Risk

- 7.1. National policy on flooding must be considered for developments at risk of flooding. The plan's policies and allocations are informed by a Strategic Flood Risk Assessment (SFRA), which should also guide neighbourhood plans and development decisions. The SFRA provides a comprehensive analysis of flood risks from various sources, including rivers, the sea, and surface water, and incorporates future scenarios accounting for climate change.
- 7.2. Developers are encouraged to consult with East Devon District Council, Devon County Council, the Environment Agency, and South West Water early in the planning process to address flood risk, site-specific Flood Risk Assessments (FRAs), and appropriate mitigation measures. The Environment Agency is updating national flood risk information, which will include future climate change scenarios. This new data will be incorporated into the SFRA and may necessitate changes to the plan.

### Strategic Policy AR01: Flooding

All development should minimise the impact and mitigate the likely effects of climate change on existing and future occupants, together with the wider community and environment, through the delivery of developments and communities which are resistant and resilient to future floods. This will be achieved by:

- a. Requiring development proposed in a flood risk location from any source to demonstrate that there is no sequentially preferable location and, if necessary, that development complies with the exception test (unless this has been undertaken through a site allocation in this plan).
- b. Requiring a Flood Risk Assessment (where appropriate in terms of national planning policy and guidance) which demonstrates that the development, including the access and egress, will be safe for its lifetime, without increasing or exacerbating flood risk elsewhere and where possible will reduce flood risk overall. For areas within 5 meters horizontal distance of Flood Zone 2, where there is no



detailed modelling, assessment of this Zone with climate change will need to be undertaken in accordance with the most up-to-date Environment Agency hydrology, hydraulic modelling and flood risk mapping. Any flooding measures proposed in the FRA should respond to the specific requirements of the site and respect the character and biodiversity of the area. These FRAs should also identify opportunities for the development to provide wider community flood risk benefit through measures such as additional storage on site (oversized SuDS, natural flood management techniques, green infrastructure and green-blue corridors), and/ or by providing a Partnership Funding contribution towards any flood alleviation schemes.

Where a Level 2 SFRA has been undertaken on an allocated site, the 'Requirements and guidance for site-specific Flood Risk Assessment' set out in the relevant site sheet should be taken into account when submitting an application and designing a scheme.

- c. Ensuring that space is provided on all development sites for the inclusion of SuDS designed to reduce the volume and rate of runoff to less than greenfield rates, as informed by the 'Sustainable Drainage System – Guidance for Devon'. Surface water run-off should be managed as close to the source as possible. Preference will be given to systems that reduce pollution risks and contribute to the conservation and enhancement of biodiversity and green infrastructure where practicable. Within Critical Drainage Areas, SuDS should result in a reduction of existing runoff rates.
- d. Protecting land required for flood management, including natural floodplains.
- e. Not permitting proposals for basements in areas at risk of flooding.
- f. Where appropriate, the opportunity for Natural Flood Management in rural areas, SuDS retrofit in urban areas and river restoration should be maximised. Culverting should be opposed, and day-lighting existing culverts promoted through new developments.

The SFRA has shown that some catchments are at a high risk of cumulative flooding. In these areas, development proposals should help to reduce flood risk overall by demonstrating that:

- a. The design and layout of the proposed development safeguards any areas identified in the Natural Processes Mapping for floodplain reconnection, riparian woodland, additional floodplain woodland or runoff attenuation features.

- b. Any FRA considers the potential cumulative effects of all proposed development and how this affects sensitive receptors.
- c. There is a suitable surface water management plan for storm events during construction to support the Construction Drainage Phasing Plan.

### **Justification for inclusion of policy**

- 7.3. Certain areas in the District face flood risks from rivers, the sea, and surface water, which are likely to worsen with climate change. The NPPF advises directing development away from high-risk flood areas. This policy is based on the recommendations of the SFRA.

## Water supply

- 7.4. Population growth, climate change, and environmental protection measures put pressure on water resources, contributing to water stress. This policy addresses these issues.

### Strategic Policy AR02: Water Efficiency

To minimise impact on the water environment all new dwellings should achieve the Optional Technical Housing Standard of 110 litres per day per person for water efficiency as described by Building Regulation G2.

### Justification for inclusion of policy

- 7.5. Building Regulations set a water efficiency standard of 125 litres per person per day, with an optional requirement of 110 litres per day for new residential development. The water cycle study provides evidence for adopting the stricter standard of 110 litres per day in East Devon to address water stress.

## Coastal change

- 7.6. East Devon faces significant challenges from coastal erosion and increased risk of permanent coastal flooding, exacerbated by climate change. While coastal defences may be appropriate in some areas, they are often costly and environmentally damaging. In many cases, allowing natural processes to occur is the best approach. This plan identifies potential impacts and develops policies to ensure risks are considered in development decisions.

### Coastal change management areas

- 7.7. We have collaborated with the University of Plymouth to predict coastal erosion and flooding, mapping areas vulnerable to coastal change over the next 20, 50, and 100 years. This work, aligned with the National Planning Policy Framework, forms the basis for identifying Coastal Change Management Areas (CCMAs). Detailed assessments, such as Beach Management Plans, have refined these areas.
- 7.8. The Environment Agency will publish updated national flood and coastal erosion risk data in December 2024, which will be considered before finalising the plan. Given the complexity of this topic, supplementary planning guidance is recommended to detail the practical implementation of the CCMA approach

## Policy AR03: Coastal Change Management Areas (CCMAs)

Within the Coastal Change Management Area (CCMA) defined on the Policies Map, proposals for new residential development, including the conversion of existing buildings, will not be permitted.

Applications for non-residential development within the CCMA will be assessed in relation to the most up-to-date evidence available for when coastal change can be expected so that:

**0-to-20-year time horizon** - In parts of the CCMA expected to be at risk within a 0-to-20-year time horizon (2020 to 2040), only the following developments will be allowed:

- temporary development directly related to the coast, such as beach huts, cafes, car parks or sites used for touring caravan and camping;
- temporary modifications to other existing commercial facilities where a positive link can be made to the local economy;
- mitigation measures for dealing with coastal change that are in accordance with the relevant coastal strategy or
- nationally significant infrastructure projects related to offshore development that are constructed to withstand the impacts of the expected coastal change.

**20-to-50 year time horizon** - In parts of the CCMA expected to be at risk within a 20-to-50 year time horizon (2040 to 2090), in addition to the development allowed in the 0 to 20 years zone the replacement, relocation and adaptation of infrastructure, commercial and community uses will be permitted, providing they require a coastal location and provide economic and/or social benefits to the local community.

**50 to 100 year time horizon** - In parts of the CCMA expected to be at risk within a 50 to 100 year time horizon (beyond 2090), in addition to the development allowed in the 0 to 50 year zones, extensions to residential properties and householder applications may be acceptable.

All applications for development within a CCMA must show that it would not result in an increased risk to life or any property through the submission of a coastal change vulnerability assessment, which should be proportionate to the scale and nature of the development.

Planning permission for all development in a CCMA will be time limited according to the risk identified in the coastal erosion vulnerability assessment.

## **Justification for inclusion of policy**

- 7.9. The NPPF requires plans to reduce the risk of coastal change by avoiding inappropriate development in vulnerable areas and identifying Coastal Change Management Areas (CCMAs). CCMAs are not necessary where the Shoreline Management Plan policy is to 'hold the line' and can be maintained over the plan's lifetime. Generally, the centres of main coastal settlements are defended, so CCMAs are not identified for town centres. This policy aligns with national guidelines and will be supported by supplementary planning guidance for detailed implementation.

## **Relocation of uses affected by coastal change**

- 7.10. Where evidence shows that certain existing uses are vulnerable to coastal change in the short term, relocation to safer areas may be allowed.

### **Policy AR04: Relocation of uses affected by coastal change**

Where there is robust evidence to demonstrate that permanent homes (with unrestrictive occupancy) or community facilities, commercial or business uses that are considered important to coastal communities are likely to be affected by coastal erosion within 20 years of the date of the proposal, proposals for relocation/replacement, including outside of settlement boundaries, will be considered favourably subject to the following criteria:

- a. The new development is located in an area at less risk of coastal erosion;
- b. The replacement property is located close to the community from which it is displaced and has an acceptable relationship with it in terms of character, setting, local amenity and any special landscape designations;
- c. Overall, taking both the existing and proposed buildings into account, the proposal should not have an additional detrimental impact on the landscape, townscape or biodiversity of the area, taking into account any special designations;
- a. The existing site is either cleared and restored with enhancements for nature conservation or put to use to benefit the local community within three months of the first use of the replacement. The future use of the site

should be secured in perpetuity and provision made for public access to the coast where appropriate.

- d. In the case of a residential proposal, the gross volume of the replacement dwelling is no larger than the one it is to replace.

## **Justification for inclusion of policy**

- 7.11. Some buildings and uses may be lost to the sea within the plan period. This 'rollback' policy provides flexibility for relocation if necessary.

## **Development affecting coastal erosion**

- 7.12. The national and local approach to coastal erosion, as set out in the Shoreline Management Plan (SMP), is to defend main settlements and allow natural processes in rural areas. Large parts of the coastline are inscribed as a World Heritage Site, which relies on natural processes continuing.

## **Strategic Policy AR05: Development affecting coastal erosion**

Where compatible with the most up-to-date coastal policy (as expressed in the SMP or a strategy such as a beach management plan), the Council will promote proposals for sustainable coastal change management such as improvements to coastal defences or managed realignment, provided that they would not have an unacceptable adverse economic, social or environmental impact, including an unacceptable detrimental visual impact on a protected landscape.

To protect the integrity of the Dorset and East Devon World Heritage Site, the natural processes that created it will be allowed to continue, unless the safety and economic well-being of any coastal community would be undermined, provided that the implications of this for the World Heritage Site have been fully considered.

Where there is a conflict between allowing coastal erosion and protecting coastal communities from that erosion both interests will be recognised and wherever possible impacts will be mitigated where they arise.

Schemes that are incompatible with coastal policy are will not be supported.

## **Justification for inclusion of policy**

- 7.13. This policy balances the need for protective measures with the integrity of the World Heritage Site, which relies on coastal change processes. Both interests will be assessed in planning proposals to guide decision-makers and determine mitigation measures. This policy is relevant for applications like rock groynes/islands in beach management plans.

## **Links to marine planning**

- 7.14. The NPPF requires local plans to consider the UK Marine Policy Statement and marine plans. The South Marine Plan covers marine activities and overlaps with land planning in the intertidal zone. No conflicts have been identified between the marine and local plans.

Draft document

## Chapter 8. Meeting Housing Needs

- 8.1. This strategic policy aims to meet the housing needs of East Devon by providing a mix of decent, affordable homes that are safe, secure, and adaptable to changing needs.

### Strategic Policy HN01: Housing to address needs

All proposals for housing, including those affecting the existing housing stock, will contribute to creating sustainable, inclusive and mixed communities in East Devon. This will be achieved by providing an appropriate mix of decent, good quality homes which meet identified needs for housing as identified in a neighbourhood plan, local needs assessment or other evidence document over the plan period, at locations consistent with the settlement hierarchy and the spatial strategy.

#### To achieve this the Council will:

- a. Seek to maximise the delivery of affordable housing across East Devon in order to meet identified needs of people who are not able to access the general housing market
- b. Support proposals for the development of specialist accommodation that increase choice, including for older, vulnerable and disabled residents
- c. Support development of dwellings most suited to younger people noting the importance of homing, supporting and nurturing a younger workforce in the district
- d. Seek the use of good quality adaptable housing designs that provide flexible internal layouts and will allow for cost-effective alterations to meet changing needs over a lifetime and reduce fuel poverty
- e. Work with developers, registered providers, landowners and relevant individuals or groups to address identified local demand for self and custom build homes as identified in the East Devon Self and Custom Build Register
- f. Support the retention and improvement of private rented accommodation, the provision of shared accommodation for single people, and proposals for the development of community-led housing schemes.



Proposals for housing development will be supported where they broaden choice and reflect and respond to the existing and future needs as identified in the Local Housing Needs Assessment or successor documents, and in up-to-date local housing need evidence assessments.

Proposals for housing development will provide a mix of house types, tenures and sizes appropriate to the area. This will be subject to the ability of a site to accommodate a mix of housing, and relevant, up to date evidence of market conditions. Housing mix will be achieved by:

- a. Inclusion of affordable housing to meet affordable housing needs over the plan period, particularly the needs of younger people.
- b. A range of housing suitable for households with specialist needs, including:
  - Dwellings for older people who want to retain independent living;
  - Adaptable and accessible housing and wheelchair user housing
  - Use Class C2 accommodation including care homes
- c. Market housing for rent as well as for home ownership
- d. Serviced plots of land for self-build and custom housebuilding
- e. Gypsy and Travellers and Travelling Showpeople accommodation

## **Justification for inclusion of policy**

- 8.2. The policy ensures housing development addresses local needs, supporting sustainable, inclusive communities. It aligns with national policy requirements and provides a framework for other housing policies, avoiding duplication. The policy aims to deliver affordable housing, specialist accommodation, and adaptable designs to meet diverse and evolving needs. Key evidence is provided by the Local Housing Needs Assessment 2022, which identifies local housing demands and needs for specific groups.

## **Affordable housing**

- 8.3. Affordability and lack of sufficient affordable housing are major issues in East Devon, with high house prices and rents. This policy aims to increase affordable housing, particularly for young households, in line with national and local plans.

## Strategic Policy HN02: Affordable Housing

To foster balanced and mixed communities affordable housing will be required on all developments, unless exempted under this policy, with a capacity of 5 or more dwellings in designated rural areas and 10 or more in non-designated rural areas. Specifically included under policy are schemes for specialist housing for older people where the site is delivering self-contained units (C3 and C2). Provision must accord with the levels set out below.

Location	Affordable housing as a percentage of the site total	Tenure mix of the affordable housing requirement
Second new town	New town % to be defined through bespoke viability work for the new town – to be defined through further Reg 19 consultation.	New town % to be defined through bespoke viability work - see further Reg 19 consultation.
Rest of East Devon (excluding Cranbrook Plan area)	<p><b>35% affordable housing at:</b></p> <ul style="list-style-type: none"> <li>Any site allocated for development at the West End (see plan chapter 4)</li> <li>Any development in Sidmouth and Budleigh Salterton, as defined by settlement boundaries.</li> <li>Any site across any part of East Devon that is not allocated for housing development and that comes forward as a windfall site.</li> </ul> <p><b>30% affordable housing at:</b></p> <ul style="list-style-type: none"> <li>All other local plan allocated sites (with the exception of at Axminster).</li> </ul>	<ul style="list-style-type: none"> <li>65% Social Rent</li> <li>35% Intermediate or other forms of affordable housing</li> </ul> <p>At Axminster there will be flexibility, through consideration of viability assessments and where schemes are non-viable, to</p>

	<b>25% affordable housing at:</b> <ul style="list-style-type: none"> <li>• Axminster, as defined by the settlement boundary.</li> </ul>	vary tenure percentages.
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Affordable housing secured through policy must:

- remain affordable in perpetuity. Legal agreements will make provision for achieving clawback on long term, phased schemes if affordable housing is converted to another tenure, and
- be provided on-site and dispersed in small clusters across the site in a way that is indistinguishable in terms of design and materials from any market housing.

Off-site provision or financial contributions will only be acceptable where on-site provision cannot be achieved or is non-viable or it can be clearly established that off-site provision will generate better affordable housing delivery outcomes.

Affordable housing should provide a mix of property sizes and types across the site, demonstrating how the site responds to robust, up to date evidence about housing need.

Where the requirements set out in this policy are not proposed to be met, applicants must submit development viability evidence to justify departure. Where a lower percentage level, or differing tenure mix, of provision is agreed on viability grounds developers will be required to enter into an agreement that allows affordable housing contributions to be made in the future should higher levels become viable (e.g. through an 'overage' clause). The Council will also reappraise viability on subsequent phases of large schemes.

Where Build to Rent schemes are proposed as part of the mix, at least 20% will need to be affordable private rent homes provided on site at a level of at least 20% discount. All homes on the scheme will be managed collectively by a single build to rent landlord.

Residential institutions (including C2 care homes and student accommodation) and gypsy and traveller accommodation are exempt from this policy.

## Justification for inclusion of policy

- 8.4. This policy ensures the delivery of affordable housing to support balanced and mixed communities. It aligns with national and local policies, addressing the need for affordable homes due to high prices and rents. The policy specifies affordable

housing requirements for different areas and types of development, ensuring affordability in perpetuity and integration with market housing. Off-site provision or financial contributions are considered only when on-site provision is unfeasible. The policy is supported by local evidence from the East Devon Local Housing Needs Assessment 2022, ensuring it meets the district's needs.

## **Housing to meet the needs of older people**

- 8.5. This policy aims to widen housing choices for older people in East Devon by securing a diverse supply of market and affordable housing, including specialist accommodation.

### **Policy HN03: Housing to meet the needs of older people**

The Council will support development that widens choice by securing a more diverse supply of market and affordable housing for older people in East Devon. Specialist affordable housing for older people, falling under this policy, will specifically include:

- Residential care homes and nursing homes
- Extra care housing or housing-with-care
- Retirement living or sheltered housing
- Age-restricted general market housing

Any development proposals with housing to accommodate older people will need to:

- demonstrate how the design and layout addresses the health and well-being needs of older people including, where appropriate to the proposal, those with dementia and other long-term conditions
- locate all older person housing within 400 meters walking distance of local facilities and shops
- be well-served by public transport
- have high levels of accessibility with flat or relatively flat neighbouring topography, dropped kerbs and pedestrian road crossings to promote access by ambulant older people, wheelchair users and mobility scooters;

- provide adequate communal facilities, including on-site accommodation where required, for essential staff
- Be supported by a Care Needs Assessment to justify the development proposal's scale, tenure and accommodation type

Planning applications for different types of specialist housing for older people, will be determined on the basis that:

- **Use Class C3 (dwellings)** - Market accommodation for older people in the form of age restricted general market housing, retirement living or sheltered housing and extra care housing or housing with care are in Use Class C3 (dwellings).
- **Use Class C2** - Residential care home and nursing home accommodation (including end of life/hospice care and dementia care home accommodation) are in Use Class C2.
- The Use Class of other specialist housing products will be determined taking into consideration the level of care and scale of communal facilities.

All general housing proposals, subject to commercially viability, will be required to deliver specialist housing for older people as follows:

- Schemes for 50 to 199 dwellings should include at least 10% of dwellings on-site as specialist older person dwellings (Use Class C3)
- Schemes for 200 or more dwellings should include at least 10% as on-site specialist older person dwellings as either C3 dwellings and/or C2 equivalents.

Planning permission that would result in the loss of specialist elderly person housing will be refused unless:

- evidence demonstrates that there is no longer a need in East Devon for that type of housing; and also
- The housing cannot be converted to meet other types of older person need, or that conversion, remodelling, or redevelopment to specialist housing to meet other social care and health needs is not viable.

## Justification for inclusion of policy

- 8.6. This policy addresses the growing need for diverse housing options for East Devon's ageing population. It supports the development of specialist housing, such as care homes and extra care housing, ensuring these are well-designed, accessible, and located near local facilities.
- 8.7. The policy requires developments to demonstrate how they meet the health and well-being needs of older people, including those with dementia. It also mandates a mix of housing types and sizes, with a minimum percentage of specialist housing in larger developments. The policy aligns with national guidelines and local evidence, including the Local Housing Needs Assessment 2022, to ensure it meets the district's needs.

## Accessible and Adaptable Housing

- 8.8. This policy ensures new homes in East Devon are accessible and adaptable, meeting current and future needs by adhering to specific building regulations.

### Policy – HN04: Accessible and Adaptable Housing

To ensure that new homes provide quality living environments for residents both now and in the future, the following standards from Building Regulations Approved Document M: Volume 1 (Access to and use of dwellings) (or replacement standards) will apply to new dwellings, subject to consideration of site suitability and site viability:

- 100% of all new dwellings will meet building regulation M4 (2) requirements (accessible and adaptable dwellings).
- 100% of all new specialist accommodation for older people will meet regulation M4 (3) requirements (a) or (b) (wheelchair user dwellings).
- 100% of new specialist accommodation for older people will meet regulation M4 (3) (2) (b) requirements (wheelchair accessible dwellings) for those dwellings where the local authority is responsible for allocating or nominating a person to live in a dwelling.
- At least 5% of all new affordable housing for rent will meet building regulation M4 (3) (2) (a) requirements (wheelchair adaptable).

- At least 5% of all new affordable housing for homeownership will meet regulation M4 (3) (2) requirements (a) or (b) (wheelchair user dwellings).

When providing wheelchair user housing, early discussion with the Council is required to obtain the most up to date information on specific need for this type of housing in the local area.

## **Justification for inclusion of policy**

- 8.9. This policy mandates that all new dwellings meet accessibility and adaptability standards, supporting residents with varying needs. It aligns with the government's approach to sustaining people at home and requires compliance with Building Regulations M4(2) and M4(3).
- 8.10. The East Devon Local Housing Needs Assessment 2022 highlights the growing need for accessible homes due to an ageing population. By 2040, an additional 12,959 households will need either adaptations to their existing homes or new accessible housing.
- 8.11. The policy specifies that 100% of new dwellings must meet M4(2) requirements, ensuring they are accessible and adaptable. For specialist accommodation for older people, 100% must meet M4(3) requirements, with specific provisions for wheelchair user dwellings.
- 8.12. At least 5% of new affordable housing for rent and homeownership must meet M4(3) requirements, addressing the need for wheelchair adaptable and accessible homes. Early discussions with the Council are required to obtain up-to-date information on the specific need for wheelchair user housing in the local area.
- 8.13. The policy aligns with national guidelines, including the NPPF and PPG on Housing for Older and Disabled People. It ensures that plans use optional technical housing standards to bring forward an adequate supply of accessible housing. The percentages and circumstances for these requirements are guided by evidence from the Local Housing Need Assessment 2022 and the Local Plan spatial strategy.
- 8.14. The Council's ability to require wheelchair accessible housing is limited to dwellings where it is responsible for allocating or nominating residents. These are typically affordable dwellings for social or affordable rent, secured through S106 legal agreements. Planning applications should include an Affordable Housing Statement detailing the number and types of affordable housing units.

- 8.15. Where site conditions or viability preclude the provision of specialist housing, the policy requires that housing meets at least M4(1) standards. This ensures that all new housing provides a basic level of accessibility, even if higher standards cannot be met.

## **Self-Build and Custom Build Housing**

- 8.16. This policy supports custom and self-build housing to meet diverse housing needs, encourage high-quality design, and provide opportunities for individuals to build their own homes.

### **Policy – HN05: Self-Build and Custom Build Housing**

As part of meeting housing needs, securing greater housing diversity and encouraging high quality design, proposals for custom and self-build housing, to be occupied by those persons commissioning or undertaking the construction, will be supported.

At least 5% of dwellings on sites planned to accommodate 20 or more homes must be delivered as serviced custom and self-build plots.

The agreed plots should:

- a. Be actively marketed to individuals and custom build companies (as appropriate) in accordance with a marketing and pricing strategy that shall be agreed in writing with the Local Planning Authority in advance of a plot/s being first marketed. All plots shall be marketed at a reasonable price to reflect market conditions for at least 24 months from being fully serviced and developable. Any plots that have not been sold after 2 years of being continuously marketed in accordance with this policy shall be made available for development on the open market;
- b. Have suitable road access delivered at an early stage in the development;
- c. Be of a size that reflects local demand and, where more than one plot is provided, a variety of sizes should be offered to reflect the range of local demand;
- d. Be offered for sale with no legal or physical restrictions that would prevent immediate purchase and development;
- e. On sites of over 250 dwellings or more, a proportion of plots must be made available for affordable housing, to be secured through legal agreement, subject to viability;



- f. On sites of over 100 dwellings or more, design codes should be used flexibly to encourage high quality housing design and the agreed design code should be used to provide 'plot passports' that provide a simple, succinct summary of each plot as a reference point for the purchaser.

All self and custom-built housing must be completed within 3 years of the self or custom builder purchasing the serviced and developable plot.

## **Justification for inclusion of policy**

- 8.17. Custom and self-build housing contributes to the overall housing supply, offering an alternative to mainstream housing delivered by large developers. It allows individuals to tailor homes to their specific needs and can lead to cost savings, as there is no developer profit. This approach can boost housing supply, diversify land use, and widen housing choices.
- 8.18. Communities benefit from custom and self-build homes through improved design, build quality, and environmental sustainability. These homes often use modern construction methods and high specifications, enhancing the sustainability of the housing stock. Additionally, self-build projects can support local businesses and create employment opportunities by engaging local tradespeople and supply chains.
- 8.19. This policy does not apply to off-plan housing, where homes are purchased before construction without buyer input into design and layout. Instead, it focuses on self-build models, including individual projects, community collaborations, and supported community self-builds. These models can involve various organizations, such as Community Led Housing Groups, Community Land Trusts, Co-operatives, and Cohousing groups.
- 8.20. Under the Self Build and Custom Housebuilding Act 2015, the Council maintains a register of individuals seeking serviced plots for self-build and custom housebuilding. The Council must consider this register and provide suitable development permissions to meet identified demand. The Act defines self-build and custom build housing, ensuring clarity and consistency in policy application.
- 8.21. Since 2016, the Council has kept a register of people interested in building their own homes in East Devon. This register provides insights into the level of interest, budget constraints, and location preferences of potential self-builders.

## Sub-dividing or replacing existing dwellings

8.22. This policy supports the sub-division and replacement of existing dwellings to meet housing needs, reduce carbon footprints, and reuse existing resources within established communities.

### Policy – HN06: Residential Sub-division of Existing Dwellings and Buildings and Replacement of Existing Dwellings

Any residential sub-division of existing dwellings or buildings must:

- Avoid any materially adverse impact on the character and amenities of the surrounding area or on the existing building;
- Minimise hard surfacing of front gardens and ensure hard surfaced areas are permeable and/or discharge to a soakaway (subject to soil conditions being suitable);
- Ensure that adequate space is provided for bicycle/mobility scooter storage; and
- Provide an adequate external area for car parking, waste/recycling storage and for any shared use area such as outdoor drying of washing.

