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To: Members of the Overview and Scrutiny Co-ordinating Committee  
(Councillors: Ray Bloxham; Peter Bowden; Iain Chubb; Trevor Cope;  
Christine Drew; Chris Gibbings; Roger Giles; Graham Godbeer;  
Steve Hall; Stephanie Jones; David Key; Jim Knight; Frances Newth;  
Barry Nicholson; Marion Olive; Helen Parr; Bob Peachey; Ken Potter;  
Graham Troman; Eileen Wragg; Steve Wragg)

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Portfolio Holders  
Other Members of the Council for Information  
Chief Executive  
Corporate Directors  
Planning Policy Manager  
Principle Planning Officer

**Special Meeting of the Overview and Scrutiny Co-ordinating Committee**  
**Tuesday, 2 February 2010 – 6.30pm**  
**Council Chamber, Knowle, Sidmouth**

Members of the public are welcome to attend this meeting.

- A period