**Replacement of existing dwelling or conversion of an existing building outside of a Settlement Boundary** - exceptionally, where a replacement dwelling or building conversion can justified outside settlement boundaries all of the above sub-division considerations must be met, and the following criteria must also be met:

- Prior to the first occupation of any replacement dwelling, the dwelling which is to be replaced must be demolished;
- Any replacement dwelling, or building works associated with conversion, must be positioned on the footprint of the existing dwelling, unless there are clear planning or environmental benefit to justify an alternative location within the existing curtilage;
- The height of any replacement dwelling should be no higher than the dwelling to be replaced, and building works associated with conversion must not exceed existing building heights, unless it can be demonstrated that an increase in height will be compatible with and not harmful to neighbouring residential amenities, the street scene or the wider landscape

- The footprint of any replacement dwelling, or subdivided or converted building including any extension, must not exceed by more than 30% of the external volume of the dwelling to be replaced (or the building to be converted/subdivided) and
- The curtilage of the proposed replacement, or subdivided or converted building including any extension, must be no greater in area than that of the existing dwelling/building.

## **Justification for inclusion of policy**

- 8.23. Self-contained flats from house conversions add valuable housing stock and meet changing needs. Reusing and converting buildings reduces the carbon footprint and promotes sustainable development. The policy restricts replacing existing buildings to exceptional circumstances, aligning with the embedded carbon policy.
- 8.24. For sub-divisions, the policy ensures developments avoid adverse impacts on the area, requiring provisions for storage, parking, and sustainable drainage. Replacement dwellings outside settlement boundaries must meet additional criteria, including demolishing the existing dwelling before occupation of the new one and limiting the height and footprint of the new dwelling.
- 8.25. The policy supports the Council's Housing Strategy and aligns with the NPPF's emphasis on sustainable development. It addresses affordability issues, particularly in rural areas, by retaining smaller dwellings. Certain developments, like the reuse of redundant buildings, are not subject to this policy but may be covered by other policies.
- 8.26. The policy promotes effective land use, boosting housing supply through subdivision and conversion. It reduces the risk of dwellings becoming vacant and derelict, preserving housing stock. The policy also mitigates environmental impacts, preserving the character and amenity of the area.

## **Replacement dwellings**

- 8.27. This policy supports householder annexes, extensions, alterations, and outbuildings to meet changing needs while maintaining the character and sustainability of existing dwellings.

## Policy – HN07: Householder Annexes, Extensions, Alterations and Outbuildings

Proposals for ancillary or incidental annexes, extensions, alterations, and outbuildings, relating to existing dwellings shall:

- be of a subordinate scale, form, and mass to the main dwelling and curtilage, and shall accord with the design principles of the Local Plan; and
- be located entirely within the existing curtilage of the main dwelling; and
- not increase the habitable Gross Internal (floor) Area<sup>1</sup> of the original dwelling by more than 30%, unless the increase is required to enable the host dwelling to conform to nationally described technical housing standards<sup>2</sup> for its original intended use. In exceptional circumstances, development may be considered where a minor increase above 30% is justified to improve design standards.

The development of annexes, extensions, alterations, and outbuildings, will not usually be permitted where the host dwelling is:

- an affordable dwelling
- an agricultural worker's dwelling

The development of these properties will need to be fully justified in relation to the need for the additional accommodation and how this is necessary given the restricted use of the property.

A condition and/or legal agreement may be required to control future use as incidental or ancillary to the use of the main dwelling, preventing subdivision or use as a separate planning unit, in perpetuity. Permitted development rights for future extensions or outbuildings may also be restricted by condition.

[Technical housing standards – nationally described space standard - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

[Technical housing standards - nationally described space standards Technical housing standards – nationally described space standard - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

## **Justification for inclusion of policy**

- 8.28. The Council receives many applications for householder extensions, alterations, annexes, and outbuildings. These developments help occupiers meet changing needs without moving.
- 8.29. This policy supports changing housing needs and aligns with the NPPF and PPG on effective land use. It reduces the carbon footprint by reusing existing dwellings and resources, ensuring developments maintain acceptable living standards within communities.
- 8.30. Residential annexes provide flexible accommodation that can adapt to changing family needs, supporting and caring for family members. Annexes should remain ancillary to the main dwelling, avoiding the creation of separate dwellings. They should not be so large that they undermine their subordinate role or become impractical.
- 8.31. Extensions, alterations, and outbuildings add diversity and flexibility to the housing stock but must respond positively to the context and character of existing areas. These developments should not lead to an increase in larger dwellings, reducing the availability of smaller housing and creating an imbalance. Extensions and subdivisions should not create additional dwellings in the countryside.
- 8.32. Permitted development rights allow certain extensions and outbuildings without planning permission if specific conditions are met. This policy addresses those that exceed these limitations, often requiring householder planning permission.
- 8.33. Annexes, extensions, alterations, and outbuildings should not cause unacceptable impacts on occupants or neighbours, such as issues with amenity, light, noise, privacy, and visual impacts

## **Hostels and Houses in Multiple Occupation**

- 8.34. This policy supports the conversion of existing homes and buildings to hostels and Houses in Multiple Occupation (HMOs) while ensuring they meet specific standards to protect the amenities of occupants and neighbours.

### **Policy – HN08: Hostels and Houses in Multiple Occupation (HMOs)**

In circumstances where planning permission is required for the conversion or change of use of existing homes, and buildings in other uses, to shared accommodation including hostels and houses in multiple occupation, permission

will be granted where it can be demonstrated that all of the following matters are addressed:

1. **Privacy of existing homes and gardens of neighbours** - must be maintained and ensured for new occupiers. The existing home or building must be capable of conversion without causing harm to the amenities of future occupants, neighbours and the wider area;
2. **Vehicular access or car parking** – both in terms of highway safety or visual, noise or light impact on neighbours. Provision must be made for on-site car parking and cycle storage facilities, unless it can be demonstrated that the site is sustainably located with access to regular public transport or is within an 800 metre walking distance of a defined town centre;
3. **Service provision** – there should be sufficient space for communal areas at an appropriate standard, to accommodate adequate bin storage and collection, and accommodate other ancillary functions for the increased number of residents;
4. **Living spaces and communal facilities** - are of a good standard and suitable for the intended occupiers, individually and in total

To protect the existing small family housing stock, and to allow for adequate residential space standards in the proposed subdivided dwelling, the subdivision of existing properties of three bedrooms or less will not be permitted.

Applications for Hostels and Houses in Multiple Occupation will need to be supported by evidence how a good standard of management will be provided.

The Council will resist the loss of existing hostels and HMOs, unless there is evidence of a lack of demand for this type of accommodation within the settlement, or there is viability and building condition evidence to demonstrate that retention and improvement of the accommodation is not viable or achievable.

## **Justification for inclusion of policy**

- 8.35. HMOs are properties occupied by unrelated individuals sharing basic amenities. This policy ensures conversions to HMOs maintain privacy, provide adequate vehicular access and parking, and include sufficient communal areas. It also requires good living standards and management evidence.
- 8.36. To protect small family housing, the subdivision of properties with three bedrooms or less is not permitted. The Council will resist the loss of existing HMOs unless there is evidence of a lack of demand or viability issues.

8.37. The policy aligns with the NPPF and addresses the need for low-cost, private rented housing. It ensures HMOs meet planning and licensing requirements, protecting the health, safety, and welfare of tenants.

Draft document

## Gypsy and traveller sites

8.38. This policy ensures the provision and safeguarding of sites for Gypsies, Travellers, and Travelling Showpeople, addressing their accommodation needs while integrating sites into the community and landscape.

### Strategic Policy HN09: Gypsy and traveller sites New Sites

Proposals for permanent or transit gypsy, travellers or travelling show people sites (allocated and/or permissible or coming forward as windfall proposals) will need:

- To be located inside or adjoining a settlement boundary, or within 15 minutes travel time by safe, walking, cycling or public transport providing access to a range of services including school and health services
- To have a site size and have a number of pitches that is appropriate, and not over-large, in relationship to the nearest settlement in the settlement hierarchy and its range of services and infrastructure.
- To not exceed 15 pitches as a maximum.
- To be assimilated into the surrounding landscape without significant adverse effect
- To have acceptable vehicular access, on site turning, parking and servicing can be achieved
- To be in locations that are not vulnerable to flooding or affected by any other environmental hazards that may affect the residents' health and welfare
- To have access to essential utilities - water supply, sewerage, drainage, waste disposal. Where service connections are needed these need to be readily available on or close to the site.

Preference will be given to the expansion and intensification of existing sites, subject to maximum site threshold of 15 pitches. If expansion or intensification is impractical, then account will be taken of the cumulative impacts of additional sites on the character of the local area and on the local community



In addition to meeting these requirements, planning applications for gypsy and traveller pitches, or plots for travelling Showpeople, on windfall sites in the countryside outside settlement boundaries must demonstrate:

- the status of the applicant / intended occupant/s meet the national definition for gypsy, traveller or travelling showpeople and the pitch or plot will be occupied by at least one person with a strong local connection to East Devon district;
- there is a proven unmet need for new pitches or plots, having regard to the supply of deliverable pitches or plots and their availability to gypsies and travellers or travelling showpeople who have a strong local connection to the district.

### **Safeguarding Sites**

Existing authorised sites, sites with planning permission, and allocations for Gypsy and Traveller Use or for Travelling Showpeople use will be safeguarded for the number of pitches/plots permitted.

If, in exceptional circumstances (such as long-term vacancy and a demonstrable lack of need), changes of use or redevelopment to non-Gypsy/Traveller or Travelling Showperson's accommodation use are permitted, then, if need exists in the District, suitably located and laid out alternative provision must be provided prior to the loss of the existing site or part of thereof.

### **Justification for inclusion of policy**

- 8.39. The Gypsy and Traveller Accommodation Assessment (2024) identifies a need for around 32 permanent pitches for Gypsies and Travellers and a joint protocol for transit needs. No additional plots are needed for Travelling Showpeople, as existing plots at Clyst St Mary are sufficient.
- 8.40. Fifteen permanent pitches will be provided at the New Settlement in East Devon, with at least 10 delivered during the plan period. Five pitches will be provided east of the M5 and south of the Exeter-Waterloo line. Fifteen pitches will be provided at the Cobdens and Treasbeare Expansion Areas in Cranbrook.
- 8.41. National policy requires the assessment of accommodation needs for Gypsies, Travellers, and Travelling Showpeople, setting pitch and plot targets and working with neighbouring authorities. The 2024 GTAA provides detailed evidence of needs, showing existing pitches mainly in western East Devon. Most immediate needs arise from overcrowding and newly formed families on existing sites.

- 8.42. The GTAA recommends temporary stopping places for transit needs and identifies a need for 20 pitches for households meeting the planning definition, up to 8 pitches for undetermined households, and 4 pitches for households not meeting the planning definition. No additional plots are needed for Travelling Showpeople.
- 8.43. Planning policy requires identifying and updating a supply of deliverable sites for a 5-year period and developable sites for years 6-10. The Cranbrook sites are expected to meet initial requirements. Existing planning permissions and allocations will contribute to supply, ensuring families can remain locally. An additional site east of the M5 will provide at least 5 pitches.
- 8.44. The Council does not anticipate a need for bricks and mortar housing for Gypsies and Travellers, as general housing provision will meet any such needs. Existing Travelling Showpeople sites, including those at Clyst St Mary, are sufficient to meet needs during this plan period.

## **Rural Housing Exception Sites**

- 8.45. This policy supports rural exception site housing proposals to provide affordable housing for local communities, ensuring developments are well-related to settlements and meet proven needs.

### **Policy HN10: Rural Housing Exception Sites**

Rural exception site housing proposals, excluding at towns of 3,000 dwellings or more and outside of settlement boundaries, will be supported but must:

- Be physically well related to the built form of the host settlement. Whilst this does not need to be a settlement with a settlement boundary it must be one that offers a reasonable range of services and facilities.
- Provide affordable housing meeting a proven, unmet need of the local community, noting that such need may be addressed through local plan allocations. Need this can be evidenced by a Housing Needs Survey or other local data such as a Neighbourhood Plan, Parish Survey or Parish Plan. Need is to be based on that existing in the host Parish where the proposal falls but can include need arising from any immediate abutting parish, excluding those that falling in Tiers 1 or 2 of local plan policy.
- Be provided for occupiers that have a local connection with the parish or host settlement or where appropriate adjoining Parishes. If occupiers

meeting the relevant local connection criteria cannot be found then a cascade approach will be agreed, including accommodating need identified by registered providers, East Devon District Council, Community Land Trusts.

For any development allowed under this policy the dwellings must be retained in perpetuity and affordable and there will need to be evidence to demonstrate that secure arrangements will be in place ensuring the housing will remain affordable and available to meet the continuing needs of local people.

A small element of market housing may be included on any development, to provide sufficient cross-subsidy to enable the delivery of affordable homes without grant funding. However, at least 66% of dwellings proposed must be affordable dwellings. Where grant funding is available the market housing percentage should be adjusted downward.

### **Justification for inclusion of policy**

- 8.46. Exception sites deliver affordable housing outside development plans, addressing local needs. This policy is crucial in rural areas with affordability issues, supporting the Council Plan's aim to increase affordable housing and aligning with the East Devon Housing Strategy.
- 8.47. National policy allows a small amount of market housing as a cross-subsidy to enable affordable housing delivery without grant funding. At least 66% of dwellings on exception sites must be affordable, with adjustments if grant funding is available.
- 8.48. The East Devon Local Housing Needs Assessment 2022 provides evidence of the need for affordable housing. Exception sites help meet this need by delivering housing as an exception to other development plan policies.

### **Housing for Rural Workers**

- 8.49. This policy supports housing for rural workers outside settlement boundaries, ensuring it meets the needs of rural businesses while minimizing environmental impacts.

### **Policy – HN11: Housing for rural workers**

Applications for rural workers dwellings outside settlement boundaries will be permitted where:

- It can be demonstrated that the nature and demands of an existing rural business are such that a full-time worker has an essential need to be permanently resident at or near their place of work so they are available at most times;
- The need cannot be met within a nearby settlement, or by existing housing at or near the site or through the conversion of a suitable redundant or disused rural building at the site;
- The size and scale of rural workers dwellings will be commensurate with the needs of the holding and no bigger than 150 sq m (gross internal area) and designed to reflect the location and setting of the proposed site;
- The development will minimise the visual and environmental impact by locating the dwelling close to existing buildings /dwellings, where practical for its purpose; and
- The rural enterprise has been established for at least three years, is currently financially sound based on functional and economic tests, and the business has clear prospects of remaining viable.

The Council will take into account the history of the holding, the recent pattern of land use and building and, recent disposals of land and property when determining a planning application for housing for rural workers.

Where an agricultural, horticultural, forestry or other rural business is not yet established or the need is unproven, then a temporary dwelling such as a mobile home or caravan, may be permitted for a time limited period of up to three years, until the economic viability of the enterprise is established, subject to:

- a. Meeting the criteria of 1b) to 1e) above;
- b. A firm intention and ability to develop the enterprise; and
- c. The business has realistic prospects of meeting functional and economic tests.

Permission for a rural worker dwelling will be subject to an occupancy condition to ensure that it cannot be sold on or sublet for general accommodation unrelated to the enterprise. Removal of such a condition will only be permitted where there is clear evidence that there is no need for the condition to remain in place.

Any permission granted will be tied through legal agreement to the business holding.

Extensions to or replacement of agricultural or forestry or rural business-related dwellings will require a reassessment of need, excluding minor works. Temporary or seasonal accommodation requirements to serve rural enterprises will be considered on a case-by-case basis.

## **Justification for inclusion of policy**

- 8.50. Housing need includes new dwellings for rural workers employed in agriculture, forestry, or similar rural enterprises. This policy supports rural businesses while limiting sporadic development in the countryside. Exceptions are justified where a rural worker must be available at most times for the operation of a rural business.
- 8.51. The policy sets a maximum dwelling size of 150 sq.m, informed by planning precedent in East Devon. This includes internal living space and additional requirements like a boot room or office. Only in exceptional cases will larger dwellings be considered, with evidence required to justify the additional space.
- 8.52. Applicants must provide robust evidence of functional and economic tests, including a business plan and financial assessment. Temporary dwellings may be permitted for up to three years to establish the viability of a new enterprise. Extensions or replacements of rural business-related dwellings will require a reassessment of need.
- 8.53. The policy ensures that rural workers' dwellings are tied to the business holding through legal agreements and occupancy conditions. This prevents the dwellings from being sold or sublet for general accommodation unrelated to the enterprise.

## Chapter 9. Supporting the Economy and Town Centres

- 9.1. Earlier in the plan, we outlined the Economic Vision, Strategy, and Strategic Policy on employment land, addressing strategic priorities, cross-boundary issues, and future employment development. This chapter includes the Strategic Policy on the town centre hierarchy and retail provision.



FIGURE 7 A crowded and vibrant Sidmouth town centre.

- 9.2. Strategic policies are supported by non-strategic policies for development management and employment-related proposals. For this chapter, 'employment use' includes Use Classes B2, B8, E, C1, F1, F2, and Sui Generis.

### Employment development within settlement boundaries

- 9.3. The local plan promotes larger scale development in the West End, while most new development elsewhere will occur within settlement boundaries, focusing on main population centres. This plan includes policies that support employment growth within these boundaries.

#### **Policy SE01: Employment development within settlement boundaries**

Within defined settlement boundaries, as shown on the Policies Map, development for employment uses, including the intensification of existing employment sites, will be permitted where proposals are compatible with



neighbouring developments and land uses and will not give rise to adverse amenity impacts or undermine plan strategy or specific policies directly relevant to the use of the land in question.

On existing employment and business parks, and on land allocated for employment use, uses other the E(g), B2 and B8 (offices, research and development, industrial processes and storage and distribution) will not be permitted unless they can be shown to be subordinate to, directly compatible with and complementary to the overall business use and will enhance job provision and the effective operation and business appeal of the park or site.

### **Justification for inclusion of policy**

- 9.4. The policy is essential to ensure a vibrant and resilient economy in East Devon. It aims to meet the future employment needs of the district by providing a range of employment sites, encouraging inward investment, and supporting local job creation.
- 9.5. The policy addresses the need for employment land within settlement boundaries, supporting self-containment and reflects the settlement hierarchy. It highlights the importance of traditional industrial estates and business parks while also promoting high-value employment opportunities.



**FIGURE 8** Light industrial units

- 9.6. New employment sites should meet a specific need as identified in the EDNA or through identified business interest and contribute to sustainable growth. The policy directs office development to town centres and warehousing to suitable locations, ensuring good access to transport networks. It supports the reuse of previously developed land and allows for some flexibility in changes of use within employment sites, while maintaining a mix of employment opportunities.
- 9.7. The mix of uses within existing employment sites should primarily focus on Use Classes E(g), B2, and B8, with limited other employment uses as appropriate. This ensures a sufficient supply of land and premises to meet evolving business needs.

## **Employment development in the countryside**

- 9.8. The policy supports the intensification and extension of existing employment businesses in the countryside, focusing on reusing or adapting existing buildings to minimize new development.

### **Policy SE02: Employment development in the countryside**

#### **Intensification and extension of existing employment businesses in the countryside**

Building on land within the existing operational site boundaries of a business for intensification or extension of that business and its works and outputs, will be allowed in the countryside where the business:

- Is operating in premises that are at or close to full occupancy, or
- The business has a proven need arising from new or expanding operational functions.

To be acceptable under plan policy the:

- Expansion will need to be proportionate to the existing size and scale of site operations and
- The proposal will need to prioritise reuse or adaptation of existing buildings to reduce the need for additional built development.



Noting these two considerations, extending existing buildings or provision of new buildings will only be acceptable if evidence demonstrates that re-use or adaptation of current buildings is not viable or practical.

### **Re-use of existing rural buildings**

Proposals for small scale employment development through re-use and adaptation of existing redundant rural buildings not currently used or last used for employment, will be permitted where the buildings are:

1. not in agricultural use or likely to be required for agricultural purposes;
2. readily accessible via a range of modes of transport;
3. of sound and permanent construction,
4. capable of adaptation or re-use without major re-building, alteration, or extension; and
5. where compatible with overall plan strategy and other local plan policy considerations.

### **Justification for inclusion of policy**

- 9.9. This policy supports employment growth on existing rural sites while protecting the countryside's character. It balances economic development with environmental sensitivity, ensuring expansions are proportionate and prioritize the reuse of existing structures.

### **Policy SE03: Farm Diversification**

Farm diversification will be supported through allowing for the introduction of new employment uses onto established farm holdings (those that have operated for at least 10 years) where the development is subordinate to and supports the long-term financial viability of the farm. Criteria on what should be considered in the viability statement will be published and available online via the Council's website.

Proposals for farm diversification will need to meet all of the following:

- The proposal is compatible with, and an ancillary and subordinate component of, an existing and active farm enterprise and contributes to the continuing viability of the farm as a whole,

retaining existing or providing new employment opportunities and services for the local community;

- Development, in terms of its scale, nature, location and layout, does not detract from or prejudice the existing agricultural undertaking or its future operation;
- Any existing suitable buildings are re-used or adapted and, where appropriate, redundant buildings which are derelict or offer no opportunity for beneficial use are removed;
- Any new building (and parking and other structures/storage) is modest in scale and sited in or adjacent to an existing group of buildings;

### **Justification for inclusion of policy**

- 9.10. This policy is crucial for supporting rural communities by allowing employment growth on existing sites while protecting the countryside's character. It aims to balance economic development with environmental sensitivity, ensuring that expansions are proportionate and prioritize the reuse of existing structures.
- 9.11. This policy will be used to guide decisions on rural diversifications, ensuring they are appropriate in scale and do not harm local amenities. The policy also supports the reuse of redundant rural buildings for small-scale employment, provided they are structurally sound and accessible.
- 9.12. The policy excludes business parks and industrial estates in rural areas, focusing instead on individual businesses. It emphasizes the importance of maintaining the rural character and minimizing environmental impacts.
- 9.13. Agriculture underpins the District's rural economy and supports many ancillary businesses. It remains a significant sector for East Devon, providing direct jobs and underpinning other economic activities. The Council recognizes the importance of agriculture and the need for new employment in rural areas, making diversification crucial for the economic viability of farm holdings.
- 9.14. Diversification involves adding non-agricultural business activities within the holding to develop new income sources. This supports farm income, adds stability, and optimizes assets. Farmers are increasingly adopting entrepreneurial strategies to face economic pressures and policy changes, moving towards grants and tackling climate change.

- 9.15. The policy focuses on development appropriate to the existing business and rural character. It prioritizes using available buildings on a holding, with new buildings integrated with the existing environment. Diversification proposals should contribute to the farm business and rural economy, avoiding conflicts with existing operations.
- 9.16. Proposals should align with the future business plan for the holding, ensuring continued viability. Applications should be supported by information by a business plan and long-term viability statement produced in accordance with guidance on the Council's website. New uses must be appropriate, considering their impact on the surrounding area and relationship to agricultural operations. Diversification can include adding value to farm products, tourism, renewable energy, and other innovative activities.
- 9.17. Exceptionally, residential conversion may be part of a farm diversification project, considering the flexibility already provided by Permitted Development Use Class Q.

## **Resisting the loss of Employment sites**

- 9.18. This policy aims to resist the loss of employment sites to other uses, ensuring that land designated for employment remains available to support economic growth and local job opportunities.

### **Policy SE04: Resisting the loss of Employment sites**

Loss of employment sites, either in whole or in part, to other uses will not usually be permitted. Employment sites are considered to be those currently in employment use, last used for employment and those which are allocated, permitted or conditioned for employment development.

1. Exceptionally, those sites in B2 and B8 uses will only be permitted for other types of employment use, if it can be demonstrated that:
  - a. The alternative use is in accordance with or does not undermine the plan's overall Spatial Strategy; and
  - b. Development relates to ancillary services of an appropriate size which will support an employment area (not within a town centre) by making it more sustainable and viable; or

- c. Development results in mixed use regeneration within a settlement boundary designed to maintain or increase net job opportunities through alternative employment uses; or
  - d. The site is no longer viable for the current type of employment use but is viable for an alternative type of employment use, evidenced by a compliant viability statement; or
  - e. There is a lack of demand for the current type of employment use at the site, evidenced by a compliant marketing statement showing that the site has been appropriately marketed; and that a suitable supply of available (actively marketed) comparable employment sites/land can be demonstrated within the local area, evidenced by a compliant supply statement.
2. Exceptionally, the use of any employment sites for non-employment uses will be permitted if it can be demonstrated that:
- a. The alternative use is in accordance with or does not undermine the plan's overall Spatial Strategy; and
  - b. The site is no longer viable for any employment use, evidenced by a compliant viability statement.

Compliant viability, marketing and supply statements must adhere to the respective requirements set out in the relevant guidance published and available online via the Council's website.

If an alternative use is acceptable, then applicants will be required to demonstrate that they have endeavoured to incorporate an appropriate (in terms of scale and type) element of employment floor space as part of the new development.

## **Justification for inclusion of policy**

- 9.19. This policy is essential to maintain a sufficient supply of employment land in East Devon, supporting economic growth and local job opportunities. It aims to protect existing and proposed employment sites from being converted to other uses, ensuring they remain available, suitable, and achievable over the plan period.

- 9.20. This policy will be used to guide decisions on the retention of employment sites, ensuring that any proposed changes align with the overall Spatial Strategy and do not undermine the plan's objectives. The policy allows for exceptions where alternative employment uses or mixed-use regeneration can be justified, provided they support the sustainability and viability of employment areas.
- 9.21. The policy emphasizes the importance of retaining employment land within settlements to support local communities and reduce the need to travel. It also recognizes that some ancillary uses may complement and support employment areas.
- 9.22. As the economy evolves, not all employment areas will remain viable for their current uses. The policy allows for alternative uses if there is no realistic prospect of continued employment use, supported by robust evidence of viability and market demand. If an alternative use is appropriate, incorporating an element of employment provision should be considered.
- 9.23. This policy aligns with the NPPF, supporting sustainable and inclusive economic growth, and providing flexibility to respond to changing economic circumstances.

## **Employment and Skills Statements**

- 9.24. This policy requires major developments to complete an Employment and Skills table and provide an Employment and Skills Statement for developments over 100 homes or 5,000 square metres. These documents aim to maximize local employment and skills opportunities.

### **Policy SE05: Employment and Skills Statements**

All major developments will be required to submit a basic Employment and Skills plan. Any developments over 100 homes or on employment sites of 5,000 square metres or greater will also need to provide an Employment and Skills Statement which commits to maximising the provision of skills and employment opportunities, to benefit the local population as well as the employer. These documents should be submitted with the planning application for development and will be implemented through a planning obligation or condition.

Compliant Employment and Skills Statements must adhere to the respective requirements set out in the relevant guidance published and available online via the Council's website.

## **Justification for inclusion of policy**

- 9.25. This policy is crucial for leveraging development projects to enhance employment and skills within East Devon. It ensures that major developments contribute to local job creation and skills improvement, benefiting both the local population and employers.
- 9.26. This policy will be used to ensure that Employment and Skills Plans and Statements are submitted with planning applications where required. These statements should outline commitments to local employment and skills provision and will be implemented through planning obligations or conditions. Guidance on these plans and statements will be made available on the Council's website.
- 9.27. The policy supports inclusive economic growth by raising skill levels in the district, aligning with broader initiatives like the Levelling Up White Paper. It emphasizes the importance of STEM (Science, Technology, Engineering and Mathematics) education, technical qualifications, and employer investment in workforce development.
- 9.28. Larger developments must commit to Employment and Skills Statements covering all development phases, secured through planning conditions or legal agreements. The Council will work with applicants to ensure these commitments are relevant, measurable, and monitored effectively.
- 9.29. The policy uses benchmarks from the National Skills Academy's Client Based Approach to guide negotiations with developers, ensuring that employment and skills commitments are proportionate and achievable.

## **Strategic Policy SE06: Town centre hierarchy, sequential approach and impact assessment**

- 9.30. This policy establishes the relevance of the hierarchy of town centres in East Devon, prioritising tier one and two centres for main town centre uses. Proposals must align with the scale, design, and function of the centre and comply with other plan policies.

## Strategic Policy SE06: Town centre hierarchy

Tier one and two town's form focal points of activity in East Devon towns and will be the preferred location for the development of new retail, leisure and other uses that attract and are used by people for commercial or community activities.

In these town centres new development proposals should be appropriate in terms of their scale and design to the centre in which they are proposed, as well as to the role and function of that centre.

In tier three and four settlements (without a defined Town Centre Area) new smaller scale retail and commercial developments should be located within central parts of the settlement and readily accessible to pedestrians.

Outside of town centre areas development proposals for retail uses, or other leisure, commercial or communal uses, that attract substantial visitor or user numbers will not be permitted unless they are on land specifically allocated for that use in this plan or are explicitly provided for under other plan policy.

### Justification for inclusion of policy

9.31. East Devon's town and village centres are community hubs offering retail, leisure, entertainment, sport, recreation, offices, cultural spaces, and tourism. Their vitality supports local communities, and the NPPF promotes competitive town centre environments and growth management. This strategic policy defines the network and hierarchy of centres, ensuring resilience to future economic changes, based on the Council's Role and Functions of Settlements Study.

9.32. The hierarchy includes:

- **Tier one:** Exmouth
- **Tier two:** Axminster, Cranbrook, Honiton, Ottery St Mary, Seaton, Sidmouth
- **Tier three:** Broadclyst, Budleigh Salterton, Colyton, Lypstone, Woodbury
- **Tier four:** Clyst St Mary, Uplyme, Beer, West Hill, Newton Poppleford, Feniton, Whimple, Kilminster, Otterton, East Budleigh, Stoke Canon, Tipton St John, Musbury, Sidbury, Chardstock, Broadhembury, Payhembury, Branscombe, Plymtree, Dunkeswell, Hawkchurch, Exton, Westclyst



- 9.33. Encouraging new shops and retaining existing ones, especially in rural areas, is crucial. This reduces travel, congestion, emissions, and improves health. The sequential test ensures development is appropriately located, prioritising town centres, then edge-of-centre, and finally out-of-centre sites, provided they are accessible and do not harm nearby centres.

## **Town Centre Development**

- 9.34. This policy supports the development of town centres in East Devon, enhancing their role as sustainable shopping and leisure destinations. It aims to improve the quality and range of facilities while maintaining the character and amenity of the centres.

### **Policy SE07: Town Centre development, sequential approach and impact assessment**

Town Centre Areas and Primary Shopping Areas are defined for the tier one and two towns and the settlements of Budleigh Salterton, Beer and Colyton.

Proposals for development within the town centre areas (and excepting Cranbrook which is subject to the policies of the Cranbrook Plan), as defined on the Policies Map, will be permitted where they improve the quality and/or broaden the range of retail and leisure facilities, enhance the role of the town centres as sustainable shopping and leisure destinations and strengthen their vitality and viability. Proposals must not undermine the shopping character or visual amenity of the town centre, either alone or cumulatively, or adversely affect the amenity of the surrounding area through noise, smell, litter, traffic or disturbance arising from operating hours. Development proposals should make a positive contribution to the townscape of the centre in which it is proposed, incorporate provision for cycle access and cycle parking and enhance the natural environment wherever possible.

The Primary Shopping Areas as defined on the Policies Map will be the focus for retail and appropriate leisure uses. Development proposals for other town centre uses within the Primary Shopping Areas will only be permitted where the majority of the total ground floor units are facilitating retail or leisure uses. Unless it can be demonstrated that there is no longer a retail or leisure demand, other town centre uses will not be permitted on the ground floor within the Primary Shopping Areas. Unless it can be demonstrated that



there is no demand for any town centre use residential uses will not be permitted on the ground floor within the Primary Shopping Areas. Evidence of demand should be outlined in a marketing statement. Criteria on what will be considered an adequate marketing statement is available online via the Council's website.

Where the change of use of a shop is permitted within the town centre and the shopfront, entrance or other features are considered to be of architectural or historic merit they should be retained and incorporated into the new development scheme.

Throughout the Town Centre Areas appropriately designed development proposals for residential or community use of upper floors will be encouraged. Such use should be independently accessed, have provision for refuse storage and should not result in adverse impacts on any retail use of the building.

#### **Sequential approach and impact assessment**

Outside of town centre areas development proposals for retail uses, or other leisure, commercial or communal uses, that attract substantial visitor or user numbers will not be permitted unless they are on land specifically allocated for that use in this plan or are explicitly provided for under other plan policy - unless:

- a. Through sequential testing it can be demonstrated that a site within a Town Centre Area, or failing that on the edge or physically well related to a Town Centre Area, or failing that on an Edge-of-centre<sup>7</sup> site as defined in the NPPF is not available; and
- b. For retail proposals with a floorspace of greater than 500sq.m, and other town centre use proposals greater than 2,500sq.m, an impact assessment has been undertaken, which shows that the proposal will not have a significant adverse impact either alone or cumulatively.

<sup>7</sup> Edge-of-centre locations are defined for retail purposes, as locations that are well connected and within 300 metres of the Primary Shopping Area. For all other main town centres uses, it is a location within 300 metres of a town centre boundary, however for office development this includes locations outside of the town centre but within 500 metres of a public transport interchange. Local circumstances should be taken into account when determining whether a site falls within the definition of edge-of-centre.

Neighbourhood Plans may set different thresholds where local considerations, supported by evidence, indicate this is appropriate.

Retail development will not be permitted on sites allocated for other uses if equally suitable alternative provision can be accommodated in the immediate locality.

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Any out-of-centre sites, which satisfy the sequential test, must be accessible by public transport, bicycle and foot and well-connected to the centre by these modes. In order to ensure that land is retained for the benefit of the local economy, permitted development rights allowing changes to alternative uses will be withdrawn.

## Justification for inclusion of policy

- 9.35. East Devon's town centres are compact, focusing on convenience and service provision, with many independent shops and supermarkets. Regular markets and events add vibrancy. Smaller settlements like Budleigh Salterton, Beer, and Colyton also have a range of shops and uses, making this policy applicable to them.
- 9.36. The policy defines Town Centre Areas and Primary Shopping Areas for tier one and two towns, and Budleigh Salterton, Beer, and Colyton. Development proposals in these areas should enhance retail and leisure facilities, strengthen vitality and viability, and not undermine the shopping character or visual amenity. Proposals should contribute positively to the townscape, include cycle access and parking, and enhance the natural environment.
- 9.37. Primary Shopping Areas will focus on retail and appropriate leisure uses. Other town centre uses will be permitted only if the majority of ground floor units remain retail or leisure. Residential uses on the ground floor are not permitted unless there is no demand for any town centre use, evidenced by a marketing statement.
- 9.38. Architecturally or historically significant shopfronts should be retained in new developments. Upper floors in Town Centre Areas are encouraged for residential or community use, provided they are independently accessed and do not impact retail use.
- 9.39. The policy aligns with the NPPF, supporting town centres as community hubs and defining acceptable uses. It ensures retail concentration in Primary Shopping Areas to maintain High Street vitality. Town Centre Areas

and Primary Shopping Areas share the same boundaries on the Policies Map.

- 9.40. Historic town centres contain listed buildings and conservation areas, requiring sensitive design to protect and enhance their character. This creates attractive centres that encourage regular use and retain local spending.
- 9.41. Town centres offer a mix of uses and benefit from public transport. The Local Plan provides a strategy for their development and monitors their health to support vitality and viability. Masterplans for Exmouth and Cranbrook aim to enhance their retail and leisure offer.
- 9.42. Town centre and edge-of-centre sites are suitable for specialist housing, including for older people, due to their proximity to transport and services.
- 9.43. The policy seeks to retain retail units in town centres despite competition from online retailing and changes in use allowed by the General Permitted Development Order (GPDO). It applies to proposals outside the permitted development regime to ensure town centres remain attractive destinations.
- 9.44. The NPPF requires local plans to set thresholds for retail impact assessments. East Devon has set a 500 square metre threshold for retail and 2,500 square metres for other developments. These assessments should be proportionate and agreed upon early in the planning process.

## **Local shops and services**

- 9.45. This policy supports the development of new shops and services within tier 1-4 settlements, villages, and neighbourhood centres, ensuring they enhance the local retail or service role and are accessible by walking and cycling. It also aims to resist the loss of existing local shops and services unless they are no longer viable.

## **Policy SE08: Local shops and services**

### **Provision of new shops or services**

Outside of town centres and within village and neighbourhood centres proposals for shopping and service development (including Public Houses and Post Offices) will be supported within tier 1-4 settlements, provided it enhances their retail or service role and is accessible by walking and by bicycle and will not result in excessive traffic generation. New shops should

sell predominantly convenience goods, be of a scale to serve the local area without, alone or cumulatively, impacting on the vitality or viability of any nearby centre<sup>8</sup>.

As a guide, shops in these locations should not exceed 280sqm, mostly sell essential goods, including food and be at least 1km from another similar shop.

### **Loss of existing local shops or services**

Development proposals that would result in the loss of existing local shops and services will be resisted where it would result in the significant or absolute loss of that facility to the community unless through a viability statement it is evidenced that it is no longer viable for the shop or service to be sustained, including under community acquisition/operation or within, or as part of, a different use.

Permission to change the use of a shop will be subject to the retention of the shopfront.

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<sup>8</sup> As a guide to the scale and location of shops in the smaller settlements, Use Class F.2 (of the 1st September 2020 General Permitted Development Order) relates to shops not more than 280sqm mostly selling essential goods, including food and at least 1km from another similar shop.

## Justification for inclusion of policy

- 9.46. Throughout East Devon, small groups of shops and services are vital for meeting the basic, everyday needs of communities. These range from comprehensive offers in town and village centres to neighbourhood and village shops. The diversity of provision makes it impractical to define all local centres on the Policies Map, but these areas typically supply a range of everyday goods and services. There is potential for improving local centres and providing new shops, post offices, and services in areas lacking retail facilities. Opening hours in residential areas may be restricted to safeguard local amenity.
- 9.47. Existing shops and services are crucial for day-to-day convenience shopping, especially for the elderly and less mobile. Village public houses and post offices reduce reliance on private cars, particularly where public transport is limited. The Council will resist the loss of local shops and services where it would significantly impact the community.
- 9.48. Reinstating shops after they have changed to other uses is challenging. Proposals involving the loss of local shops or services will only be permitted if the existing use is no longer viable and there is no market for the business. The Council will seek marketing and financial information to demonstrate this and will aim to retain the shopfront for potential future use.
- 9.49. Recognising the community role of shops and services is essential for creating sustainable places. This policy aligns with NPPF guidance on retaining and developing accessible local services and community facilities. It takes a cautious approach to the loss of important shops and services, ensuring community needs are met while allowing for change of use when viability can no longer be demonstrated. Proposals must provide evidence of non-viability through marketing information and viability studies.

## Rural shops outside of towns and villages

- 9.50. This policy supports retail development in rural areas outside villages, provided it directly relates to an existing rural business and meets specific criteria to protect town centres and local shops.

### Policy SE09: Rural shops outside of towns and villages

In order to support local rural businesses whilst protecting the viability of town centres and shops available to the local community, retail development in rural areas, outside villages, including extensions or additional facilities,

will be permitted only where they directly relate to an existing rural business, subject to:

- a. a minimum of 60% of the produce/products for sale being produced on the premises or holding, and
- b. at least half of the remaining produce/products for sale being sourced and produced from within East Devon, and
- c. the remainder of the produce/products for sale being sourced and produced from within Devon, Cornwall, Dorset and Somerset.

and provided that:

1. The scale and type of retail shop proposed will not adversely affect easily accessible convenience shopping available to the local community (and a retail impact assessment may be required to ensure that existing town centres and local shops are not adversely affected to an unacceptable degree); and
2. The proposal does not harm the rural character of the surrounding natural or historic environment, or the amenities of the locality; and
3. The local road network and access to the site can safely accommodate the extra traffic generated by the proposal; and
4. The car parking will be proportionate to the scale of the development and the layout and siting will be sympathetic to the surroundings.

## **Justification for inclusion of policy**

- 9.51. Rural businesses are those that rely on the land and natural assets of the countryside to derive an income. They are not, for the purposes of this policy, businesses that are simply located in a rural area.
- 9.52. Rural shops, including farm shops and plant nurseries, are defined as those where the majority of goods sold are produced on the premises or associated land. This ensures a strong link to the land use, preventing them from becoming general retail outlets. Farm shops provide valuable local facilities and additional income for farms, supporting the rural economy without competing with town and village centres.
- 9.53. To prevent rural shops from becoming large commercial enterprises, the policy restricts the size and type of goods sold. Additional services, such as cafes, are only permitted if ancillary to the sale of goods produced on the

property. This control ensures rural shops do not harm the high-quality East Devon landscape or generate excessive traffic.

- 9.54. The policy promotes retail development in rural areas where products are locally sourced or manufactured, supporting agricultural diversification and local food production. It restricts the scale of development and the origin of goods to protect the vitality and viability of town centres, ensuring they remain the focus for retail, services, leisure, and public amenities.
- 9.55. Proposals for new or expanded rural shops must not adversely affect local convenience shopping, the rural character, or local amenities. They must also ensure safe access and proportionate car parking. The policy aligns with the NPPF, promoting sustainable rural retail development while protecting town centres.

## **Sustainable Tourism**

- 9.56. This policy aims to secure a high-quality, sustainable tourism experience in East Devon, benefiting local communities and businesses while conserving the district's natural beauty, wildlife, and cultural heritage..

### **Policy SE10: Sustainable Tourism**

The provision of visitor accommodation, facilities and attractions within settlement boundaries will be supported and encouraged where they are of an appropriate scale for the locality and minimise reliance on the private car.

#### **Tourism development in the countryside**

Any proposal for new tourist attractions, facilities or temporary accommodation in the open countryside should be to meet an identified and evidenced demand and meet the following criteria in full:

- a. re-use or adapt any existing suitable buildings and, where appropriate, remove any redundant buildings which are derelict or offer no opportunity for beneficial use. If existing buildings cannot be reused or adapted then this should be fully justified;
- b. where new buildings are justified they must be of an appropriate scale, siting and appearance and activities must be of an appropriate intensity for the character of the area and not adversely impact local amenity to a significant degree;



- c. not result in significant adverse impacts from vehicle movements or parking and, where it is likely to create significant vehicular movements to and from the site, development should be well located in relation to sustainable tier 1-4 settlements and local public transport provision;
- d. be closely associated with other attractions/established tourism uses, including the public rights of way network;
- e. be located very close to the main dwelling from which it will be serviced/managed (e.g. as part of a farm diversification scheme) to avoid the need for a permanent new managers dwelling or multiple daily car journeys to manage the site.

New buildings to provide overnight visitor accommodation in the open countryside will not be permitted. Temporary structures such as yurts, glamping pods, towing caravans and tents may be acceptable in appropriate locations but should be capable of being completely removed from the site when not required/out of season.

### **Loss of Existing Visitor Accommodation**

The loss of any visitor accommodation to other uses will only be permitted in exceptional circumstances. For example, converting holiday accommodation into low-cost staff accommodation (rented residential accommodation for local workforce), which will address recruitment challenges for the tourism sector.

### **Proposals for new Tourist Attractions/Facilities or Accommodation**

Proposals for new permanent and temporary visitor accommodation and attractions will need to demonstrate a commitment to:

- a. Developing facilities of high quality;
- b. Working towards Net Zero; and
- c. Improving accessibility provision (accessible in terms of providing suitable access to those with physical and non-physical impairments/disability) and



d. Positively contribute to the natural beauty, wildlife and cultural heritage of the District

In order to provide such evidence, applicants will be required to submit a Sustainable Tourism Statement outlining their commitment to the above criteria.

In this Policy "visitor accommodation" means serviced tourist accommodation (Class C1 use) and un-serviced tourist accommodation, as well as essential ancillary staff buildings to support the provision of tourism services.

Below Fig: Beer Village Centre



## **Justification for Policy**

- 9.57. Tourism is vital to East Devon's economy, attracting visitors with its unique environment and offering diverse accommodation options. The policy supports sustainable tourism growth, ensuring proposals benefit local communities and businesses while conserving the natural environment.
- 9.58. Visitor accommodation ranges from hotels and B&Bs to holiday lets, glamping, and caravan sites. The Council supports sustainable attractions and activities that avoid negative impacts like increased traffic and environmental degradation. Proposals should retain and utilise existing buildings where possible, with new buildings requiring justification and sensitivity to the site.
- 9.59. The Council will resist the loss of permanent visitor accommodation unless it is financially unviable, requiring evidence through marketing requirements. Redevelopment should prioritise more suitable tourist or community uses, especially in areas like the Coastal Preservation Area.
- 9.60. The policy promotes 'green tourism,' encouraging proposals that enhance visitors' understanding and enjoyment of East Devon's natural environment. It aims to balance accommodation provision with protecting the rural character, favouring conversions of existing buildings and temporary structures over new permanent buildings.
- 9.61. Tourism development should be located sustainably within tier 1-4 settlements to minimise car use. Some activities may require rural locations, which should be planned to positively contribute to the natural environment. Sustainable travel options, like bicycle hire, should be included to align with the Council's net-zero targets.

## **Holiday Accommodation Parks in designated landscapes**

- 9.62. This policy restricts new holiday accommodation parks in East Devon's most sensitive landscapes, allowing only extensions or ancillary facilities on existing sites under specific conditions to protect the environment and local communities.

## **Policy – SE11: Holiday Accommodation Parks in designated landscapes**

Within the District’s most sensitive landscape areas, including National Landscapes , Coastal Preservation Areas and Green Wedges, new caravan, chalet or other holiday parks will not be permitted.

Proposals for the extension of, or related and ancillary facilities on, existing sites will be permitted provided they meet the following criteria in full:

1. No additional permanent pitches or accommodation are to be provided, although upgraded accommodation of a similar size and height will be allowed on the footprint of existing permanent accommodation where this will result in an environmental improvement.
2. The proposal relates sensitively in scale and siting to the surroundings and includes extensive landscaping and visual screening to mitigate against adverse impacts.
3. The proposal would not have an adverse impact on local character or the amenities of adjoining residents.
4. The proposal would not use the best and most versatile agricultural land.
5. The proposal will be provided with adequate services and utilities
6. Traffic generated by the proposal can be accommodated safely on the local highway network and safe highway access to the site can be achieved.
7. The proposal will be subject to the provisions of plan policy in terms of sustainable construction, on site renewable energy production and biodiversity net gain.
8. Any structures beyond the existing boundary of the site are temporary and any visual or other harm can be satisfactorily mitigated.

## Justification for Policy

- 9.63. The majority of East Devon lies within designated landscapes. Holiday accommodation parks, including static caravans, chalets, and lodges, are key to the tourism sector and can positively impact the local economy. However, their development must not harm the natural environment or local communities. This policy ensures applications for such developments are carefully managed, particularly given the large scale, range of facilities, lengthy operational hours, and prominent coastal locations of many existing parks.
- 9.64. Outside designated landscapes, new or expanded holiday parks are acceptable in principle under the Sustainable Tourism policy. Within designated landscapes, no new holiday parks will be permitted. Existing parks are encouraged to upgrade and improve their facilities to reduce visual, environmental, and amenity impacts. Extensions and intensification of existing sites are only allowed for non-permanent ancillary facilities, provided adverse impacts are mitigated.
- 9.65. This policy balances the economic benefits of holiday accommodation parks with the need to protect East Devon's sensitive landscapes. It ensures that any development is appropriately scaled, sensitively sited, and includes extensive landscaping and visual screening. Proposals must not adversely affect local character, amenities, or agricultural land and must provide adequate services and safe access.

## Chapter 10. High Quality Design

- 10.1. The design of spaces and buildings significantly impacts how we experience places and the natural environment. Good design influences health, safety, inclusion, travel choices, cost of living, and quality of life. It also affects the environment through construction methods, local context integration, and addressing climate emergency demands.
- 10.2. The National Planning Policy Framework (NPPF) emphasises that creating high-quality places and buildings is essential in planning and development. Good design is a key aspect of sustainable development and helps make development acceptable to communities. Local Plan policy ensures well-designed proposals align with the NPPF and national design guidance.
- 10.3. The Local Plan includes site allocations to meet national housing targets. The design of these allocations is crucial to preserving valuable landscapes, especially in sensitive sites like National Landscapes or heritage assets. Design codes will guide future proposals, ensuring new development is resilient and well-integrated into the environment.
- 10.4. Good design extends beyond aesthetics to include sustainability and energy efficiency. Every development is an opportunity for good design, with this chapter including policies addressing:
  - Climate change resilience
  - Healthy and active lifestyles
  - Green infrastructure





FIGURE 9 Considered green infrastructure is vital to create healthy places.

- 10.5. New development should provide a high standard of amenity for users. The quality of a home impacts health outcomes, and suitable size and layout are key. The Government's nationally described space standard (NDSS) sets minimum standards for new dwellings. Local planning authorities may adopt the NDSS through local plan policies, subject to evidence of need and viability.
- 10.6. Recent evidence shows only 29% of new dwellings in East Devon meet the NDSS for gross internal floor area, with even fewer meeting other NDSS requirements. This may result in inadequate space for daily activities. The impact of adopting the NDSS will be assessed in the viability study accompanying the East Devon Local Plan 2020-40 to ensure the Plan's deliverability.

## Design and Local Distinctiveness

- 10.7. This policy ensures new development and refurbishment of existing buildings are of high-quality design and locally distinctive, aligning with local and national design guidance.

## Policy – DS01: Design and Local Distinctiveness

New development, including the refurbishment of existing buildings should be of a high quality design and locally distinctive. Proposals should clearly respond to local policy and guidance including Neighbourhood Plans and Design Guides / Briefs / Codes, whether adopted as Supplementary Planning Documents or promoted through other means. For proposals in the Blackdown Hills National Landscape, reference should be made to the [Blackdown Hills AONB Design Guide For Houses](#); within the East Devon National Landscape, reference should be made [to East Devon AONB Planning Guidance](#). Proposals should also be in accordance with the principles of the National Design Code and Building for a Healthy Life, and any other local design guidance.

The layout and design of building curtilages, roads, parking, pavings, open space, site furniture footpaths and boundary treatments should make a positive contribution to the street scene / public realm and the integration of the development with its surroundings and setting. Recycling and waste storage facilities should be in locations well related to collection points. Particular care will need to be given to boundary treatments that abut public or communal areas in order to avoid adverse impacts.

### Proposals will only be permitted where they:

1. Respect the key characteristics and special qualities of the area in which the development is proposed;
2. Ensure the appearance of buildings, including scale, massing, density, height, fenestration, and materials, relate well to their context;
3. Do not adversely affect:
  - a. The distinctive rural, historic or architectural character of the area;
  - b. The urban form, in terms of significant street patterns, groups of buildings and open spaces;
  - c. The amenity of occupiers of adjoining residential properties;
  - d. The operation of existing uses outside of the proposed development;

- e. The future amenity of occupants of proposed residential properties, with respect to access to open space; protection from noise and pollution; provision of adequate internal light; storage space for bins, bicycles, prams, and other uses; and
  - f. Meet nationally and locally described space standards<sup>1</sup>.
- 4. Have due regard for important aspects of detail and quality and should incorporate:
  - a. Attractive, secure layouts with safe and convenient access for the whole community, including disabled users and incorporating appropriate measures to reduce the potential for crime;
  - b. Necessary and appropriate street lighting and furniture and, subject to negotiation with developers, public art integral to the design;
  - c. Features that maintain good levels of daylight and sunlight into and between buildings to minimise the need for powered lighting where this does not conflict with shade and tree planting requirements;
  - d. Appropriate soft landscape (greening) measures and open space provision to enhance amenity and biodiversity value.
- 5. Measures that minimise risks associated with climate change, including a fabric first approach, the use of appropriate materials, techniques, and technologies to reduce carbon emissions over the lifetime of the development
- 6. Mitigate potential adverse impacts, such as noise, smell, dust, arising from developments, both during and after construction.
- 7. Include measures to secure the management of waste in accordance with the waste hierarchy (reduce, reuse, recycle, recovery, disposal) during the construction and operational phases.
- 8. Take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.

On any development scheme there is potential for the creation of inert material during any demolition and construction or ground movement or



remodelling. Principles of waste reduction and reuse should be considered in the layout, design and levels of any development on all the sites. In development proposals the potential for on-site reuse of inert material will be required to be addressed in development proposal, as this will reduce the generation of waste and subsequent need to export waste off-site for management.

<sup>1</sup> Technical Housing Standards - [www.gov.uk](http://www.gov.uk)

## **Justification for inclusion of policy**

- 10.8. Paragraphs 131 to 141 of the NPPF mandate planning authorities to create policies for high-quality, beautiful, and sustainable places and buildings. Paragraph 132 highlights the need for clear design visions and expectations to provide applicants with certainty. The NPPF advises local planning authorities to prepare design guides or codes consistent with the National Design Guide and National Model Design Code, reflecting local character and preferences.
- 10.9. This Council will prepare a District Design Guide to help inform the application of Policy DS01.

## **Housing Density and Efficient Use of Land**

- 10.10. This policy ensures residential development optimises site density while conserving or enhancing the area's character and making efficient use of land. Major developments and those in sensitive locations require a design code specifying density recommendations.

## **Policy – DS02:- Housing Density and Efficient Use of Land**

Proposals for residential development should optimise the density of the site in a manner that conserves or enhances the character of the area and makes efficient use of land.

Proposals for major development schemes and those in environmentally or heritage sensitive locations will be required to be supported by a design code agreed with or produced by the council as planning authority. Codes, amongst other matters, will specify density recommendations for key allocations,

## Justification for inclusion of policy

10.11. Paragraphs 123 to 130 of the NPPF focus on making effective use of land and achieving appropriate densities. To meet sustainability goals, it is essential to use land efficiently and build at the highest density compatible with the surrounding area's character. The NPPF (paragraph 129) advocates for minimum density standards in town centres and areas well-served by public transport to significantly increase average residential density. It also suggests setting a range of densities based on the accessibility of different areas.

## Advertisements

10.12. This policy ensures that advertisements are appropriately positioned, safe, sympathetic to the area's character, and designed with compatible colours and materials. Illuminated advertisements should reflect the area's general lighting level.

### Policy – DS03: Display of Advertisements

Applications for the display of advertisements will be considered in terms of amenity and public safety, taking account of cumulative impacts.

Advertisements should be:

1. Appropriately positioned and scaled in relation to their context;
2. Safe in terms of highway safety;
3. Sympathetic to the character of the area;
4. Designed with colours and materials compatible with the building and area; and
5. Where illuminated, the type and level of illumination should reflect the general level of lighting in the area.

## Justification for inclusion of policy

10.13. The display of advertisements is controlled similarly to planning permission but under a separate legal system. This policy guides decision-makers on handling advertisement consent applications.

10.14. The NPPF states that poorly sited and designed advertisements can undermine an area's character. Control should focus on amenity and public

safety, considering cumulative impacts (paragraph 141). This policy seeks to address these issues.

## **Incorporating green infrastructure in the design and development**

10.15. This policy ensures that development in East Devon delivers high-quality, multi-functional Green and Blue Infrastructure in line with Natural England's Green Infrastructure Framework.

### **Policy – DS04: Green & Blue Infrastructure**

Development in East Devon will deliver high quality multi-functional Green and Blue Infrastructure in accordance with Natural England's Green Infrastructure Framework.

All major development proposals must:

- Demonstrably meet the 5 Natural England Green Infrastructure Principles and follow the guidance set out in the Green Infrastructure Design Guide.
- Provide a robust Green and Blue Infrastructure Plan which clearly demonstrates how it accords with Natural England's GI Framework and will contribute to nature recovery and restoration of wildlife rich habitats; is integrated with and connects to the surrounding landscape, and provides multi-functional Green Infrastructure which incorporates and enhances natural ecosystems functions including landscape and water quality, biodiversity, food production (including orchards and allotments), increased canopy cover, sustainable drainage and climate change mitigation/adaptation.
- Enhance and promote the health and wellbeing of residents through the provision of high quality publicly accessible natural green/blue space and connected cycling/walking infrastructure
- Enhance existing habitats and provide new wildlife spaces and corridors that enhance biodiversity and provide green links, open space and biodiversity enhancement areas.

- Maximise beneficial outcomes for residents and visitors to encourage use of the GI network and to enrich the cultural identity of the area.
- Contribute to the achievement of excellent ecological status of rivers and watercourses, through enhanced natural flood storage, capture of run-off and restoration of soil health.
- Clearly demonstrate how proposed Green and Blue Infrastructure will be managed and maintained.

## Justification for inclusion of policy

- 10.16. 'Good Good quality Green Infrastructure (GI) plays a crucial role in improving health, wellbeing, air quality, nature recovery, and climate resilience, while addressing social inequality and environmental decline. GI is a network of multi-functional green and blue spaces and natural features that provide a wide range of benefits for nature, climate, communities, and prosperity.
- 10.17. Development proposals in East Devon should align with the five Benefit Principles of Natural England's Green Infrastructure Principles Wheel:
- Nature Rich Beautiful Places
  - Active and Healthy Places
  - Thriving and Prosperous Places
  - Improved Water Management
  - Resilient and Climate Positive Places
- 10.18. GI should be multifunctional, accessible, connected to its landscape and nature networks, and responsive to local character. It provides opportunities to link with Biodiversity Net Gain, Local Nature Recovery Strategies, Nature Recovery Network, and Natural Capital. GI provision can fully count towards Biodiversity Net Gain delivery.

# Chapter 11. Sustainable Transport and Communications

## Introduction

11.1. East Devon is a largely rural district with low levels of walking, cycling, and public transport, and higher car ownership than the national average. While some villages and hamlets rely on car travel, larger settlements offer jobs, facilities, and services accessible by sustainable travel modes.



New cycle and walkways facilitate sustainable travel.

11.2. The spatial strategy in chapter 3 focuses on sustainable development locations, limiting the need to travel and offering various transport modes. Promoting sustainable transport in new developments reduces traffic congestion, lowers carbon emissions, improves air quality, and enhances physical and mental health. It also prevents social exclusion for those without car access, such as young people, older people, those with disabilities, and low-income households.

## Walking, Cycling and Public transport

11.3. This policy prioritises walking, wheeling, cycling, and public transport for short local journeys and as part of longer journeys. It mandates the prioritisation of walking and cycling routes in new developments and facilitates access to high-quality public transport.

## **Strategic Policy TR01: Prioritising walking, wheeling, cycling, and public transport**

Walking, wheeling, cycling and public transport should be the natural first choice for short local journeys, or as part of a longer journey. Walking and cycling routes must be prioritised in new development – such routes should be coherent, direct, safe, comfortable and attractive. Where appropriate, cycle paths should be segregated from pedestrians to reduce the potential for conflict (for example, where high usage levels are anticipated).

New development should facilitate access to high quality public transport through its location, layout, and, where necessary, contributions to public transport services and/or facilities (for example, bus services, bus stops, bus priority measures, rail infrastructure).

Where appropriate, development should provide, or otherwise make contributions to, an easy interchange between active and shared transport modes through the delivery of mobility hubs.

Development which would result in the loss or reduce the convenience or attractiveness of an existing or proposed footpath, cycleway or bridleway, will not be permitted unless an acceptable alternative route is provided.

### **Justification for inclusion of policy**

- 11.4. Exmouth, Honiton, Seaton, and Ottery St Mary have bespoke bus services, with several high-frequency routes linking East Devon settlements to Exeter. The district has nine train stations across two lines, with significant usage increases over the past 20 years. High-quality active travel corridors, like the Exe Estuary Trail, are also present.
- 11.5. Most people prefer to walk if their destination is within 1.6 km (1 mile), typically 800m (0.5 miles). Factors such as topography, surveillance, directness, and attractiveness also influence walking choices. While it is unrealistic to require all new developments in rural East Devon to be within 800m of various uses, this is feasible in larger settlements and developments.
- 11.6. The National Model Design Code advocates walking and cycling for short local journeys, especially those under five miles. In the South West, 43% of journeys are under two miles, offering significant potential for walking or cycling instead of driving. Wheeling includes wheelchair and mobility scooter users.

- 11.7. Sustainable travel 'mobility hubs' can promote walking, cycling, and public transport by providing facilities like secure cycle storage, bike hire, electric vehicle charging, car sharing spaces, and bus stops in one location. These hubs are ideal for key locations such as train stations, bus stops, and Park and Ride sites.
- 11.8. East Devon, being predominantly rural, has a substantial public rights of way network that this policy seeks to protect and enhance.

## Protecting transport sites and routes

- 11.9. This policy supports the delivery and protection of sites and routes critical for developing infrastructure to widen transport choice and facilitate large-scale development.

### Strategic Policy TR02: Protecting transport sites and routes

The council will support the delivery of sites and routes that are critical in developing infrastructure to widen transport choice and realise opportunities for large scale development. New developments should also seek to aid the delivery of transport routes taking into account the needs they generate and also potential that may arise though later developments in adjoining or nearby areas

The following proposed transport sites and routes will be protected from other development that will preclude their delivery.

1. Strategic cycle network schemes:
  - a. Clyst Valley Trail
  - b. Sidford to Sidbury
  - c. Cranbrook to Exeter (E3)
2. Public transport:
  - a. Railway passing loop(s) as necessary between Honiton and Cranbrook.
  - b. Bus priority route at A3052/A376 to M5 Junction 30.



c. Park and Ride areas of search at A3052 near Clyst St Mary.

3. Road schemes:

- a. Alterations/improvements to Clyst St Mary roundabout (A3052/A376)
- b. The route of Axminster relief road.

### Justification for inclusion of policy

- 11.10. The policy aims to identify and safeguard sites and routes essential for enhancing transport infrastructure and promoting sustainable travel. This includes park and ride sites, train stations, bus priority measures, and walking/cycling routes. Protecting these sites and routes aligns with national policy and supports the development of a comprehensive transport network.
- 11.11. New developments should contribute to the delivery of these transport routes, considering the needs they generate and potential future developments in nearby areas. The policy ensures that strategic cycle network schemes, public transport improvements, and necessary road schemes are safeguarded from other developments that could hinder their implementation.

### Travel plans, Transport Statements and Transport Assessments

- 11.12. This policy requires developments likely to generate significant vehicle movements to be supported by a transport statement or assessment and a travel plan to ensure sustainable travel arrangements..

#### Policy TR03: Travel Plans, Transport Statements, Transport Assessments

Where development is likely to generate significant amounts of vehicle movements, planning permission will not be granted unless they are supported by a transport statement or transport assessment, and subsequent travel plan, that identifies measures to secure new sustainable travel arrangements, taking into account:

- a) The scale of the development; and



- b) The availability of public transport, walking and cycling opportunities; and
- c) Proximity to environmental designations; and
- d) Cumulative impacts of other development in the area; and
- e) Whether there are particular types of impacts that require further evaluation.

## Justification for Inclusion of policy

- 11.13. The spatial strategy and policies prioritising sustainable transport aim to limit the need to travel and offer genuine transport choices. However, new developments will still generate car travel, especially in rural East Devon, necessitating policies to address transport network impacts. Congestion is a particular issue in western East Devon and eastern Exeter, affecting peak travel times.
- 11.14. National policy mandates that developments generating significant movement must provide a travel plan and be supported by a transport statement or assessment to evaluate likely impacts. Travel plans integrate sustainable travel proposals into planning, transport assessments thoroughly evaluate transport implications, and transport statements offer a lighter approach for limited impacts.

## Parking Standards

- 11.15. This policy sets minimum parking standards for new residential and employment developments, considering car and cycle parking requirements to promote sustainable transport and reduce emissions.

## Policy TR04: Parking standards

### Residential car parking standards

Parking in new residential development should provide the following minimum parking provision, unless evidence shows that a different provision

is more appropriate based on public transport accessibility or presence of locally available off road car parking provision.

Use	Car Parking Requirements	Cycle Parking Requirements (Secure and Undercover)
Residential Dwelling	Average of 1.7 spaces per dwelling (rounded up to the nearest whole number in individual applications).	1 space per Bedroom

Car parking spaces must be of an adequate size to accommodate vehicle parking and have sufficient width to the sides for pedestrian access and egress of vehicles taking account of the location of the parking space and whether or not spaces also serve as access to a property and adjacent obstructions.

Garage spaces will not count toward the overall quantum of car parking spaces.

## Employment development parking standards

Car parking provision to serve new development should meet the standards set out below, unless it is demonstrated through robust assessment that alternative levels are more desirable and appropriate.

Type/Use	Car Parking	Short Stay Cycle Parking (obvious, easily accessed and close to destination)	Long Stay Cycle Parking (secure and ideally covered)
Class B2/E(g)	1 per 30 sqm	1 per 1,000m <sup>2</sup>	1 per 500m <sup>2</sup>
Class B8	1 per 200 sqm	1 per 1,000m <sup>2</sup>	1 per 500m <sup>2</sup>
Class E(a) Non-food retail and general retail	1 per 20 sqm	1 per 6 staff	1 per 200 sqm
Class E(a) supermarket/ Food retail	1 per 14 sqm	1 per 6 staff	1 per 200 sqm
Class E(b)/ Sui Generis Hot food takeaways (including drive throughs)	1 per 25 sqm	2 per establishment	1 per 8 staff
Class C1	1 per bedroom	1 space per 10 bedrooms	1 space per 10 staff

All new parking provision must provide provision of charging points to charge electric vehicles and electric bikes.

## Justification for policy

- 11.16. The National Planning Policy Framework (NPPF) outlines five key issues for setting local parking standards: accessibility, development type and mix, public transport availability, local car ownership levels, and the need for charging spaces for ultra-low emission vehicles. Given East Devon's rural nature and higher-than-average car ownership, these standards ensure adequate parking while promoting cycling and reducing emissions. Garages are rarely used for car storage and so will not be counted as part of the required car parking provision.
- 11.17. New residential developments should provide bicycle parking to encourage cycling. In 2019, surface transport emissions accounted for over one-fifth of the UK's total greenhouse gas emissions, with cars and vans contributing 77.9%<sup>9</sup>.
- 11.18. In East Devon, road transport emissions were over one-third of the district's total CO2 emissions. The government mandates increasing production of zero-emission vehicles, aiming for 80% of new cars and 70% of new vans to be zero-emission by 2030, reaching 100% by 2035<sup>10</sup>. East Devon District Council (EDDC) supports this transition through electric vehicle infrastructure and smarter choices.
- 11.19. For residential parking, the methodology is based on guidance from the Department for Communities and Local Government (DCLG) and local car ownership data from the 2021 census, resulting in a minimum standard of 1.7 parking spaces per dwelling. In town centres with access to public car parks or on-street parking, lower levels may suffice. In areas with excellent public transport links, car parking spaces may not be necessary.
- 11.20. New employment developments should adhere to the outlined parking standards. Applications proposing different levels must be justified by robust evidence in a Transport Assessment, Transport Statement, or Travel Plan, considering local circumstances.

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<sup>9</sup> The Sixth Carbon Budget Surface Transport, 2020: <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Surface-transport.pdf>

<sup>10</sup> Zero Emission Vehicle (ZEV) Mandate Consultation, 2023: <https://www.gov.uk/government/consultations/a-zero-emission-vehicle-zev-mandate-and-co2-emissions-regulation-for-new-cars-and-vans-in-the-uk/outcome/zero-emission-vehicle-zev-mandate-consultation-summary-of-responses-and-joint-government-response>

- 11.1 All new developments must provide Electric Vehicle (EV) charging points in accordance with the Building Regulations 2010<sup>11</sup> and relevant government guidance, including the Devon Electric Vehicle Charging Strategy<sup>12</sup>.

## Aerodromes and Safeguarding

- 11.21. This policy ensures that developments within aerodrome safeguarded areas and Public Safety Zones do not compromise the safe operation of protected aerodromes or public safety.

### Policy TR05: Aerodrome Safeguarded Areas and Public Safety Zones

Within aerodrome safeguarded areas and the Public Safety Zones for Exeter International Airport, planning permission will not be granted for development that would prejudice the safe operation of protected aerodromes or give rise to public safety concerns.

There is a general presumption against new or replacement development or changes of use of existing buildings within Public Safety Zones. In particular, no new or replacement dwellings, mobile homes, caravan sites or other residential buildings will be permitted within a Public Safety Zone. Other forms of development will be acceptable, provided they do not reasonably expect to increase the number of people living, working or congregating in the area.

Development that could have an adverse impact on the operation or safety or navigational systems at the Airport will not be permitted unless they provide suitable mitigation to address adverse impacts arising (for example, funding for system upgrades).

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<sup>11</sup> Approved Document S: infrastructure for charging electric vehicles, 2021:

[https://assets.publishing.service.gov.uk/media/6218c5d38fa8f54911e22263/AD\\_S.pdf](https://assets.publishing.service.gov.uk/media/6218c5d38fa8f54911e22263/AD_S.pdf)

<sup>12</sup> Devon Electric Vehicle Charging Strategy, adopted 2024:

<https://devoncc.sharepoint.com/:b:/s/PublicDocs/Highways/EYpT2z19y01HsZuuHCvwut8BqqTwB91bzCaxytQ3kmpkkg?e=n3QCnQ>

## **Justification for policy**

- 11.22. The Civil Aviation Authority has identified safeguarded areas around Exeter International Airport and Dunkeswell Airport, as well as a MoD facility in Mid Devon affecting the northern part of the plan area. The Council will consult with the Civil Aviation Authority and airport operators on planning applications that could impact airfield operation and safety, following ODPM Circular 1/2003. This includes developments with high structures, those that may interfere with radio signals, or create bird strike hazards.
- 11.23. Public Safety Zones, identified by the Department for Transport, are areas where the annual risk of fatality from an aircraft accident is not less than 1 in 100,000. Within these zones, there is a smaller area with a higher risk of 1 in 10,000. The policy presumes against new or replacement development or changes of use within these zones, particularly prohibiting new residential buildings. Other developments are acceptable if they do not increase the number of people in the area.
- 11.24. Developments that could adversely impact the operation or safety of navigational systems at the airport will not be permitted unless they provide suitable mitigation, such as funding for system upgrades.

## **Communications**

- 11.2 The NPPF guides local authorities to facilitate the development of a high-quality communications infrastructure in support of economic growth and social well-being. The NPPF makes clear that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technologies (such as 5G). Further, the NPPF sets out how these policies should be balanced with other considerations, including conserving and enhancing both the natural and historic environment.

## **Digital Connectivity**

- 11.3 East Devon faces challenges in delivering communications infrastructure in a rural area. East Devon is part of the Connecting Devon and Somerset (CDS) programme. CDS comes under the Government's Superfast Broadband Programme to deliver next-generation broadband infrastructure to areas where the commercial market has failed to invest.

- 11.4 According to Ofcom, in 2024 92.53%<sup>13</sup> of the addresses in East Devon have super-fast broadband coverage and 66.05%<sup>14</sup> have ultra-fast broadband coverage, in comparison the mean for all English district local authorities are 96.61% and 73.24%. This policy ensures that major developments have access to superfast broadband and high-quality communications infrastructure, supporting economic growth and social well-being.

## Strategic Policy TR06: Digital Connectivity

Planning permission for major developments, that will be used or occupied by people, will not be granted unless the scheme will have access to terrestrial or satellite superfast broadband and high-quality communications.

All new ducting to serve new developments must be installed with capacity for more than one provider and other provisions to enable the delivery of multi-operator fibre to the premises and sufficient mobile connectivity.

Developers are encouraged to have early discussions with strategic providers or Connecting Devon and Cornwall for major development and continuing to support the expansion of full-fibre broadband connections in the district.

## Justification for policy

- 11.5 Paragraph 118 of the NPPF, planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.
- 11.6 The Building etc. (Amendment) (England) (No. 2) Regulations 2022<sup>15</sup> came into force on 26 December 2022. These regulations introduce gigabit broadband infrastructure and connectivity requirements for the construction of new homes in England.

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<sup>13</sup> Percentage of addresses with superfast broadband availability in East Devon, 2024:

[https://lginform.local.gov.uk/reports/lgastandard?mod-metric=3758&mod-area=E07000040&mod-group=AllDistrictsInCountry\\_England&mod-type=namedComparisonGroup](https://lginform.local.gov.uk/reports/lgastandard?mod-metric=3758&mod-area=E07000040&mod-group=AllDistrictsInCountry_England&mod-type=namedComparisonGroup)

<sup>14</sup> Percentage of addresses with ultrafast broadband availability in East Devon, 2024:

[https://lginform.local.gov.uk/reports/lgastandard?mod-metric=9175&mod-area=E07000040&mod-group=AllDistrictsInCountry\\_England&mod-type=namedComparisonGroup](https://lginform.local.gov.uk/reports/lgastandard?mod-metric=9175&mod-area=E07000040&mod-group=AllDistrictsInCountry_England&mod-type=namedComparisonGroup)

<sup>15</sup> The building etc. (Amendment) (England) Regulations 2022:

<https://www.legislation.gov.uk/uksi/2022/603/contents/made>

- 11.7 East Devon District Council would support further digital connectivity and high-quality communications improvements in the district by liaising with delivery partners and operators in the area and supporting the community engagement of their programmes.

## Wireless connectivity and telecoms infrastructure

- 11.8 Fast and reliable wireless connectivity and telecoms infrastructure are essential for supporting smart technology in homes, workplaces, and travel. Businesses depend on robust communications infrastructure to connect with customers, suppliers, and employees, ensuring efficient operations. This infrastructure includes masts, antennas, ground-based cabinets, and compounds.

### Policy TR07: Wireless connectivity and telecoms infrastructure

Proposals will only be permitted where they accord with the principles of good practice for wireless network development, including, but not limited to:

- Site sharing and use of existing infrastructure or buildings to house new development
- Consultation with the local planning authority, local communities and other stakeholders
- Considered siting and design, avoiding harm to landscape character, heritage, environment, and bio-diversity
- Compliance with guidance laid out in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) public exposure levels guidance

Proposals within National Landscapes or at sensitive locations must provide a Landscape and Visual Impact Assessment and, where in the vicinity of a heritage asset as Heritage Impact Assessment.

A condition will be imposed on any permission granted to ensure the removal of equipment, supporting apparatus, and the restoration of the site to its former condition, or to a standard to be agreed with the Authority, as soon as reasonably practicable after it is no longer required for electronic communications purposes.



Where appropriate, future permitted development rights will be restricted by condition to prevent harm to landscape character, heritage, environment, and bio-diversity.

## Justification for Policy

- 11.25. The National Planning Policy Framework (NPPF) highlights the importance of advanced, high-quality, and reliable communications infrastructure for economic growth and social well-being. The Future Telecoms Infrastructure Review (FTIR) and the National Infrastructure Strategy outline the government's strategy for achieving digital connectivity targets and delivering high-quality infrastructure across the UK.
- 11.9 The Code of Practice for Wireless Network Development in England (2022)<sup>16</sup> guides the provision of telecoms infrastructure, covering all forms of wireless development, including masts and cabinets. This Code was developed by the Department for Digital, Culture, Media and Sport (DCMS) in collaboration with industry representatives, government departments, local planning authorities, and protected landscape bodies.
- 11.26. Proposals for wireless connectivity and telecoms infrastructure must adhere to the principles of good practice, including site sharing, consultation with stakeholders, considered siting and design, and compliance with International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines. Proposals in National Landscapes or sensitive locations require a Landscape and Visual Impact Assessment and, if near heritage assets, a Heritage Impact Assessment.
- 11.27. Conditions will be imposed to ensure the removal of equipment and site restoration once it is no longer needed for electronic communications. Future permitted development rights may be restricted to prevent harm to landscape character, heritage, environment, and biodiversity.

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<sup>16</sup> Code of practice for wireless network development in England, 2022:  
<https://www.gov.uk/government/publications/code-of-practice-for-wireless-network-development-in-england/code-of-practice-for-wireless-network-development-in-england>

## Chapter 12. Our Outstanding Landscape

- 12.1 East Devon has a beautiful natural environment, which makes the District an attractive place to live and work. This environment also attracts visitors who contribute to the local economy.



FIGURE 10 East Devon's outstanding landscape

### Landscape Features

- 12.1. This policy protects East Devon's landscape, countryside, and rural areas from harmful development. Development is permitted only if a proportionate Landscape Appraisal demonstrates it will protect and enhance valued landscape attributes and special features.

#### Policy OL01: Landscape Features

East Devon's landscape, countryside and rural areas will be protected against harmful development. Development will only be permitted where the applicant is able to demonstrate through a proportionate Landscape Appraisal that it will protect and enhance valued landscape attributes and special features and qualities that contribute to the character of East Devon's

landscapes, in particular where it would not harm the distinctive landscape, amenity and environmental qualities within which it is located, including:

- a. Land form and patterns of settlement.
- b. Important natural and manmade features which contribute to the local landscape character, including topography, traditional field boundaries, trees and woodlands, areas of importance for nature conservation and rural buildings.
- c. The adverse disruption of a view from a public place which forms part of the distinctive character of the area or otherwise causes significant visual intrusions.
- d. Aesthetic and perceptual factors such as tranquillity, wildness and dark skies.

All development in the countryside should have regard to the most up to date Landscape Characterisation Assessments as a basis for understanding, maintaining and enhancing local distinctiveness and landscape character as well as up to date strategy and guidance for trees and woodlands.

## **Justification for inclusion of policy**

- 12.2. This overarching policy aims to protect important landscape features, whether designated or not. A key objective of the Local Plan is to conserve and enhance the environment, landscape, historic character, archaeological value, wildlife, agricultural, recreational, and natural resource value of countryside areas. All development in the countryside should consider the District Landscape Characterisation Assessment (LCA) and the Council's Tree Strategy to maintain and enhance local distinctiveness and landscape character.
- 12.3. East Devon's landscape includes deep valleys, wooded hills, ancient woodlands, historic parkland, low-lying farmland, riverside meadows, and various urban forms. The district is rich in biodiversity, with international, national, and locally protected sites and habitats forming part of a wider ecological network. Maintaining sustainable agricultural land and practices is crucial for preserving the district's rural character and landscape.
- 12.4. Proposals should be accompanied by a proportionate Landscape Appraisal, conducted in accordance with the Guidelines for Landscape and Visual

Impact Assessment<sup>17</sup> and successor documents. If a full Environmental Impact Assessment (EIA) is required, a Landscape and Visual Impact Assessment (LVIA) by a Chartered Landscape Architect will be necessary.

## National Landscapes

- 12.5. This policy ensures the highest level of protection for the landscape and scenic beauty of National Landscapes (NLs) in East Devon, including the Heritage Coast.

### Strategic Policy OL02: National Landscapes (Areas of Outstanding Natural Beauty)

The highest level of protection will be given to the landscape and scenic beauty of the National Landscapes (NL's) in East Devon:

Development in a NL, or outside but affecting its setting or appearance, will only be permitted where it conserves and enhances the character and natural beauty of the NL;

Major development in a NL will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest; and

Any relevant National Landscape Management Plans will be a material consideration in decision making.

This policy will also apply to the Heritage Coast.

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<sup>17</sup> Guidelines for Landscape and Visual Impact Assessment 3rd Edition, 2013 (Landscape Institute & IEMA)



FIGURE 11 East Devon has significant National Landscapes (formerly AONB's).  
[Update map to reflect new terminology](#)

## Justification for inclusion of policy

- 12.6. National Landscapes (NLs), formerly Areas of Outstanding Natural Beauty (AONBs), cover around two-thirds of East Devon, including several villages and Budleigh Salterton. The district contains two NLs: the East Devon NL in the south and the Blackdown Hills NL in the north, which extends into neighbouring Mid Devon and Somerset. A small part of the Dorset NL also extends into the east of the district. These areas have the highest level of landscape protection in England, equivalent to National Parks, and are designated by the Secretary of State, meaning their boundaries and statutory protection cannot be altered through the local plan process.
- 12.7. This policy is necessary to ensure the protection and conservation of East Devon's NLs in accordance with the Countryside and Rights of Way Act 2000 (CROW Act), the Levelling Up and Regeneration Act 2023, and the National Planning Policy Framework (NPPF).

## Coastal Preservation Areas

- 12.2 This policy designates land around the coast and estuaries of East Devon as a Coastal Preservation Area, protecting its undeveloped and open status while supporting appropriate proposals that increase public access to the coast.

### Strategic Policy OL03: Coastal Preservation Areas

Land around the coast and estuaries of East Devon, as identified on the Policies Map, is designated as a Coastal Preservation Area. Development or any change of use in the defined area will not be allowed if it would damage the undeveloped/open status of the designated area or where visually connected to any adjoining areas.

The Coastal Preservation Area is defined on the basis of visual openness and views to and from the sea or estuaries. Appropriate proposals which increase public access to the coast will be supported.

### Justification for inclusion of policy

- 12.8. The majority of East Devon's coastline is part of the Jurassic Coast World Heritage Site (WHS), recognised by UNESCO for its outstanding rocks, fossils, and landforms. The wider setting of the cliffs significantly contributes to the landscape. The National Planning Policy Framework (NPPF) requires local authorities to maintain the character of the undeveloped coast while improving public access where appropriate. This policy protects the character of the undeveloped coast, including the WHS, and designates a Coastal Preservation Area based on a detailed character assessment of visual openness and views to and from the sea.

### Areas of Strategic Visual Importance

- 12.9. This policy ensures that development proposals preserve the visual integrity, identity, and scenic quality of East Devon by conserving and enhancing key views and landmarks.



## Policy OL04: Areas of Strategic Visual Importance

Development proposals will only be permitted where they preserve the visual integrity, identity and scenic quality of the District, in particular by conserving and enhancing key views and views of local landmarks, including those identified in Neighbourhood Plans.

The following view types are considered to be particularly important:

1. Landmark views to and from viewpoints and tourism and recreational destinations, including the coast, woodland and open countryside;
2. Views from publicly accessible areas which are within, to or from settlements which contribute to the viewers' enjoyment of the local area;
3. Views from public rights of way and other publicly accessible areas;
4. Night-time views of dark skies, particularly where lighting is to be introduced in areas of low existing light pollution; and
5. Views which include or otherwise relate to specific features relevant to East Devon and its special qualities, such as key landmarks, heritage assets (either in view or the view from) and biodiversity features.

Development proposals should conserve and enhance sequential views, and not result in adverse cumulative impacts within views.

### Justification for inclusion of policy

- 13 The policy aims to protect important views and landmarks, encouraging the conservation and enhancement of key view types and patterns. It ensures development does not detract from the visual integrity, identity, and scenic quality characteristic of East Devon. Site-based assessments should follow the latest guidelines for Landscape and Visual Impact Assessment (LVIA)<sup>18</sup> and be proportionate to the scheme's size and impact. If an LVIA is not required, a simple landscape assessment may suffice.
- 14 Sources of information for assessments include the East Devon and Blackdown Hills Landscape Character Assessment (2019)<sup>19</sup>, What Makes a

<sup>18</sup> Guidelines for Landscape and Visual Impact Assessment 3rd Edition, 2013 (Landscape Institute & IEMA)

<sup>19</sup> East Devon and Blackdown Hills Landscape Character Assessment, 2019:  
[https://eastdevon.gov.uk/media/2816886/lca\\_complete\\_final\\_march-2019\\_low-res.pdf](https://eastdevon.gov.uk/media/2816886/lca_complete_final_march-2019_low-res.pdf)

View (Blackdown Hills AONB, 2013)<sup>20</sup>, the Devon historic environment record<sup>21</sup>, Village Design Statements, Conservation Area Character Appraisals and Management Plans, Local Landscape Character Assessments, and Neighbourhood Plans. These should inform development proposals and be provided early in the planning process.

## Green wedges

- 12.10. This policy restricts development within green wedges to prevent settlement coalescence and maintain the individual character and identity of settlements.

### Policy – OL05: Green wedges

Within green wedges, as defined on the Policies Map, development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.

### Justification for inclusion of policy

- 12.11. Green wedges are a long-standing local landscape designation that maintains open green networks between settlements to prevent coalescence and preserve local identity. New buildings within green wedges are restricted to ensure the openness, role, and function of these landscapes are not adversely affected. Proposals for new buildings must be proportionate in size and scale to their intended use, with evidence required for larger agricultural buildings.
- 12.12. Essential infrastructure, such as sewage or water connections, power sources, waste water recycling/treatment sites, electricity substations, new roads, emergency services, or telecommunications, is permitted if necessary for connection purposes and if benefits outweigh the impact on the designation. Buildings for outdoor sport and recreation, cemeteries with

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<sup>20</sup> What makes a view? 2013: <https://blackdownhillsaonb.org.uk/wp-content/uploads/2018/05/what-makes-a-view.pdf>

<sup>21</sup> Devon Historic Environment Record: <https://www.devon.gov.uk/historicenvironment/the-devon-historic-environment-record/>



ancillary buildings, and allotments are acceptable in principle, judged on a site-by-site basis.

- 12.13. The Council supports new buildings for community use, including educational facilities, if a green wedge location is justified. Economic growth and re-use of existing buildings for employment must not undermine the green wedge's role and function or lead to or contribute to settlement coalescence. New buildings for employment are permitted only if they support the sustainable growth of existing, authorised rural businesses. Start-up businesses are not permitted to avoid proliferation of new buildings unconnected to existing sites and uses, which may harm openness and landscape character.

## **Policy – OL06: Land of Local Amenity Importance or Local Green Space**

This policy will apply to Local Green Spaces, designated through Neighbourhood Plans (and identified on maps in those documents), and to the established Land of Local Amenity Importance areas (as shown on the Policies Map).

Within the Local Green Space or Land of Local Amenity Importance areas, development will be restricted to those limited types of appropriate development set out below, unless very special circumstances can be demonstrated.

Appropriate development, compatible with the reasons for which the land was designated, is considered to be:

- a. buildings for agriculture and forestry;
- b. provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries and allotments, provided they do not conflict with the purpose of the LGS/LLAI designation;
- c. the extension or alteration of a building provided that it does not result in a disproportionate addition over and above the size of the original building;
- d. the replacement of a building, provided the new building is in the same (or a preferable) community use and not materially larger than the one it replaces.

All development proposals should be carefully designed and managed to minimise visual impact, respect the reasons for which the site was designated, and ensure the continued integrity of the site.

Development proposals outside LLAI or LGS, but conspicuous when viewed from it, should minimise any detrimental impacts to the visual amenity and respect reasons for which the site was designated. Development proposals which improve accessibility to, or enhance the use of LLAI/LGS will be supported.

## Justification for inclusion of policy

- 14.2 The policies in this plan provide important protection to the natural environment within East Devon and are likely to help preserve the character and integrity of important green areas within and around the District. However, there is potential for development pressure to erode and impact upon smaller green areas which are particularly important to local communities. This policy seeks to give added protection against development to specific locally valued green areas or open spaces, including those which are identified during the period of this Local Plan.
- 14.3 The Land of Local Amenity Importance designation will convey protection separate to (and in some cases in addition to) the Local Green Space designation which some East Devon communities have identified (and will identify) through Neighbourhood Plans.
- 14.4 Land of Local Amenity Importance is a long-standing designation recognising a number of specific small parcels of land highly valued by local communities. The Local Plan recognises the particular visual, and other, importance of 14 sites within 5 of the District's towns and restricts development that is not for a community purpose or that would undermine the open character of the area. The sites are deemed to be locally significant, with opportunities of enhancement to provide multiple benefits, including improved water quality, access, biodiversity, recreational, health and educational benefits.
- 14.5 The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. It is envisaged that communities will use this designation to formally protect such areas in future, rather than identifying additional Land of Local Amenity Importance. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. As outlined in national policy, Local Green Space designation should only be used where the green space is in reasonably close proximity to the community it serves; demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of wildlife; and local in character and is not an extensive tract of land.
- 14.6 As additional Local Green Spaces may be identified during the life of the Local Plan it is not possible to identify these areas on the Policies Map, but the policy will apply to LGS in made Neighbourhood Plans.

- 14.7 Development within, or in close proximity to the Local Green Space or Land of Local Amenity Importance, should respect reasons for which the site was designed and minimise any impacts on it.

## **Contaminated Land**

- 12.14. This policy requires a contaminated land assessment for development sites where contamination is anticipated, ensuring safe remediation and mitigation.

### **Policy – OL08: Contaminated Land**

Where it is anticipated that contamination may be present on or near to a development site, planning applications should be supported by a proportionate contaminated land assessment. The assessment must:

- a. Identify and characterise the contamination;
- b. Identify the risks; and
- c. Identify remediation and/or mitigation measures if required.

Where identified as necessary, agreed measures must be taken to remediate the site prior to or during development. Ongoing monitoring may also be required.

Development on or in close proximity to active or former waste sites will only be permitted where it can be demonstrated that there will be no harm to future occupiers of the site from leachate or landfill gas or other waste arising

### **Justification for inclusion of policy**

- 12.15. East Devon has limited contaminated land, but safe decontamination is beneficial. Remediating and mitigating contaminated or unstable land enhances the local environment. Applications must demonstrate site suitability, considering ground conditions, hazards, and remediation proposals. After remediation, land must not be classified as contaminated under the Environmental Protection Act 1990.

## Potentially Hazardous Developments and Notifiable Installations

12.16. This policy ensures that development within notified consultation zones around hazardous installations poses no health and safety risks.

### Policy – OL09: Potentially Hazardous Developments and Notifiable Installations

Proposals for development within a notified consultation zone around a hazardous installation will be permitted only if there is no health and safety risk to that development or occupants, users or the development or to surrounding areas.

### Justification for inclusion of policy

12.17. Certain sites and pipelines are designated as notifiable installations due to hazardous substances. East Devon contains high-pressure gas pipelines and other hazardous sites. While these are regulated under health and safety legislation, controlling development near these zones is prudent. The Health and Safety Executive advises on consultation distances. Consent for hazardous substance-related development will not be granted if it increases health and safety risks.

### Control of pollution

12.18. This policy prevents development that would result in unmitigated pollution, protecting the environment and public health.

## Policy – OL10: Control of Pollution

Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include:

- a. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot;
- b. Pollution of surface or underground waters, for example by untreated sewage, including:
  - 1. Rivers, other watercourses, water bodies and wetlands;
  - 2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
  - 3. Harbours, estuaries or the sea;
- c. Noise and/or vibration;
- d. Light intrusion, where light overspill from street lights or floodlights on to areas not intended to be lit, particularly in areas of open countryside and areas of nature conservation value;
- e. Fly nuisance;
- f. Pollution of sites of wildlife value, especially European designated sites or species;
- g. Odour.

Where there is an identified risk of pollution, new development should be accompanied by a construction environment management plan (CEMP) to include details of protection, mitigation and enhancement measures, including SuDS and how soil will be managed during construction to avoid compaction and sediment laden run-off.

### Justification for inclusion of policy

12.19. Pollution significantly impacts health and quality of life. Development proposals must consider potential pollution effects, and relevant authorities will be consulted early. The Council aims to control and reduce pollution, requiring detailed lighting schemes to minimise light pollution. Decisions will ensure new developments do not pose pollution risks to existing developments and are appropriate for their location.

- 12.20. Where there is an identified risk of pollution, new development should be accompanied by a Construction Environment Management Plan (CEMP). The CEMP should include details of protection, mitigation, and enhancement measures, such as Sustainable Drainage Systems (SuDS) and soil management during construction to avoid compaction and sediment-laden run-off.
- 12.21. The Council will consult statutory pollution control authorities at an early stage for proposals that may raise pollution concerns. This ensures that developments are assessed for their potential impacts on health, the natural environment, and amenity. The cumulative impacts on air quality will be considered, and developments within Air Quality Management Areas must align with local air quality action plans.
- 12.22. External lighting proposals must demonstrate that lighting is the minimum needed for security and working purposes, minimising light pollution from glare and spillage. This is particularly important in areas of open countryside and nature conservation value, ensuring that lighting does not detract from residential amenity or highway safety.
- 12.23. By addressing these various forms of pollution, the policy aims to safeguard the environment and public health, ensuring that development in East Devon is sustainable and responsible.

## **High Quality Agricultural Land**

- 12.24. This policy restricts development on the best and most versatile agricultural land (Grades 1, 2, and 3a) unless there is an overriding need and no suitable lower-grade land is available.

### **Policy OL11: Development on High Quality Agricultural Land**

Unless allocated for development under another plan policy, planning permission for development affecting the best and most versatile agricultural land (Grades 1, 2 and 3a) will only be granted if there is an overriding need for the development and either:

- a. Sufficient land of a lower grade (Grades 3b, 4 and 5) is unavailable, or available lower grade land has an environmental value recognised by a statutory wildlife, historic, landscape or archaeological designation outweighing the agricultural considerations. Or

- b. The benefit of the development justifies and clearly outweighs the loss of high quality agricultural land.

If best and most versatile land needs to be developed, and there is a choice between sites in different grades, land of the lowest grade available must be used except where other sustainability considerations, including intrinsic nature conservation value of a site, outweigh land quality issues.

Where best and most versatile land is developed a soil handling plan and sustainable soil management strategy based on detailed soil surveys should be submitted as part of the planning application.

### **Justification for inclusion of policy**

- 12.25. East Devon has a significant amount of high-quality agricultural land, particularly near settlements where development pressures are greatest. Local Plan policy aims to conserve and protect the highest grades of agricultural land, balancing this with the need to accommodate development.
- 12.26. Soils are a finite, multi-functional resource essential for wellbeing and prosperity. Development decisions should consider the impact on soils, their intrinsic character, and the sustainability of the ecosystem services they provide. When developing the best and most versatile agricultural land, a soil handling plan and sustainable soil management strategy, based on detailed soil surveys, will be required to minimise detrimental impacts.



# Chapter 13. Our Outstanding Biodiversity and Geodiversity

## Introduction

- 13.1. East Devon boasts a rich abundance of biodiversity and geodiversity, from Internationally Designated Sites to extensive networks of priority habitats and protected species. These resources are invaluable for nature conservation, scientific research, health and wellbeing, education, climate change mitigation, flood risk management, air and water purification, and the economy.
- 13.2. However, these natural assets are threatened by factors such as climate change, agriculture, pollution, land use change, urbanisation, and population growth. These impacts can be complex, arising through both direct and indirect mechanisms.
- 13.3. The importance of wildlife and the natural world is increasingly recognised by the Government, as evidenced by the Environment Act 2021 and the Government's 25 Year Environment Plan.
- 13.4. The new local plan policies aim to protect, enhance, and expand existing biodiversity features while creating new habitats. The plan seeks to improve the quality and accuracy of ecological information and enhance avoidance, mitigation, and compensation outcomes from granted permissions.
- 13.5. All proposals should follow the Mitigation Hierarchy: first, avoid biodiversity impacts; if unavoidable, mitigate them; and as a last resort, compensate for residual impacts. Compensation should only be considered when avoidance and mitigation are unachievable. For developments requiring a Habitats Regulations Assessment, compensation is only permissible under exceptional circumstances of overriding public interest.



FIGURE 12 Seaton Wetlands

## Protection of wildlife sites

- 13.6. Many sites in East Devon are protected due to their intrinsic importance and the wildlife they support. These sites receive considerable legal protection, which is further articulated through planning policy. This policy clarifies existing legislation and government guidance, detailing when impacts may be permitted, expectations for biodiversity enhancement, and the designations included within the policy scope.

## **Policy – PB01: Protection of Internationally and Nationally important wildlife sites**

International and nationally designated wildlife sites are of greatest importance and must be given upper most protection.

Development proposals that would cause a direct or indirect adverse effect upon internationally and nationally designated sites will not be permitted unless all of the following criteria are met:

1. They cannot be located on alternative sites that would cause less or no harm.
2. The public benefits of the proposal clearly outweigh the impacts on the features of the site and the wider network of natural habitats and designated sites.
3. Suitable avoidance and mitigation (and exceptionally where legally compliant compensation) measures are secured, in accordance with the mitigation hierarchy.
4. Where permanent or long-term temporary habitat loss or direct reduction of habitat condition is identified, bespoke compensation measures will need to be agreed. This must be undertaken as early as possible and include utilisation of Discretionary Advice Service from Natural England.
5. In respect of internationally designated sites, the overall coherence of the national site network must be maintained.

Internationally designated sites falling under this aspect of policy include:

- Special Areas of Conservation (SAC)
- Special Protection Areas (SPA)
- Proposed SACs
- Potential SPAs
- Ramsar sites
- Proposed Ramsar sites

Areas secured as compensation for damage to an internationally or nationally designated site

Nationally designated sites falling under this aspect of policy include:

- Sites of Special Scientific Interest (SSSI)
- Marine Conservation Zones (MCZ)
- National Nature Reserves (NNR)

## Justification for inclusion of policy

- 13.8. Statutory designated wildlife sites benefit from substantial protection under national legislation. This policy does not duplicate these protections but provides additional detail on permissible impacts and biodiversity enhancement expectations. It also includes a specific Habitats Regulations Assessment (HRA) policy detailing requirements and existing East Devon mitigation strategies for impacts on European sites.

## Policy PB02: Protection of Regionally and Locally important wildlife sites

Development proposals that would cause a direct or indirect adverse effect upon Regionally and Locally important wildlife sites and features will not be permitted, unless all the following criteria are met:

1. They cannot be located on alternative sites that would cause less or no harm. When destruction of these habitats is proposed, proof of there being no satisfactory alternative will need to be provided.
2. The public benefits of the proposal clearly outweigh the impacts on the features of the site and the wider network of natural habitats and designated sites.
3. The sites have been surveyed in the optimal botanical period by a suitably experience botanist (FISC<sup>22</sup> level 4 (or equivalent) or above) in accordance with published (or updated) designation criteria<sup>23</sup> and suitability assessment.
4. Suitable avoidance, mitigation and compensation measures are proposed, in accordance with the mitigation hierarchy, consummate with the ecological value of the site affected, secure for the duration of the development, and providing like-for-like habitat restoration and/or creation, and ensuring that there is no degradation to the wider ecological networks and priority habitats.

Such sites include:

- Local Nature Reserves (LNR)
- County Wildlife Sites (CWS)
- Unconfirmed Wildlife Sites (UWS)
- Special Verges designated for biodiversity

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<sup>22</sup> Field Identification Skills Certificate

<sup>23</sup> The Devon Local Sites Manual Policies and Procedures for the Identification and Designation of Wildlife Sites, 2022: <https://www.dbr.org.uk/wp-content/uploads/2022/03/CWS-Guidelines-and-appendices-V1.4-March-2022.pdf>

## Justification for policy

**13.9.** Non-statutory sites of regional and local importance have limited protection under national legislation, relying on local planning policy and the NPPF. The council recognises the biodiversity value and strategic importance of these sites and priority habitats. These ecologically important and often irreplaceable features play a major role in ecosystem resilience and nature recovery. This policy provides clarity on when impacts may be permitted, expectations for biodiversity enhancement, and the designations included within the policy scope. County Wildlife Sites are determined by the Devon Wildlife Trust following rigorous assessment criteria. Unconfirmed County Wildlife Sites have been subject to initial review but not fully assessed to justify designation.

## Irreplaceable habitats and important features

13.10. This policy aims to protect irreplaceable habitats and important features such as ancient woodlands, veteran trees, and species-rich hedgerows from destruction or degradation.

### Policy – PB03: Protection of irreplaceable habitats and important features

Development proposals which would result in the destruction or degradation of irreplaceable habitats(1) will be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists;- this includes impacts through direct, adjacent, or indirect pathways, including lighting and pollution.

Habitats include ancient woodland, ancient and veteran trees (within and outside of ancient woodland).

#### Mature trees

Mature trees showing early signs of veteranisation or trees classified as 'notable' will require a high evidence burden for any proposed impacts, with mitigation and compensation measures consummate with their value.

## Hedgerows

Important hedgerows as defined by the Hedgerow Regulations 1997, and species-rich Devon hedges have a very high intrinsic biodiversity value. Proposals resulting in the loss and/or degradation of these hedgerows, will only be permitted where the mitigation hierarchy has been applied and evidenced in earnest.

Impacts should first be avoided, and where this is not possible, justification for impacts should be provided in full. Following this, suitable avoidance and mitigation measures should be proposed, followed by compensation measures as a last resort. Any compensatory hedges should be species-rich, include a bank, standard trees, and be mindful of temporal time scales to become a functional habitat in their replacement ratios.

Hedgerow translocation should always be considered first, as a preferential option to hedgerow destruction followed by compensation.

Hedgerow management should be in accordance with, Hedgelink guidance and the Tree, Hedge, and Woodland Strategy for East Devon. Any new hedges must be distinctive to the local area.

## Priority Habitats<sup>24</sup> and habitats supporting protected and notable species

Impacts on Priority Habitats and habitats which support the functionality of Priority Species, such as bat foraging and commuting habitats, cirl bunting nesting and foraging habitat will require adequate mitigation and compensation for any potential direct or indirect adverse impacts from development.

Mitigation and compensatory requirements, including details regarding long-term maintenance of functional habitats, must be explicitly quantified within submitted Ecological Impact Assessments (EclAs) to ensure these can be appropriately secured. EclAs should be informed by recent survey information undertaken at suitable time of year following best practice guidelines and BS 42020:2013.

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<sup>24</sup> Habitats of Principle Importance, as listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006: <https://www.legislation.gov.uk/ukpga/2006/16/contents> (identified through site survey work or as identified through existing mapped resources)

## Justification for inclusion of policy

- 13.11. Some habitats, including ancient woodlands and veteran trees, are irreplaceable due to their age, uniqueness, and biodiversity. Planning permission will not be granted for proposals that could harm these habitats unless there are exceptional reasons and a robust mitigation/compensation strategy, as per the NPPF.
- 13.12. Hedgerows, particularly in East Devon, are valuable biodiversity resources often threatened by development. Protecting and enhancing these features is crucial. The policy promotes the translocation of hedgerows over destruction, ensuring better quality and retention of ecological niches. Decision-makers should ensure that proposals include adequate mitigation and compensation measures, informed by recent ecological surveys and best practice guidelines.

## Habitat Regulation Assessment

- 13.1 The most significant wildlife sites in East Devon benefit from an international designation and for these sites and where adverse impacts may be possible from development there is a need for assessment under the Habitat Regulations to determine the acceptability of proposals. Plan policy set out details of the approach to be taken.

## Policy – PB04: Habitats Regulations Assessment

### HRA avoidance and mitigation strategies and guidance

Subject to exceptional circumstances referred to in policy PB01, proposed plans or projects must not adversely affect the integrity of sites protected under the Conservation of Habitats and Species Regulations 2017. These sites consist of:

1. Special Areas of Conservation (SAC)
2. Special Protection Areas (SPA)
3. Proposed SACs
4. Potential SPAs
5. Ramsar sites
6. Areas secured as sites compensating for damage to a European site.



The proponent of the plan or proposal must provide all necessary information to allow the planning authority to carry out Habitats Regulations Assessment (HRA) of the proposal.

Where there are likely significant effects to a European site, alone or in combination, from an application, mitigation measures will need to be secured. Appropriate assessment will be necessary and will need to ensure mitigation measures are adequate and secured for as long as the impact might occur. Legislation and government guidance requires the planning authority to be confident beyond reasonable scientific doubt that the proposals will not result in an adverse effect on the integrity of the site. Consequently, we will require evidence of a high quality and accuracy to inform HRA and we will seek the advice of the statutory conservation body (Natural England).

Where it is not possible to rule out adverse effects on integrity, alone or in combination with other plans or projects, permission will only be granted in exceptional circumstances. In such cases it will be necessary to demonstrate that there are no alternatives, there is over-riding public interest and compensation can be secured).

### **Specific HRA mitigation strategies and guidance**

Plans and proposals should take into consideration and be in accordance with the latest versions of all council and wider HRA guidance documents and strategies. These documents and strategies are intended to facilitate HRA assessment by providing a coherent strategic approach to the delivery of mitigation requirements whilst avoiding unnecessary duplication of assessment effort, where applicable. These documents include (existing and pending production):

- South-East Devon European Sites Mitigation Strategy (existing – undergoing review)
- Beer Quarry Caves SAC Guidance Document (existing)
- Exmouth Imperial Recreation Ground Events Protocol (existing)
- River Axe SAC Mitigation Strategy (proposed)
- Vehicle emission impacting on designated sites (proposed)

## **Specific HRA policy requirements in relation to avoiding, mitigating and compensating for HRA impacts**

### **The South-East Devon European Sites Mitigation Strategy (SEDESMS)**

In respect of the Exe Estuary SPA and the East Devon Pebblebed Heaths SPA/SAC (and Dawlish Warren SAC in Teignbridge District) an over-arching strategic approach to HRA mitigation has been established. All residential development schemes within a straight line 10 kilometers distance of any part of the European sites will be required to provide mitigation to offset increased recreational pressure associated with new development.

Developers must clearly demonstrate that mitigation can and will be provided to ensure no adverse effect on the integrity of the European sites and identify and secure mechanisms through which delivery will be achieved, secured in perpetuity, and delivered within agreed timescales. All mitigation is to be delivered in accordance with the most recently adopted/approved version of the strategy and supporting guidance.

### **Development within 400m of the East Devon Pebblebed Heaths SPA**

Predation of birds by domestic cats, direct recreational disturbance, and dog related impacts are identified as a particular concern on the East Devon Pebblebed Heaths. To help preserve the integrity of the East Devon Pebblebed Heaths, specifically on account of these potential impacts, new dwellings and tourist accommodation will not be permitted on or within 400 meters of the Pebblebed Heaths.

### **Nutrient neutrality in the River Axe SAC catchment**

East Devon District Council requires development proposals within the River Axe SAC catchment to demonstrate how nutrient neutrality will be achieved in accordance with the latest guidance and nutrient budget calculator provided by Natural England or local calculator (if subsequently approved). Non-standard proposed mitigation techniques will require evidence of their effective use elsewhere and/or utilisation of Natural England Discretionary Advice Service.

### **Protection of Beer Quarry Cave SAC bat pinch points between Seaton and Colyford, and between Colyford and Colyton**

In order to protect the pinch points and secure their long-term suitability for the SAC bat species, the council will not support any applications which reduce the quality or functionality of the bat foraging and commuting habitats within these pinch points, such as through hedgerow\tree loss and adverse impacts from lighting. The objective is for these pinch points to be retained in perpetuity and enhanced where possible in order to guard against potential future development pressure.

### **Vehicle emission impacting on designated sites**

Development will not be permitted where there is potential for increased vehicle numbers, applying a precautionary approach, resulting in increases of emissions of nitrogen oxides (NOx) and/or ammonia (NH3), from internal combustion engine vehicles, to exceeding threshold levels of harm to designated sites (specifically the Pebblebed Heaths).

## **Justification for policy**

- 13.13. As a Competent Authority, the planning authority must carry out Habitats Regulations Assessments (HRA) under the Conservation of Habitats and Species Regulations 2017. East Devon contains seven habitats sites of international importance, including the Exe Estuary SPA and East Devon Pebblebed Heaths SAC.
- 13.14. All plans and projects not directly connected with the conservation management of a habitats site require an HRA Screening to assess potential significant effects. If significant effects cannot be excluded, an Appropriate Assessment must be conducted, consulting Natural England. Planning permission will only be granted if adverse effects on the site's integrity are ruled out or if there are imperative reasons of overriding public interest with adequate compensation.
- 13.15. Hedgerows, particularly in East Devon, are valuable biodiversity resources often threatened by development. Devon has the largest hedgerow network in England, with East Devon's hedgerows being particularly old and ecologically rich. Protecting and enhancing these features is crucial. The policy promotes the translocation of hedgerows over destruction, ensuring better quality and retention of ecological niches.

- 13.16. The South-East Devon European Sites Mitigation Strategy (SEDESMS) ensures that residential and non-residential developments within 10 km of the Exe Estuary or Pebblebed Heaths provide necessary mitigation. This includes on-site and off-site measures such as wardening, education, access changes, habitat improvements, and Suitable Alternative Natural Green Space (SANGS). SANGS must provide 8 hectares of open space per 1,000 new residents and be appealing to dog walkers.
- 13.17. To preserve the East Devon Pebblebeds Heath, new residential uses within 400 metres of the SPA are prohibited. Mitigation must be provided in perpetuity, with developer-led SANGS implemented before development occupancy. The council may use Compulsory Purchase Order powers to ensure land availability for SANGS. Monitoring will ensure mitigation keeps pace with development to protect the integrity of European sites.



FIGURE 13 Low tide on the Exe Estuary/the sea

- 13.18. **River Axe SAC:** The River Axe SAC is impacted by poor water quality due to increased phosphate levels. Proposals increasing phosphate levels require HRA, with mitigation secured in perpetuity. This includes new residential units and overnight accommodation. The River Axe HRA Mitigation Strategy will address these issues, following the mitigation hierarchy and a precautionary approach.

- 13.2 **Beer Quarry Caves SAC Pinch Points:** Semi-natural habitats between Seaton, Colyford, and Colyton are crucial for bat species from the Beer Quarry and Caves SAC. Development in these pinch points could severely impact bat movement and foraging. The Beer Quarry and Caves HRA guidance<sup>25</sup> provides specific requirements for developments in these zones.
- 13.19. **Vehicle Emissions Impacting Designated Sites:** Atmospheric nitrogen deposition affects the East Devon Pebblebed Heaths, leading to vegetation changes and adverse impacts on fauna. Development increasing traffic and emissions will not be permitted without mitigation<sup>26</sup>. Monitoring will ensure other designated sites, including the River Axe, are protected from similar impacts.

## Biodiversity Net Gain

- 13.3 Biodiversity net gain is the principle that the net result (the end position) after development has occurred is that the biodiversity or wildlife value is greater than that of any site that is being developed. The Government support biodiversity net gain and in East Devon we recognise the importance and are seeking to exceed minimum national levels.

### Policy – PB05: Biodiversity Net Gain

Major development<sup>27</sup> proposals will need to deliver biodiversity net gain (BNG) of at least 20% to be calculated using the most up-to-date statutory metric. Where there is a demonstrable viability problem to achieve this target, it will be expected that all measures to exceed the national minimum requirements are made, and evidence for not achieving the 20% target is provided in full. Non-major developments will be required to secure at least 10% BNG.

<sup>25</sup> Beer Quarry and Caves (SAC) Habitats Regulation Assessment (HRA) Guidance, updated 2024: <https://eastdevon.gov.uk/planning/beer-quarry-and-caves-sac-guidance/>

<sup>26</sup> Site Improvement Plan: East Devon Heaths (SIP070): <https://publications.naturalengland.org.uk/publication/6234004760035328>

<sup>27</sup> The Town and Country Planning (Development Management Procedure) (England) Order 2010: <https://www.legislation.gov.uk/uksi/2010/2184/article/13/made>

All applications subject to biodiversity net gain will need to be supported by a Biodiversity Gain Statement which clearly demonstrates how the biodiversity gain hierarchy has been followed. The statement will need to be supported by a completed biodiversity metric (including condition assessment sheets) and demonstrate how BNG will be delivered in accordance with good practice principles for development<sup>28</sup>, BS 8683:2021<sup>29</sup>, and local guidance (or subsequently updated guidance). Any development proposal including significant onsite gains will need to include a Habitat Management and Monitoring Plan (HMMP) and be clear in terms of how habitats will be maintained, appropriately monitored, and reported for 30 years. The statement should provide the expected balance of any off-site gains and whether the use of statutory biodiversity credits is expected.

Where offsite habitats are created or enhanced to deliver BNG, in full or in part, the delivery should be provided within the locality of the impact and contribute to ecological networks and published strategies in accordance with BNG principles. Offsite habitat delivery should prioritise the recovery of ecological networks, priority habitats, and contribute to the aims and objectives of the Local Nature Recovery Strategy (LNRS), and other locally published plans, policies, and strategies including the Clyst Valley Regional Park, Tree, Hedge, and Woodland Strategy for East Devon, and the East Devon Nature Recovery Plan.

Where there is evidence of deliberate habitat degradation on development sites prior to the submission of planning applications, a precautionary view in terms of the habitat distinctiveness and condition will be assumed unless there is evidence to support a lower categorisation.

Developments exempt from mandatory BNG are required to deliver ecological enhancements commensurate with the scale of development. Self-build developments will be required to provide a completed statutory biodiversity metric to evidence their baseline ecological value and the predicted ecological outcome of the development.

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<sup>28</sup> Biodiversity Net Gain: Good practice principles for development, 2016: <https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf>

<sup>29</sup> BS 8683:2021 Process for designing and implementing biodiversity net gain, 2021: <https://knowledge.bsigroup.com/products/process-for-designing-and-implementing-biodiversity-net-gain-specification?version=standard>



## **Justification for inclusion of policy**

- 13.20. The Environment Act 2021 requires development proposals to achieve a minimum 10% BNG. This is crucial in addressing the ecological emergency, with wildlife populations declining globally and many species facing extinction. In the UK, habitat degradation and fragmentation are significant threats.
- 13.21. The Lawton Report (2010) emphasized the need for large-scale habitat restoration to create a resilient ecological network. BNG contributes to sustainable development, climate impact mitigation, and improved mental health and well-being.
- 13.22. East Devon has diverse but fragmented habitats. The council aims to enhance biodiversity by increasing habitat areas, improving quality, and connecting isolated habitats. The Nature Recovery Declaration (2023) commits to exceeding the 10% BNG target, recognizing the link between biodiversity and climate crises.
- 13.23. Recent evidence suggests that a 10% BNG target without species management provides negligible gains. Therefore, the council applies the precautionary principle to ensure effective biodiversity gains. Increasing BNG to 20% is feasible and necessary for significant ecological benefits.
- 13.24. Habitat bank proposals in East Devon indicate the potential to deliver substantial biodiversity units. Significant growth in the district, including a new town, requires large open-space habitats to offset development impacts. BNG can be integrated with Suitable Alternative Natural Greenspace (SANG) and other mitigation measures.
- 13.25. BNG delivery opportunities also exist through nutrient neutrality and Landscape Recovery schemes. The 20% BNG policy will apply to major development proposals, ensuring meaningful biodiversity enhancements.

## **Local Nature Recovery Strategy and Nature Recovery Network**

- 13.4 Local nature recovery is the concept that environmental quality and biodiversity can be enhanced by improving areas for wildlife and creating green links between habitats to allow wildlife value to be enhanced and increase. This policy supports proposals that enhance existing Nature Recovery Network (NRN) features, expand NRN areas, and increase landscape-scale connectivity of ecological features.

## Strategic Policy – PB06: Local Nature Recovery Strategy and Nature Recovery Network

Proposals which result in enhancement of existing NRN features, expansion of existing features within NRN areas, and increase landscape scale connectivity of ecological features within NRN areas will be supported.

Biodiversity net gain (BNG) delivery within NRN areas, those meeting the aims and objectives of the East Devon Nature Recovery Plan, Clyst Valley Regional Park, and identified in Devon guidance are considered important for nature recovery within the district. BNG delivery in these areas is therefore formally identified as being in an area of strategic significance within the Statutory Biodiversity Metric Calculation Tool<sup>30</sup> until the Local Nature Recovery Strategy (LNRS) is formally adopted. Once adopted, the LNRS will define high strategic significance used within the Statutory Biodiversity Metric Calculation Tool. NRN areas will still be considered important for nature recovery.

### Justification for inclusion of policy

13.26. The Environment Act 2021 mandates a Local Nature Recovery Strategy (LNRS) for each area in England. Devon County Council is responsible for delivering the LNRS, with input from local authorities like East Devon District Council (EDDC). The LNRS includes biodiversity priorities and a local habitat map, forming the Nature Recovery Network (NRN).

13.27. The LNRS and NRN aim to implement the Lawton Report's principles of creating "bigger, better, and more joined-up" ecological networks. This involves improving, expanding, and connecting habitats to enhance ecological resilience and focus nature recovery efforts.

13.28. The LNRS outlines:

- Biodiversity descriptions of the strategy area.
- Opportunities for biodiversity recovery and enhancement.
- Priority habitats and species for recovery.
- Measures to achieve these goals.

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<sup>30</sup> How is Biodiversity Net Gain Measured? 2024:

<https://eastdevon.gov.uk/planning/biodiversity-net-gain/how-is-biodiversity-net-gain-measured/>



13.29. The NRN map combines existing wildlife sites and extends habitats based on geology and soil conditions to identify focus areas for nature recovery. Key sites include SACs, SPAs, Ramsar sites, SSSIs, MCZs, NNRs, LNRs, County Wildlife Sites, special verges, ancient woodlands, and habitats of principal importance under the NERC Act 2006.

## **Design feature for wildlife enhancement**

13.30. This policy promotes wildlife enhancement in new developments by requiring features that support biodiversity, such as bird and bat boxes, hedgehog-friendly fencing, and suitable nesting sites.

### **Policy – PB07: Ecological enhancement and biodiversity in the built environment**

In addition to features required as part of biodiversity net gain, mitigation or compensation, all proposals are required to incorporate features of biodiversity value tailored to the specific proposals, relevant local receptors and in accordance with best practice to maximise potential benefits.

#### **As a minimum, the following features are required within new proposals:**

- a. Integrated bird boxes (e.g., swift bricks) in suitable locations at a ratio of one per dwelling, or a relevant number to be agreed with EDDC for flats or non-dwelling applications, to be provided in accordance with BS42021:20221.
- b. Provision of integrated bat boxes in locations suitable for use by bats (i.e., adjacent to suitable habitats and not significantly impacts by artificial lighting).
- c. An integrated bat loft within all major planning applications, if ecologically relevant (i.e., if the site is a suitable location for a bat loft be constructed - not too isolated or within unsuitable habitat such as heavily urbanized well- lit areas).
- d. Gaps (13 cm x 13 cm) in the bases of garden fences (between gardens, and within fences between gardens and wider ecological networks, to facilitate movement of hedgehogs and other protected and notable species).

e. Provision of overhanging eaves suitable for nesting house martins in all major development

The location and specification of biodiversity features should be designed with input from a qualified ecologist and informed by the most up to date research and guidance at the time of application. Bat and bird boxes should be integrated within the fabric of the building to ensure longevity and retention when ownership changes (i.e., to avoid removal by new owners).

### Justification for inclusion of policy

- 13.31. Significant development growth in East Devon will increase pressure on the natural environment but also offers opportunities for nature recovery. This policy supports the biodiversity objective of the Environment Act 2021 and is crucial for the recovery of species like swifts, which are currently in decline.
- 13.32. Paragraph 185b of the NPPF<sup>31</sup> emphasizes enhancing ecological networks and recovering priority species. This policy aligns with these goals by requiring features that benefit priority species, such as birds, bats, reptiles, and hedgehogs, which can thrive in urban environments if provided with suitable habitats.
- 13.33. The BS42021:2021 guidance highlights the high occupancy rates of integrated bird boxes, endorsed by the RSPB and major housing developers. EDDC supports this guidance and promotes its use district-wide.
- 13.34. Ongoing research and guidance from organizations like the National House Building Council and the UK Green Building Council provide cost-effective measures for integrating biodiversity into the built environment. These measures require minimal maintenance and contribute significantly to nature recovery.

### Additional Features for Wildlife Enhancement:

- Reptile/amphibian hibernacula
- Brash and log piles

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<sup>31</sup> National Planning Policy Framework, Dec 2023, para 185b:  
[https://assets.publishing.service.gov.uk/media/669a25e9a3c2a28abb50d2b4/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/669a25e9a3c2a28abb50d2b4/NPPF_December_2023.pdf)

- Invertebrate bricks and bee hotels
- Water butts
- Wildlife ponds
- Sustainable urban drainage systems (e.g., swales and pools with native vegetation)
- Native hedge planting
- Swift/wildlife towers and green roofs
- Barn owl lofts
- Bat, bird, and dormouse boxes in trees and hedges

13.35. These features should be designed with input from qualified ecologists and integrated into the building fabric to ensure longevity and retention.

## Trees in East Devon

13.36. Trees, woodlands, and hedges are vital for enhancing landscapes, providing wildlife habitats, supporting sustainable drainage, sequestering carbon, and improving public health.

### Policy – PB08: Tree, Hedges and Woodland on Development Sites

#### Retention of existing trees and hedges

All development will retain good quality and healthy woodland, trees and hedgerows, including: ancient woodland; ancient and veteran trees; those with visual amenity value; those that support wildlife (such as some appropriate U category trees as part current BS 5837<sup>32</sup>) or provide habitat connectivity; those which positively contribute to local landscape character, the historic environment or the significance of a heritage asset and its setting; and rare or unusual species of trees. These will be incorporated into the overall design and landscape scheme, within public spaces where possible.

Where justifiable and unavoidable tree and hedge losses occur, these will need to be adequately compensated for on the development site or on publicly accessible land in accordance with the minimum compensation requirements for trees listed

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<sup>32</sup> BS 5837:2012 Trees in relation to design, demolition and construction. Recommendations, 2012: <https://knowledge.bsigroup.com/products/trees-in-relation-to-design-demolition-and-construction-recommendations?version=standard&tab=history>

in the Table below. This replacement policy also applies to trees with Ash dieback on development sites.

### Tree protection on development sites

All development proposals where trees and native hedges are present, or where trees outside of the boundary are within the root protection zone of the development boundary, will need to be informed by British Standard BS 5837 Trees in relation to design, demolition and construction (or the most up

Trunk diameter of tree lost to development (cm measured at 1.5 m)	Number of replacement trees <sup>33</sup>
7 – 19.9	1
20 – 29.9	2
30 – 39.9	3
40 – 49.9	4
50 – 59.9	5
60 – 69.9	6
80+	7

to date version), the recommendations of which will be taken fully into account in the scheme design.

The planning application will be accompanied by a detailed appraisal of their condition, location, and ecological and landscape significance both at the time of the application and with an assessment of their potential future value. Applications should include an arboricultural method statement and tree protection plan to be followed during construction, reflecting the latest

<sup>33</sup> Based on the Bristol Tree Replacement Standard (BTRS) See: Supplementary planning documents and other planning guidance - Bristol Tree Replacement Standard: <https://www.bristol.gov.uk/residents/planning-and-building-regulations/planning-policy-and-guidance/supplementary-planning-documents-practice-notes-and-other-planning-guidance>

arboricultural standards for any tree works or development near to trees and demonstrating appropriate root protection areas.

Where woodland, trees and hedges are to be removed they should be accurately identified, with a clear justification set out for their loss, together with details of any mitigation or replacement planting as part of an overall approach to achieving biodiversity net gain. Development proposals that have not properly considered or prioritised development options enabling the retention of woodlands, trees and hedgerows will be refused.

No building, hard surfacing, drainage or underground works will be permitted that does not accord with the principles of BS 5837 or Volume 4 National Joint Utilities Group (NJUG) Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees – Issue 2 (or the current revision or any replacement) unless, exceptionally, the Council is satisfied that such works can be accommodated without harm to the trees concerned or there are overriding reasons for development to proceed.

To avoid issues with subsidence all developments, including permitted development, will require appropriate depth of foundations considering local soil geology and water demand of nearby trees at full maturity in accordance with current industry guidance.

### **Provision of new trees and hedgerows on development sites**

The provision of new trees and hedges shall be based on the principles outlined in the Devon Tree Strategy, the Tree, Hedge, and Woodland Strategy for East Devon, Devon County Right Tree Right Place Guidance, and New Devon Hedges and relevant guidance. Tree planting design and maintenance should:

- Take into account climate change and local landscape characteristics. Planting material should be sourced in accordance with the national strategy for biosecurity;
- Allow sufficient space for existing and newly planted trees to grow to maturity, both above and below ground;
- Ensure that any new streets are, where possible and it is commercially viable and it would not compromise other compelling design or operational highway considerations, tree-lined and residential areas and development sites as a whole will

contribute towards 30% tree cover target for urban areas within the District.

- Use large canopy tree species within new development as these provide the greatest benefits for increasing canopy cover, providing shade, intercepting rainfall and increasing biodiversity.

Within or adjacent to areas of paving where available soil volumes are likely to be restricted, technical solutions should be used to ensure that adequate soil volume and suitable growing conditions are provided, such as water infiltration, drainage and aeration, to enable new trees to establish and reach maturity as per industry best practice. These solutions must also prevent soil compaction and provide a load bearing capacity sufficient for the task for which the surface is designed for.

### **Policy PB09: Monitoring requirements for new planting schemes**

Appropriate measures to ensure that new planting schemes are implemented in accordance with the approved details and to secure their long-term management and maintenance will be required including arrangements for monitoring. For major developments this will also require the placement of a financial bond by the developer prior to the commencement of construction, equal to 25% of the calculated planting cost for the scheme, or agreed phase, to be released on fulfilment of the following to the satisfaction of the planning authority:

- Within 1 month of the completion of planting works, the issue of a signed certificate by the developer's landscape architect or other appropriately qualified/experienced professional consultant confirming that the planting works have been overseen by them and completed in accordance with the approved details.

For years 1-5 thereafter, the issue of an annual inspection report by the developer's landscape architect confirming that maintenance of the scheme has been carried out in accordance with the approved details and identifying any plant failures or other defects that require rectification together with a program for their implementation at the earliest opportunity. The annual certificate shall also confirm the satisfactory rectification of any defects identified during the previous year's inspection.

## Justification for inclusion of policy

- 13.37. Trees, woodlands, and hedges are crucial green infrastructure assets that enhance landscapes, provide wildlife habitats, support sustainable drainage, sequester carbon, and improve public health. New developments must incorporate existing natural features early in the design process and include new plantings to create pleasant spaces and future mature trees. Protection and management during development are essential for their long-term health.
- 13.38. Planning applications must demonstrate how they meet policy requirements regarding trees, woodlands, and hedges. In cases of exceptional loss of ancient woodlands or veteran trees, compensation strategies such as planting new native woodlands or improving nearby habitats are required.
- 13.39. This policy supports the Tree, Hedge, and Woodland Strategy for East Devon, promoting the creation of new green spaces that benefit wildlife and public health.

## The Dorset and East Devon Coast World Heritage Site

- 13.40. Most of the East Devon coastline is part of the Jurassic Coast World Heritage Site, recognised for its exceptional geological importance..

### Policy – PB10: Protection and Enhancement of the Jurassic Coast World Heritage site

Development within the Jurassic Coast World Heritage site, or that could adversely impact on its setting, will only be permitted if it can be demonstrated that the Outstanding Universal Value of the coastline and specifically its geological importance, will not be adversely affected.

Development proposals that could give rise to adverse impacts, will be assessed in respect of:

- The setting and importance of the world heritage site;
- The inherent attributes and geological qualities of the site, specifically relating to its ‘Outstanding Universal Value’;
- The grounds and reasons for its inscription; and

- Its overall integrity (including possible incremental loss) and local impacts of development.

The international importance of the site and its setting is such that development proposals will be rigorously reviewed in determination of planning applications and this policy will sit alongside other affording coastal and countryside protection and enhancement.

### **Justification for inclusion of policy**

- 13.41. The Jurassic Coast, inscribed as a World Heritage Site by UNESCO in 2001, is globally significant for its geology, fossils, and landforms. It is England's only natural World Heritage Site, extending from Orcombe Point at Exmouth to Old Harry Rocks near Swanage, Dorset.
- 13.42. The Jurassic Coast Partnership Plan (2020-2025) identifies the site's Outstanding Universal Value (OUV), including its stratigraphy, palaeontological record, geomorphological features, and ongoing scientific importance. The high rate of erosion is a key characteristic, maintaining dynamic rock exposures.
- 13.43. Development proposals within or impacting the site must demonstrate no adverse effects on its OUV. The policy ensures rigorous assessment of such proposals to protect the site's integrity and significance. The majority of the site falls within the East Devon National Landscape area, emphasizing its importance.
- 13.44. This policy aligns with the Jurassic Coast Partnership Plan, promoting geodiversity and public enjoyment of the site while safeguarding its geological heritage.

### **Sites designated for their geological importance**

- 13.45. This policy protects nationally designated geological sites, such as Sites of Special Scientific Interest (SSSIs), from adverse impacts of development.



## **Policy – PB11: Protection of designated geological sites**

Proposals and plans that would cause a direct or indirect adverse effect upon nationally designated geological sites will not be permitted unless all of the following criteria are met:

- a. They cannot be located on alternative sites that would cause less or no harm.
- b. The public benefits of the proposal clearly outweigh the impacts on the features of the site and the wider network of natural habitats and designated sites.
- c. Suitable avoidance, mitigation and compensation measures are proposed, in accordance with the mitigation hierarchy.
- d. the integrity of the site is maintained.

### **Justification for inclusion of policy**

13.46. Geological sites are designated for their scientific and educational value, often supporting wildlife interests. The underlying geology can determine the presence and value of wildlife species. Some sites are designated as SSSIs for both geological and wildlife value. This policy complements existing legislation and government guidance, detailing when adverse impacts may be permitted.

### **Regionally Important Geological and Geomorphological Sites**

13.47. This policy protects Regionally Important Geological and Geomorphological Sites (RIGS) from adverse impacts of development, ensuring their scientific and educational value is maintained.

## **Policy – PB12: Regionally Important Geological and Geomorphological Sites**

The granting of planning permission for development or land-use changes that may have an adverse effect, either directly or indirectly, on Regionally Important Geological and Geomorphological Sites will only be permitted if the justification for the proposed development clearly outweighs any harm to the intrinsic scientific or educational value of the site.

Where development is permitted mitigation will be required to minimise the negative impacts and where this is not possible adequate compensatory enhancement or new site creation schemes will be required.

### **Justification for inclusion of policy**

- 13.48. RIGS are important for their geological significance in Devon. Established by the Devon Regionally Important Geological and Geomorphological Sites Group, these sites are valuable educational, historical, and recreational resources. The selection criteria include educational use, scientific study, historical importance, and aesthetic value.
- 13.49. RIGS often result from development processes, exposing geological features. Recognising these sites as County Geological Sites helps avoid activities that might damage their geological value. Development proposals should consider how to showcase geological features in an informative way.

## Chapter 14. Open Space and Sports and Recreation

### The importance of open space and sport and recreation facilities

- 14.1. Access to open spaces is crucial for mental and physical wellbeing. While East Devon has many high-quality open spaces, not everyone has easy access to them. This policy aims to align open space and recreation provision with new development and address current deficits.

#### Strategic Policy – OS01: Access to open space and recreation facilities

Support will be given for the provision of new and enhanced high quality open spaces and access to existing spaces and to sports and recreation facilities.

A key consideration in accommodating new development will be to ensure that residents, visitors to or users of any new scheme must be able to access open spaces and sports facilities and enjoy the benefits that such spaces and facilities offer. Such an outcome will require that availability of space and safe and easy access to it for all. At the outset of designing any development proposal full account must be taken of the open space and sports facilities it will generate; high-quality provision must be designed in at the outset.

Qualitative (how good it is) and quantitative (how much there is of it) assessments of open space provision, in respect of what exists now and what is planned will be determining considerations in the decision-making process. Securing planning permission for development will require meeting and ideally exceeding minimum specified standards of provision.

#### Justification for policy

- 14.2. Open spaces serve both informal activities, like walking, and formal sports. However, some areas, especially urban ones, lack sufficient facilities. The

Council's Leisure Strategy (2022)<sup>34</sup> and the upcoming Playing Pitch Strategy (2025) will guide improvements and new provisions. The new Playing Pitch strategy will assess availability, access and use of pitches used for football, cricket, hockey, rugby and tennis.

- 14.3. Assessment of existing and planned open spaces will be key in decision-making, ensuring developments meet or exceed minimum standards. This policy helps protect existing facilities and supports the creation of new ones, enhancing public health and wellbeing.



FIGURE 14 Playing pitch at Ottery St Mary

### **Quantified open space standards applicable for new development**

- 14.4. New developments, especially housing, must have access to appropriate levels of open space or contribute to new provision to avoid shortfalls. This policy sets quantified open space standards based on Fields in Trust guidelines.

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<sup>34</sup> East Devon District Council Leisure Strategy 2021-2031, 2022:  
<https://eastdevon.gov.uk/media/fvwb1cy5/east-devon-district-council-leisure-strategy-final-15-06-22.pdf>

## Policy – OS02: Land and buildings for sport, recreation and open space areas in association with development

Planning permission for new housing development, in line with the size thresholds set out below, will be required to make open space provision in line with Fields in Trust derived standards as tabled in this policy:

- 9 dwellings or less will not be required to provide any specific open space typologies on-site, however developers may choose to make such provision.
- 10 – 49 dwellings will be required to provide (A) amenity open space on-site as per the standards below.
- 50 – 199 dwellings will be required to provide (A) amenity open space, and (B) children’s and youth play space on-site as per the standards below.
- 200 + dwellings will be required to provide for all open space typologies either on-site or off-site as per the standards below.

Open space type	Quantity guideline (hectares per 1,000 population)	Maximum walking guideline distances from dwellings
(A) Amenity green space	0.60	480 metres
(B) Equipped / designated play areas	0.25	100m - LAPs, 400 – LEAPs and 1,000m – NEAPs
Parks and gardens	0.80	710 metres
Natural and semi natural green space	1.80	720 metres
Playing pitches	1.20	1,200 metres
Other outdoor pitch space	0.40	1,200 metres

Other outdoor provision	0.30	700 metres
Allotments	0.23	1,200 metres

Counting in availability of existing and new provision set out in these standards, and any additional wider accessible green space, all developments should also seek to ensure that there is or will be:

- A Doorstep Accessible Greenspace of at least 0.5ha within 200 metres (under 5 mins walk), or a
- A Local Accessible Natural Greenspace of at least 2ha within 300 metres (5 mins walk from home)

For developments of over 300 dwellings there should be, or there should be provided, a medium sized Neighbourhood Accessible Natural Greenspace of at least 10ha) within 1km (15 minutes’ walk from home). For developments of over 1,000 this rises to 20 hectares within 2km.

Accessible Natural Greenspaces can contribute towards other functions such as Suitable Alternative Natural Greenspace (SANG) or Biodiversity Net Gain. New developer provided open space will typically be required on site, unless off-site provision is of greater benefit.

New open space will be required unless existing available open space, measured from any proposed dwelling/s in the proposed scheme, and taken in combination with need generated by the proposed new development, exceeds standards for each typology. Existing open space will be assessed on the basis of an East Devon population density of 2.26 residents per household as derived from the 2021 census.

New development requirements will be based on assumed minimum occupancy rates as follows:

- 1 bedroom dwelling = 1.5 persons,
- 2 to 4 bedroom dwelling = 2.26 persons,
- 5+ bedroom dwelling = 2.5 persons.

Major developments for non-residential uses will need to make space provision of a level that is proportionate to needs arising from the development in question.

**Open space provision will be required unless:**

- a. it is clearly demonstrated that the proposed housing development will provide for a different resident population level than the above or clearly differing needs, in which case moderation of standards may be appropriate; or
- b. the most meaningful contribution is generated by providing only certain types of space provision, this may be specifically relevant where need generated does not provide sufficient land to meet site size thresholds for a given use; or
- c. substantive typologies of or more open space types are present, or will be provided, and they will provide an alternative better overall open space provision.

**Justification for inclusion of policy**

- 14.5. New developments, especially those increasing the population, create a need for additional facilities unless there is already a surplus. This policy requires new facilities to meet the needs generated by development, primarily housing but also other types that affect local populations, such as commercial projects.
- 14.6. The policy aims to deliver new open spaces and enhance existing ones alongside residential development. Specialist accommodations, like those for the active elderly, will be assessed similarly, with adjustments for specific needs. Funds from this policy may be pooled to support public open space projects.

**Location for new facility provision**

- 14.7. This policy supports the provision of new and enhanced open spaces, sports facilities, and allotments within or near urban areas, ensuring they are accessible and compatible with neighbouring uses.

## **Policy – OS03: Location of facilities for sport and recreation, open spaces and allotments**

Within or adjoining urban or built-up areas, planning permission will be granted for new open space areas, allotments, sports facilities and parks and gardens or for the upgrading or enhancement of existing facilities provided that unacceptable adverse amenity or environmental impacts do not arise from development.

Any new or enhanced provision should be readily accessible to all people with a particular emphasis attached to ensuring safe pedestrian and cycle accessibility. Any built development associated with new facilities should be proportionate in scale or kind to the facilities that exist or are to be provided and where possible close by to existing built development.

### **Justification for inclusion of policy**

14.8. New facilities and open spaces should typically be accommodated within development sites, especially larger ones, and be integrated into detailed design proposals. They should be accessible to nearby residential populations and centres, avoiding adverse impacts. While new facilities are generally expected to be close to built-up areas, less formal open spaces can be more flexibly located with minimal adverse impacts.

### **New allotments and avoiding the loss of existing ones**

14.9. This policy supports the creation of new allotments and protects existing ones, ensuring they are well-located and avoid adverse impacts.

## **Policy – OS04: New allotments and avoiding the loss of existing ones**

New allotments will be granted planning permission where they are well related to settlements and will avoid adverse environmental or amenity impacts.

Planning permission will not be granted for developments that would result in the loss of existing allotments unless at least one of the tests set out below is satisfied:



A development proposal will create a new provision that is equal to or better than that being lost: or

There is a demonstrable over-supply, and an over-supply that can be shown to persist in respect of past patterns and future projections of need, in the Parish/town in which the allotment is located.

- 14.10. Allotments are valuable community assets, especially in urban areas with small gardens. The council supports new allotments based on local needs. Development proposals resulting in the loss of allotments must either provide equal or better replacements or demonstrate a persistent over-supply in the area.
- 14.11. Demand for allotments has increased, making them important for local communities. Loss of allotments is rare and only acceptable if replaced with equal or better alternatives, considering factors like cost, accessibility, and quality of growing conditions.

### **Sport and recreation facilities in the countryside**

- 14.12. This policy supports the provision of outdoor recreation facilities in the countryside and on the coast, ensuring they are appropriately scaled and located.

### **Policy – OS05: Leisure and recreation developments in the countryside**

Planning permission will be granted for outdoor recreation facilities in the countryside and on the coast provided that the nature of the activities undertaken or the space requirements of the proposal require a countryside or coastal location and all of the following tests are met:

The facilities or development proposals are in scale with the character, environmental characteristics and setting of the area and do not conflict with countryside, nature or landscape policies, nor detract from the amenities of the area.

The proposals provide for safe and convenient pedestrian and cycling access and discreet parking arrangements, particularly in environmentally sensitive areas.

On site facilities are appropriate to meet the needs of the proposal and links with adjacent footpaths and bridleways should be suited to any proposed site uses.

Development should not result in net adverse natural environmental impacts and ideally should generate improvements.

The clear policy expectation is that low impact uses only will be accommodated and such uses should be for countryside related activities.

Any building work should be small scale and subservient to wider site use and where possible existing building reuse rather than new development should take place,

Any new buildings and necessary extensions should be limited in scale and be in close proximity to existing groups of buildings or an existing settlement.

Where it is proposed to extend or intensify an existing use the proposals and any net cumulative additional impacts will be considered in the context of and be required to be compatible with all of the above.

## **Justification for inclusion of policy**

14.13. The changing nature of agriculture and the need for rural diversification highlight the importance of outdoor recreation facilities in the countryside. These developments can improve despoiled environments, create wildlife habitats, and provide appealing destinations. However, they must be carefully managed to avoid significant visual impacts on the landscape.

14.14. Activities like horse riding are encouraged if they can be safely accommodated without harming the countryside. Dwellings in the open countryside are not justified based on recreational needs. This policy ensures that new facilities are in scale with their surroundings, provide safe access, and ideally generate environmental improvements. Any new buildings should be small-scale, reuse existing structures where possible, and be close to existing settlements.

## Chapter 15. Our Outstanding Historic Environment

- 15.1. A heritage asset, as defined by the NPPF, is any building, monument, site, place, area, or landscape with heritage interest significant enough to influence planning decisions. This includes both designated and locally identified assets.
- 15.2. East Devon boasts a rich heritage with distinctive architecture, including Scheduled Monuments, Listed Buildings, Conservation Areas, and more. These assets contribute to the district's unique character and include both man-made structures and natural landscapes shaped by human interaction.
- 15.3. National policy highlights the importance of conserving heritage assets for their contribution to quality of life. Local authorities must develop strategies for their conservation and enjoyment, focusing on assets at risk.
- 15.4. The East Devon Heritage Strategy (2024-2042) guides policy implementation, detailing the district's heritage and setting objectives for its preservation. This strategy includes broader designations like National Landscapes, which enhance heritage management.
- 15.5. Non-designated heritage assets, identified by local authorities, also hold significant value and should be considered in planning decisions. These assets require balanced judgement regarding any potential harm or loss, ensuring their conservation aligns with their significance.

### Historic Environment

- 15.6. This policy ensures new developments consider the significance of heritage assets, promoting their conservation and viable use while enhancing local character and distinctiveness.

#### Strategic Policy – HE01: Historic Environment

Proposals for new development that may affect heritage assets should take account of the desirability of sustaining and enhancing the significance of those assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

the desirability of new development making a positive contribution to local character and distinctiveness.

Particular encouragement will be given to schemes that will help secure the long term conservation of at-risk, vacant and/or under-used buildings and bring them back into appropriate use.

Non-designated heritage assets, where identified through local or neighbourhood plan-making, the Local List, Conservation Area Appraisal or review or through the planning application process, will be recognised as heritage assets in accordance with national guidance and any local criteria. Development proposals that directly or indirectly affect the significance of a non-designated heritage asset will be determined with regard to the scale of any harm or loss and the significance of the asset.

Applicants will be required to describe, in line with best practice and relevant national guidance, the significance of any heritage assets affected including any contribution made by their setting. The level of detail should be proportionate to the asset's importance. In some circumstances a planning condition will require further survey, analysis and/or recording.

Alterations to historic buildings, for example to improve energy efficiency or reduce carbon emissions, should respect the integrity of the historic environment and the character and significance of the building.

## Justification for inclusion of policy

- 15.7. Heritage assets, both designated and non-designated, are crucial to East Devon's character. These include Listed Buildings, Scheduled Monuments, Conservation Areas, and more. Most heritage assets lack statutory designation, relying on the planning system and positive management for conservation.
- 15.8. Applicants should use resources like the Devon Historic Environment Record and local Heritage Impact Assessments to understand the significance of affected heritage assets. Proposals should align with the Heritage Strategy and relevant guidance.
- 15.9. Further surveys and analysis may be required for some applications. Heritage Statements and Impact Assessments should follow best practice and national guidance, such as Historic England's advice notes.
- 15.10. The Council monitors at-risk heritage assets, seeking solutions through discussions with owners and using statutory powers if necessary. Collaboration with stakeholders and support for Neighbourhood Development Plans help protect and enhance the district's heritage.

## Listed Buildings

- 15.11. This policy ensures that any development affecting listed buildings conserves and enhances their heritage significance, respecting their architectural and historic features.

### Strategic Policy – HE02: Listed buildings

Proposals for development, including change of use, that involve any alteration of, addition to or partial demolition of, a listed building or within the curtilage of, or affecting the setting of a listed building will be expected to:

1. conserve, enhance or better reveal those elements which contribute to the heritage significance and/or its setting; and
2. respect any features of special architectural or historic interest, including, where relevant, the historic curtilage or context, such as burgage plots, or its value within a group and/or its setting, such as the importance of a street frontage or traditional shopfronts; and

3. be sympathetic to the listed building and its setting in terms of its siting, size, scale, height, alignment, materials, building methods and finishes (including colour and texture), design and form, in order to retain the special interest that justifies its designation

Development proposals affecting the significance of a listed building or its setting that will lead to substantial harm or total loss of significance will be refused unless, exceptionally, it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that demonstrably outweigh that harm or loss or where the applicant can demonstrate that:

1. the nature of the heritage asset prevents all reasonable uses of the site; and
2. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
3. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
4. the harm or loss is outweighed by the benefit of bringing the site back into use.

Development proposals (including changes of use) that would result in less than substantial harm to the significance of a listed building or its setting will be expected to:

1. minimise harm and avoid adverse impacts, and provide justification for any adverse impacts, harm or loss of significance;
2. identify any demonstrable public benefits or exceptional circumstances in relation to the development proposed; and
3. investigate and record changes or loss of fabric, features, objects or remains, both known and unknown, in a manner proportionate to the importance of the change or loss, and to make this information publicly accessible.

## **Justification for inclusion of policy**

15.12. East Devon has around 4,600 listed buildings and structures, recognised for their national architectural or historic interest. Listing protects both the exterior and interior features, as well as any objects or structures within the

curtilage that have been part of the land since before 1 July 1948. Occasionally, land distant from the building may also be considered part of its setting due to historical or functional associations.

- 15.13. Listed buildings often have features that support roosting bats. Compliance with relevant legislation requires species survey information and ecological conditions for works likely to impact bats. This policy ensures that development proposals conserve and enhance the significance of listed buildings, respecting their special architectural and historic interest.

## Conservation Areas

- 15.14. This policy ensures that development within or affecting Conservation Areas conserves or enhances their special interest, character, setting, and appearance.

### Strategic Policy – HE03: Conservation Areas

Proposals for development within or affecting the setting of a Conservation Area must conserve or enhance its special interest, character, setting and appearance. Development will be expected to:

1. contribute to the Conservation Area's special interest and its relationship within its setting. The special characteristics of the Conservation Area (such as existing walls, buildings, trees, hedges, burgage plots, traditional shopfronts and signs, farm groups, medieval townscapes, archaeological features, historic routes etc.) should be preserved;
2. take into account important views within, into or out of the Conservation Area and show that these would be retained and unharmed;
3. respect the local character and distinctiveness of the Conservation Area in terms of the development's: siting; size; scale; height; alignment; materials and finishes (including colour and texture); proportions; design; and form and should have regard to any relevant Conservation Area Character Appraisal;
4. be sympathetic to the original curtilage of buildings and pattern of development that forms part of the historic interest of the Conservation Area;

5. be sympathetic to important spaces such as paddocks, greens, gardens and other gaps or spaces between buildings which make a positive contribution to the pattern of development in the Conservation Area;
6. ensure the wider social and environmental effects generated by the development are compatible with the existing character and appearance of the Conservation Area; and/or
7. ensure no loss of, or harm to any building or feature that makes a positive contribution to the special interest, character or appearance of the Conservation Area.

Where a proposed development will lead to substantial harm to or total loss of significance of a Conservation Area, consent will only be granted where it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits that outweigh that harm or loss.

Where a development proposal will lead to less than substantial harm to the significance of a Conservation Area, this harm will be weighed against the public benefits of the proposal.

Wherever possible the sympathetic restoration and re-use of structures which make a positive contribution to the special interest, character or appearance of the Conservation Area will be encouraged to prevent harm through the cumulative loss of features which are an asset to the Conservation Area.

## **Justification for inclusion of policy**

15.15. East Devon has 33 Conservation Areas, covering parts of main towns and historic cores of smaller settlements. These areas are designated for their special architectural or historic interest, which legislation seeks to preserve and enhance. Conservation Areas include groups of buildings, open spaces, trees, historic settlement patterns, and archaeological features. Development must preserve or enhance the character of these areas, considering important views, local character, and significant spaces.

## **Archaeology and Scheduled Monuments**

15.16. This policy protects Scheduled Monuments and archaeological remains, ensuring development proposals consider their significance and setting.



## Strategic Policy – HE04: Archaeology and Scheduled Monuments

Development must protect the site and setting of Scheduled Monuments, designated or undesignated archaeological remains, including ancient routeways and milestones.

Applicants will be expected to undertake an assessment of appropriate detail to determine whether the development site is likely to contain archaeological remains. Proposals must show how the development proposals have had regard to any such remains.

Where the assessment indicates archaeological remains on site, and development could disturb or adversely affect archaeological remains and/or their setting, applicants will be expected to:

1. submit an appropriate archaeological desk-based assessment; and/or
2. undertake a field evaluation (conducted by a suitably qualified archaeological organisation), where necessary.

Nationally important archaeological remains (whether scheduled or demonstrably of equivalent significance) should be preserved in situ. Non-designated archaeological sites or deposits of significance equal to that of a nationally important monument will be assessed as though those sites or deposits are designated.

Where a proposed development will lead to substantial harm to or total loss of significance of such remains consent will only be permitted where it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

Where a development proposal will lead to less than substantial harm to the significance of such remains, this harm will be weighed against the public benefits of the proposal.

For other non-designated archaeological remains, the effect of a development proposal on the significance of the remains, either directly or indirectly, will be taken into account in determining the application.

In exceptional cases, where harm to or loss of significance to the asset is considered to be justified, the harm should be minimised, and mitigated by a programme of archaeological investigation, including excavation, recording and analysis. Planning permission may be granted conditional upon a programme of archaeological mitigation agreed with the Council that will be

implemented by an appropriately qualified organisation. Unless otherwise agreed with the Council any development should not commence until the approved archaeological works have been satisfactorily completed. The results of the analysis of findings subsequent to the investigation should be published and made available to the relevant local and county authorities as well as being made publicly accessible..

## **Justification for inclusion of policy**

15.17. East Devon has a significant archaeological heritage, with around 200 Scheduled Monuments legally protected under the Ancient Monuments and Archaeological Areas Act. The Devon Historic Environment Record includes numerous other sites of local interest. Development proposals must assess and consider archaeological remains, preserving nationally important sites in situ. In exceptional cases, harm to or loss of significance must be minimised and mitigated through archaeological investigation and recording. The results should be made publicly accessible to enhance understanding and conservation of the district's archaeological heritage.

## **Historic Landscapes, Parks and Gardens**

15.18. This policy ensures that development proposals conserve or enhance the special historic interest, character, or setting of parks and gardens on the Historic England Register.

## **Strategic Policy – HE05: Historic Landscapes, Parks and Gardens**

Proposals should conserve or enhance the special historic interest, character or setting of a park or garden on the Historic England Register of Historic Parks and Gardens of Special Historic Interest in England.

Any harm to or loss of significance of any heritage asset requires clear and convincing justification. Substantial harm to or loss of these assets should be wholly exceptional in the case of Grade I and Grade II\* Registered Historic Parks and Gardens and exceptional in the case of Grade II Registered Historic Parks and Gardens.

Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, consent will only be granted

where it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. All other options for their conservation or use must have been explored.

A balanced judgment, having regard to the scale of any harm or loss and the significance of the heritage asset, will be required in assessing proposals affecting non-designated historic parks and historic landscapes (including historic routes and battlefields).

Applicants will be required to describe, in line with best practice and relevant national guidance, the significance of any heritage assets affected including any contribution made by their setting. The level of detail should be proportionate to the asset's importance. In some circumstances planning conditions will require further survey, analysis and recording.

## **Justification for inclusion of policy**

- 15.19. Historic landscapes, parks, and gardens are vital parts of East Devon's heritage, comprising open spaces, views, archaeological remains, and designed features like planting and water elements. These sites also hold green infrastructure and biodiversity value. Protecting and sympathetically managing these sites and their settings is essential.
- 15.20. The most significant sites are listed on the Historic England Register of Historic Parks and Gardens and the National Heritage List for England. Additionally, the district has several regionally or locally important sites that should be protected and enhanced where possible. Development proposals must justify any harm to these assets, ensuring substantial public benefits outweigh any loss. Non-designated sites require a balanced judgement based on their significance and the scale of harm or loss.

## Chapter 16. Community Facilities

- 16.1 Thriving communities are reliant on having spaces and buildings to meet and for community-based activities to take place. Without such spaces many communities would not survive and would not provide the support mechanisms that are needed for the health and wellbeing of their residents. Such facilities also form an important resource that promotes social well-being and cohesion – they make space and place for great things to happen.

### Policy – CF01: New or extended community facilities

Encouragement will be given to the provision of new social and community facilities and extension of existing facilities.

Planning permission for new community spaces and buildings or extension to existing, to support (typically non-profit making) community events, gathering and activities, will be granted where all of the tests set out below are satisfied:

Provision will need to be within, adjoining or physically close to, and as such well related, to built-up parts or edges of a recognisable mass of buildings that reasonably constitutes a town, village or settlement (this test would be met in respect of new land allocations in the local plan for development).

Development will be designed to serve local residents. Facilities must be accessible to residents and within safe reasonable walking distance of most potential users of the facility. They will need to be proportionate in scale and size to the needs of that community.

Where possible development proposals must promote the sharing of spaces and facilities with a range of uses and activities typically expected in any development.

### Justification for inclusion of policy

- 16.1. Community facilities like halls, schools, libraries, health centres, and places of worship are vital for social activities. The Council supports expanding or creating new facilities, especially in areas with substantial new development or lacking existing facilities. Multi-purpose buildings accommodating various uses are encouraged.

16.2. The Council also supports the temporary use of residential houses or other appropriate buildings for community activities in the following instances:

- Where there is a perceived demand that needs to be proven before constructing a permanent facility.
- Where a large development is proposed, and a temporary space is needed to establish an embryonic community facility early in the construction process. These temporary uses can serve a 'meanwhile' function until a permanent solution is delivered.

16.3. This approach ensures that immediate community needs are met while planning for long-term, sustainable community facilities.

### **Loss of community facilities**

16.4. This policy aims to prevent the loss of community facilities unless they are no longer needed or viable, or an equivalent replacement is provided.

#### **Policy – CF02: Loss of community facilities**

Planning Permission will not be granted for developments that would result in the full or partial loss or closure of a community facility unless at least one of the tests set out below is met:

the community facility (in full or part) is no longer needed by the community or cannot be financially viably sustained or made to be viable. To meet this policy test planning applications that would result in a full or partial loss must be accompanied by both an:

1. assessment, over a shorter and longer term, that demonstrates that a need no longer exists, and
2. a financial viability assessment and demonstration of active marketing that clearly shows that in current or alternative modified community use or different models of ownership, over a shorter and longer term, the facility cannot be sustained.

an alternative facility is in a pedestrian accessible location to the local community (of equivalent or better accessibility as that to be lost) and is of equal or higher community value is being provided as an explicit replacement for the lost facility.

## **Justification for inclusion of policy**

- 16.5. Community facilities are essential, and their loss should be avoided unless they are clearly not needed, not used, or surplus to requirements. Proposals resulting in the loss of facilities must demonstrate a lack of need or viability through assessments and active marketing. Alternatively, an equivalent or better replacement facility must be provided in an accessible location. This policy ensures that community needs continue to be met and facilities remain available for public use.

# Chapter 17. Implementation and Monitoring

## Infrastructure Provision

- 17.1. Delivering infrastructure alongside housing and economic development is crucial for sustainable communities. This includes essential services like transport, flood risk measures, utilities, and habitat mitigation, as well as daily access to education, health, open spaces, and play areas.
- 17.2. Infrastructure funding can come from various sources:
- **Direct Provision by Developments:** New developments must address their direct impacts by providing or funding necessary infrastructure.
  - **Planning Obligations (Section 106 Agreements):** Legal agreements where developers contribute to infrastructure.
  - **Community Infrastructure Levy (CIL):** A charge on new developments collected for future infrastructure projects.
  - **Government Grants or Loans:** Funding from national or local government.
  - **Utilities Companies and Central Government:** Funding from statutory organizations and central government for specific projects like flood protection.
- 17.3. As the local plan progresses, detailed assessments of infrastructure needs and provision plans will be required.

## Monitoring

- 17.4. The Local Plan must be deliverable, not just aspirational. Each policy should outline intended outcomes and how success will be measured.
- 17.5. Monitoring is essential for assessing policy success. The council will produce an Annual Monitoring Report, which includes:
- **Housing Monitoring Update (HMU):** Tracks housing completions, projections, and land supply. This includes:
    - Total net and gross completions by district, parish, settlement, and Built-up Area.
    - Breakdown of completions on brownfield and greenfield sites.
    - Affordable housing statistics.
    - Housing projections and a
    -

- for the Local Plan period.
  - Five Year Housing Land Supply calculations.
  - Housing Delivery Test results.
  - Designated Neighbourhood Area Housing Requirement Figures.
- **Employment Land Review (ELR):** Assesses employment land availability and development. It identifies major employment sites and business parks, recording:
  - Developed plots and building floorspace.
  - Vacant or undeveloped plots suitable for future business development.
  - Analysis of Non-Domestic Rated (NDR) and vacant NDR units, including their uses and distribution.
- **Local Economic Review (LER):** Provides core economic statistics from Census data, Office of National Statistics datasets, and other evidence. It includes:
  - Wages and productivity.
  - Unemployment and economic inactivity.
  - Employee and job numbers.
  - Demographics and wellbeing.
- **Self and Custom-Build Report:** Details demand and supply for self-build plots, including numbers on the council's self-build register and plots granted planning permission.
- **Brownfield Land Register:** Lists suitable brownfield sites for development. To be included, sites must be:
  - Suitable for residential development according to Local Plan and NPPF policies.
  - Free from adverse impacts on the natural environment, habitats, or built heritage.
  - Viable and deliverable within 5 years.
  - At least 0.25 hectares in size or capable of supporting five or more dwellings.
  - Available for residential development without ownership or legal constraints.

17.6. Additional monitoring areas include section 106/CIL contributions, heritage strategy, gypsy and traveller sites, neighbourhood plans, and planning appeals.



## Chapter 18. Glossary of terms

The Government issues planning guidance in the form of the [National Planning Policy Framework \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

The NPPF includes a glossary of planning terms which is reproduced below. **It is proposed to delete this glossary and provide a link to the NPPF – though there maybe a limited number of terms that we may specifically want to define – either in a much shorter glossary or in plan text itself.**

### Affordable housing

Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

#### Affordable housing for rent

Meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

### Starter homes

Is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility

to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.

### **Discounted market sales housing**

Is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

### **Other affordable routes to home ownership**

Is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

### **Air quality management areas**

Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.

### **Ancient or veteran tree**

A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.

## **Ancient woodland**

An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites

## **Annual position statement**

A document setting out the 5 year housing land supply position on 1st April each year, prepared by the local planning authority in consultation with developers and others who have an impact on delivery.

## **Archaeological interest**

There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

## **Article 4 direction**

A direction made under Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 which withdraws permitted development rights granted by that Order.

## **Best and most versatile agricultural land**

Land in grades 1, 2 and 3a of the Agricultural Land Classification.

## **Brownfield land**

See Previously developed land.

## **Brownfield land registers**

Registers of previously developed land that local planning authorities consider to be appropriate for residential development, having regard to criteria in the Town and Country Planning (Brownfield Land Registers) Regulations 2017. Local planning authorities will be able to trigger a grant of

permission in principle for residential development on suitable sites in their registers where they follow the required procedures.

## **Build to Rent**

Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.

## **Climate change adaptation**

Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.

## **Climate change mitigation**

Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.

## **Coastal change management area**

An area identified in plans as likely to be affected by physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion.

## **Community forest**

An area identified through the England Community Forest Programme to revitalise countryside and green space in and around major conurbations.

## **Community Right to Build Order**

An Order made by the local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a site-specific development proposal or classes of development.

## **Competent person (to prepare site investigation information)**

A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation.

## **Conservation (for heritage policy)**

The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

## **Decentralised energy**

Local renewable and local low carbon energy sources.

## **Deliverable**

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a. sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b. where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be

considered deliverable where there is clear evidence that housing completions will begin on site within five years.

## **Design code**

A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area.

## **Design guide**

A document providing guidance on how development can be carried out in accordance with good design practice, often produced by a local authority. Designated heritage asset: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

## **Designated rural areas**

National Parks, Areas of Outstanding Natural Beauty and areas designated as 'rural' under Section 157 of the Housing Act 1985.

## **developable**

To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

## **Development plan**

Is defined in section 38 of the Planning and Compulsory Purchase Act 2004, and includes adopted local plans, neighbourhood plans that have been made and published spatial development strategies, together with any regional strategy policies that remain in force. Neighbourhood plans that have been approved at referendum are also part of the development plan, unless the

local planning authority decides that the neighbourhood plan should not be made.

## **Edge of centre**

For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

## **Entry-level exception site**

A site that provides entry-level homes suitable for first time buyers (or equivalent, for those looking to rent), in line with paragraph 72 of this Framework.

## **Environmental impact assessment**

A procedure to be followed for certain types of project to ensure that decisions are made in full knowledge of any likely significant effects on the environment.

## **Essential local workers**

Public sector employees who provide frontline services in areas including health, education and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers.

## **General aviation airfields**

Licensed or unlicensed aerodromes with hard or grass runways, often with extensive areas of open land related to aviation activity.

## **Geodiversity**

The range of rocks, minerals, fossils, soils and landforms.

## **Green infrastructure**

A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

## **Habitats site**

Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites.



## **Heritage asset**

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

## **Heritage coast**

Areas of undeveloped coastline which are managed to conserve their natural beauty and, where appropriate, to improve accessibility for visitors.

## **Historic environment**

All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

## **Historic environment record**

Information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use.

## **Housing Delivery Test**

Measures net homes delivered in a local authority area against the homes required, using national statistics and local authority data. The Secretary of State will publish the Housing Delivery Test results for each local authority in England every November.

## **International, national and locally designated sites of importance for biodiversity**

All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Special Scientific Interest) and locally designated sites including Local Wildlife Sites.

### **Irreplaceable habitat**

Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen.

### **Local Development Order**

An Order made by a local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a specific development proposal or classes of development.

### **Local Enterprise Partnership**

A body, designated by the Secretary of State for Housing, Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.

### **Local housing need**

The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 61 of this Framework).

## Local Nature Partnership

A body, designated by the Secretary of State for Environment, Food and Rural Affairs, established for the purpose of protecting and improving the natural environment in an area and the benefits derived from it.

## Local planning authority

The public authority whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority include the district council, London borough council, county council, Broads Authority, National Park Authority, the Mayor of London and a development corporation, to the extent appropriate to their responsibilities.

## **Local plan**

A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.

## **Main town centre uses**

Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

## **Major development**

For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m<sup>2</sup> or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

## **Major hazard sites, installations and pipelines**

Sites and infrastructure, including licensed explosive sites and nuclear installations, around which Health and Safety Executive (and Office for Nuclear Regulation) consultation distances to mitigate the consequences to public safety of major accidents may apply.

## **Minerals resources of local and national importance**

Minerals which are necessary to meet society's needs, including aggregates, brickclay (especially Etruria Marl and fireclay), silica sand (including high grade silica sands), coal derived fly ash in single use deposits, cement raw

materials, gypsum, salt, fluorspar, shallow and deep-mined coal, oil and gas (including conventional and unconventional hydrocarbons), tungsten, kaolin, ball clay, potash, polyhalite and local minerals of importance to heritage assets and local distinctiveness.

### **Mineral Consultation Area**

a geographical area based on a Mineral Safeguarding Area, where the district or borough council should consult the Mineral Planning Authority for any proposals for non-minerals development.

### **Mineral Safeguarding Area**

An area designated by minerals planning authorities which covers known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development.

### **National trails**

Long distance routes for walking, cycling and horse riding.

### **Natural Flood Management**

managing flood and coastal erosion risk by protecting, restoring and emulating the natural 'regulating' function of catchments, rivers, floodplains and coasts.

### **Nature Recovery Network**

An expanding, increasingly connected, network of wildlife rich habitats supporting species recovery, alongside wider benefits such as carbon capture, water quality improvements, natural flood risk management and recreation. It includes the existing network of protected sites and other wildlife rich habitats as well as and landscape or catchment scale recovery areas where there is coordinated action for species and habitats.

## **Neighbourhood Development Order**

An Order made by a local planning authority (under the Town and Country Planning Act 1990) through which parish councils and neighbourhood forums can grant planning permission for a specific development proposal or classes of development.

## **Neighbourhood plan**

A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law this is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act 2004.

## **Non-strategic policies**

Policies contained in a neighbourhood plan, or those policies in a local plan that are not strategic policies.

## **Older people**

People over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.

## **Open space**

All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

## **Original building**

A building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally.

## **Out of centre**

A location which is not in or on the edge of a centre but not necessarily outside the urban area.

## **Out of town**

A location out of centre that is outside the existing urban area.

## **Outstanding universal value**

Cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations. An individual Statement of Outstanding Universal Value is agreed and adopted by the UNESCO World Heritage Committee for each World Heritage Site.

## **People with disabilities**

People have a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs.

## **Permission in principle**

A form of planning consent which establishes that a site is suitable for a specified amount of housing-led development in principle. Following a grant of permission in principle, the site must receive a grant of technical details consent before development can proceed.

## **Planning condition**

A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

## **Planning obligation**

A legal agreement entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal. Playing field: The whole of a site which encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

## **Previously developed land**

Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

## **Primary shopping area**

Defined area where retail development is concentrated.

## **Priority habitats and species**

Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006.

## **Ramsar sites**

Wetlands of international importance, designated under the 1971 Ramsar Convention.



## **Low carbon and renewable energy**

Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

## **Rural exception sites**

Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.

## **Recycled aggregates**

aggregates resulting from the processing of inorganic materials previously used in construction, e.g. construction and demolition waste.

## **Safeguarding zone**

An area defined in Circular 01/03: Safeguarding aerodromes, technical sites and military explosives storage areas, to which specific safeguarding provisions apply.

## **Secondary aggregates**

aggregates from industrial wastes such as glass (cullet), incinerator bottom ash, coal derived fly ash, railway ballast, fine ceramic waste (pitcher), and scrap tyres; and industrial and minerals by-products, notably waste from china clay, coal and slate extraction and spent foundry sand. These can also include hydraulically bound materials.

## **Self-build and custom-build housing**

Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.

## **Setting of a heritage asset**

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

## **Significance (for heritage policy)**

The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.

## **Special Areas of Conservation**

Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites.

## **Special Protection Areas**

Areas classified under regulation 15 of the Conservation of Habitats and Species Regulations 2017 which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds.

## **Site investigation information**

Includes a risk assessment of land potentially affected by contamination, or ground stability and slope stability reports, as appropriate. All investigations of land potentially affected by contamination should be carried out in accordance with established procedures (such as BS10175 Investigation of Potentially Contaminated Sites – Code of Practice).

## **Site of Special Scientific Interest**

Sites designated by Natural England under the Wildlife and Countryside Act 1981.

## **Spatial development strategy**

A plan containing strategic policies prepared by a Mayor or a combined authority. It includes the London Plan (prepared under provisions in the Greater London Authority Act 1999) and plans prepared by combined authorities that have been given equivalent plan-making functions by an order made under the Local Democracy, Economic Development and Construction Act 2009 (as amended).

## **Stepping stones**

Pockets of habitat that, while not necessarily connected, facilitate the movement of species across otherwise inhospitable landscapes.

## **Strategic environmental assessment**

A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.

## Strategic policies

Policies and site allocations which address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004.

## Strategic policy-making authorities

Those authorities responsible for producing strategic policies (local planning authorities, and elected Mayors or combined authorities, where this power has been conferred). This definition applies whether the authority is in the process of producing strategic policies or not.

## Supplementary planning documents

Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

## Sustainable transport modes

Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra-low and zero emission vehicles, car sharing and public transport.

## Town centre

Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

## **Transport assessment**

A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies measures required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport, and measures that will be needed deal with the anticipated transport impacts of the development.

## **Transport statement**

A simplified version of a transport assessment where it is agreed the transport issues arising from development proposals are limited and a full transport assessment is not required.

## **Travel plan**

A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives and is regularly reviewed.

## **Wildlife corridor**

Areas of habitat connecting wildlife populations.

## **Windfall sites**

Sites not specifically identified in the development plan.

## Appendix 1 – Policies in the local plan that supersede or do not supersede Cranbrook Plan policies

Please note this is not the final format this table/appendix will take. Rather it is a working draft. Also the intent is to explicitly state in plan policy if policy applies or does not apply at Cranbrook, so it maybe desirable to delete this table.

Policy	Compatible with Cranbrook Plan?	Does it raise viability concerns?	Policy to cover Cranbrook Plan area?
SP01 Spatial strategy	Yes if Cranbrook mentioned in it.	No	Yes
SP02 Housing distribution	Yes, no conflict	No	Yes
<del>SP03 Levels of future housing development</del>	<del>Yes, no conflict</del>	<del>No</del>	<del>Yes</del>
SP04 Employment provision and distribution strategy	Yes, no conflict	No	Yes
SP05 Development inside settlement boundaries	Yes if Cranbrook and Broadclyst Station settlement boundaries are shown on the proposals map. The Cranbrook Plan In respdefines a BUAB for Cranbrook and Broadclyst Station,	No	? For consistency in terminology there is sense in superseding Cranbrook Plan policy CB8. Other than CB8 only the Cranbrook AH policy

Policy	Compatible with Cranbrook Plan?	Does it raise viability concerns?	Policy to cover Cranbrook Plan area?
	whereas the new LP defines settlement boundaries.		mentions the BUABs.
SP07 Development beyond settlement boundaries	Yes but if we keep policy CB8 then we have some mixed terminology between BUAB and settlement boundary so would need to consider if we need to address this. In respect of BUABs this policy applies at Cranbrook for outside boundaries	No	Yes
SP08 Delivery of infrastructure	Yes the Cranbrook Plan CB6 clearly sets out what infrastructure is required from the expansion areas and how we address unallocated sites within the plan area. This policy is more broadbrush but does add reference to long-term maintenance and management.	No	Yes
WS01 Development of a second new town east of Exeter	Yes but not relevant	N/A	No

<b>Policy</b>	<b>Compatible with Cranbrook Plan?</b>	<b>Does it raise viability concerns?</b>	<b>Policy to cover Cranbrook Plan area?</b>
WS02 Development within the Enterprise Zone	No Cranbrook town centre has been excluded in the current drafting	Possibly as references BREEAM excellent, which isn't a Cranbrook Plan requirement	No
WS03 Exeter Science Park	Not relevant	N/A	No
WS04 Land north of the Science Park	Not relevant	N/A	No
WS05 High quality employment north of Sowton village	Not relevant	N/A	No
WS06 Exeter Airport and its future operation and development	Not relevant	N/A	No
WS07 Employment land to the east of airport buildings	Not relevant	N/A	No
WS08 Employment land east of the airport and north of the A30	Not relevant	N/A	No
WS09 Green Infrastructure and the Clyst Valley Regional Park	Yes provided revised CVRP boundaries align with the expansion areas	No	Yes
WS10 Development next to the M5 and north of Topsham	Not relevant	N/A	No



<b>Policy</b>	<b>Compatible with Cranbrook Plan?</b>	<b>Does it raise viability concerns?</b>	<b>Policy to cover Cranbrook Plan area?</b>
WS11 Gypsy and traveller site east of the M5 and south of the Exeter-Waterloo line	Not relevant	N/A	No
Other settlement policies SD01 – SD25	Not relevant	N/A	No
Climate emergency (doesn't seem to have a policy ref.)	Possibly not – CB12 seeks zero-carbon development but not net-zero and also doesn't refer to calculating embodied carbon or retaining existing buildings	suspect that there is a financial cost of going from zero-carbon to net-zero carbon.	no
CC01 Net-zero caron development	On current wording - no, not compatible but if wording is to be changed to encouraging then probably yes.	Yes with current wording but no if changed to encouraging	Yes if wording changed.
CC02 Promoting renewables and zero carbon energy	Yes there is no conflict	No	Yes
CC03 Suitable areas for energy developments	Yes there is no conflict	No	Yes
CC04 energy storage	Yes there is no conflict	No	Yes
CC05 Heat networks	Yes, there is no conflict	No	Yes

<b>Policy</b>	<b>Compatible with Cranbrook Plan?</b>	<b>Does it raise viability concerns?</b>	<b>Policy to cover Cranbrook Plan area?</b>
CC06 Embodied carbon	Yes, there is no conflict so long as you don't end up specifying a percentage reduction	No provided you don't specify a percentage reduction	Yes if don't specify a percentage reduction
CC07 Flooding	Yes there is no conflict	No	Yes
CC08 Coastal change management area	Not relevant	No	No
CC09 Relocation of uses affected by coastal change	Not relevant	No	No
CC10 Development affecting coastal erosion	Not relevant	No	No
HN01 Housing to address needs	Yes there is no conflict. The Cranbrook Plan superseded H2 of the current Local Plan within Cranbrook only (not Broadclyst Station) but there is then no conflict between this policy and those in the Cranbrook Plan, especially as it references what is said in other DPD's	No	Yes
HN02 Affordable housing	No – the Cranbrook Plan only addresses affordable housing rates within the BUAB's and doesn't	No	Yes it needs to cover land outside the Cranbrook and Broadclyst Station BUAB's.

<b>Policy</b>	<b>Compatible with Cranbrook Plan?</b>	<b>Does it raise viability concerns?</b>	<b>Policy to cover Cranbrook Plan area?</b>
	pick up sites that are in the countryside.		
HN03 Housing to meet the needs of older people	Not entirely – point 3 re. proportion of accommodation for older people is not compatible	Yes if point 3 was relevant to Cranbrook, otherwise no	Yes but not point 3.
HN04 Accessible and adaptable housing	Yes in so far as the Cranbrook Plan is silent on this matter as we continued to rely upon Strategy 36	Yes possibly, it is more onerous than the requirements of Strategy 36	Yes it's the right thing to do.
HN05 Market housing mix	There is no direct conflict	Unclear – probably not.	Yes
HN06 Self-build and custom build housing	No – conflict with policy CB11 that requires 4% C&SB at Cranbrook However, policy only references Cranbrook and not sites outside of the town's BUAB	Not outside the Cranbrook BUAB	Yes, ideally sites outside Cranbrook BUAB
HN07 Residential sub-division of existing dwelling and buildings and replacement of existing dwellings	Yes, no conflict	No	Yes
HN08 Householder annexes, extensions, alterations and outbuildings	Yes, no conflict	No	Yes

<b>Policy</b>	<b>Compatible with Cranbrook Plan?</b>	<b>Does it raise viability concerns?</b>	<b>Policy to cover Cranbrook Plan area?</b>
HN09 Hostels and Houses in multiple occupation	Yes, no conflict	No	Yes
HN10 Provision for gypsy and travellers and travelling showpeople sites	Unclear, policy needs updating. Cranbrook Plan allocates land for 15 pitches but doesn't deal with windfall sites outside the allocations.	Unclear but unlikely	Yes suspect that it will need to cover it to address windfall sites
HN11 Rural exception sites and first homes exception sites	Yes, no conflict	No	Yes
HN11 Housing for rural workers	Yes, no conflict	No	Yes
SE01 Employment development within settlement boundaries	Yes, no conflict	No	Yes
SE02 Employment development in the countryside	Yes, no conflict	No	Yes
SE03 Farm diversification	Yes, no conflict	No	Yes
SE04 Resisting the loss of employment sites	Yes, no conflict	No	Yes
SE05 Employment and skills statements	Yes, no conflict	There will be an additional cost to setting out the statement	Yes, it's the right thing to do given the scale of the development.

<b>Policy</b>	<b>Compatible with Cranbrook Plan?</b>	<b>Does it raise viability concerns?</b>	<b>Policy to cover Cranbrook Plan area?</b>
SE06 Town centre hierarchy, sequential approach and impact assessment	Yes, no conflict provided that the sentence about applications for town centre uses not proposed in defined town centres references the Cranbrook Plan too.	No	Yes
SE07 Town Centre development	Yes, no conflict	No	No
SE08 Local shops and services	Conflict with policy CB23 that supports retail and other footfall dependent commercial activities and does not specify that they have to sell predominantly convenience goods nor require them to be at least 1km from a similar shop	No	We need it to cover the loss of local shops and services so yes, however don't want the section on the provision of new shops and services to be applicable with current wording.
SE09 Rural shops	Yes, no conflict	No	Yes
SE10 Sustainable tourism	Yes, no conflict	No	Yes
SE11 Holiday accommodation parks in designated landscapes	Not relevant	No	No
DS01 Design and local distinctiveness	Yes, no conflict	No	Yes
DS02 Housing density and efficient use of land	Yes, no conflict	No	Yes

<b>Policy</b>	<b>Compatible with Cranbrook Plan?</b>	<b>Does it raise viability concerns?</b>	<b>Policy to cover Cranbrook Plan area?</b>
DS03 Display of advertisements	Yes, no conflict	No	Yes
TR01 Prioritising walking, wheeling, cycling and public transport	Yes, no conflict	No	Yes
TR02 Protecting transport sites and routes	Yes, no conflict	No	Yes
TR03 Travel plans, transport statements, transport assessments	Yes, no conflict. CB18 references the need for travel plans but this doesn't conflict or undermine that.	No	Yes
TR04 Parking standards	Conflict with CB20 in respect of the detail of the 1.7 spaces per dwelling and the 1 cycle space per bedroom. No conflict in respect of employment parking standards.	No	Yes for non-residential uses only
TR05 Aerodrome safeguarded areas and public safety zones	Yes, no conflict	No	Yes
TR06 Digital connectivity	Yes, no conflict but CB17 already says pretty much the same thing	No	No, not really necessary
TR07 Wireless connectivity and telecoms infrastructure	Yes, no conflict	No	Yes

<b>Policy</b>	<b>Compatible with Cranbrook Plan?</b>	<b>Does it raise viability concerns?</b>	<b>Policy to cover Cranbrook Plan area?</b>
OL1 Landscape features	Yes, no conflict	No	Yes
OL2 National Landscapes	Yes, no conflict	No	Yes
OL3 Coastal preservation areas	Not relevant	No	No
OL4 Areas of strategic visual importance	Yes, no conflict	No	Yes
OL5 Green wedges	Need to sort out issue with the Rockbeare Green Wedge and the Treasbeare allocation, no conflict	No	Yes
OL6 Land of local amenity importance or local green space	Yes, no conflict	No	Yes
OL7 Contaminated land	Yes, no conflict	No	Yes
OL8 Potentially hazardous developments and notifiable installations	Yes, no conflict	No	Yes
OL9 Control of pollution	Yes, no conflict	No	Yes
OL10 Development on high quality agricultural land	Yes, no conflict	No	Yes
PB01 Protection of internationally and	Yes, no conflict	No	Yes

Policy	Compatible with Cranbrook Plan?	Does it raise viability concerns?	Policy to cover Cranbrook Plan area?
nationally important wildlife sites			
PB02 Protection of regionally and locally important wildlife sites	Yes, no conflict	No	Yes
PB03 Protection of irreplaceable habitats and important features	Yes, no conflict	No	Yes
PB04 Habitats Regulations Assessment	Yes, no conflict	No	Yes
PB05 Biodiversity Net Gain	No, conflict with CB26 which requires 10% BNG	Yes	No
PB06 Local nature recovery strategy and nature recovery network	Policy needs some refinement	No, I don't think so	Yes??
PB07 Ecological enhancement and biodiversity in the built environment	Yes, no conflict. Builds upon policy CB26	No	Yes
PB08 Tree, hedges and woodland on development sites	Yes, no conflict	It prescribes a specific number of replacement trees, which the Cranbrook Plan doesn't but there's nothing to explicitly demonstrate	Yes



Policy	Compatible with Cranbrook Plan?	Does it raise viability concerns?	Policy to cover Cranbrook Plan area?
		that there's an additional viability impact	
PB09 Protection and enhancement of the Jurassic Coast World Heritage site	Not relevant	No	No
PB10 Protection of designated geological sites	Yes, no conflict	No	Yes
PB11 Regionally important geological and geomorphological sites	Yes, no conflict	No	Yes
OS01 Access to open space and recreation facilities	Yes, no conflict	No	Yes
OS02 Land and buildings for sport, recreation and open space areas in association with development	The Cranbrook Plan prescribes fixed amounts for these typologies for the allocated land with strategy 43 being saved for the remainder of the Cranbrook Plan Area. So, conflict with the allocations but no conflict with the remaining land	There are increased costs associated with the adoption of Fields in Trust standards	Yes – but only the non-allocated parts
OS03 Location of facilities for sport and recreation,	Yes, no conflict	No	Yes

<b>Policy</b>	<b>Compatible with Cranbrook Plan?</b>	<b>Does it raise viability concerns?</b>	<b>Policy to cover Cranbrook Plan area?</b>
open spaces and allotments			
OS04 New allotments and avoiding the loss of existing ones	Yes, no conflict	No	Yes
OS05 Leisure and recreation developments in the countryside	Yes, no conflict	No	Yes
HE01 Historic environment	Yes, no conflict	No	Yes
HE02 Listed buildings	Yes, no conflict	No	Yes
HE03 Conservation areas	Yes, no conflict	No	Yes
HE04 Archaeology and scheduled monuments	Yes, no conflict	No	Yes
HE05 Historic landscapes, parks and gardens	Yes, no conflict	No	Yes
CF01 New or extended community facilities	Yes, no conflict	No	Yes
CF02 Loss of community facilities	Yes, no conflict	No	Yes

# Appendix 2 – Local Plan housing trajectory

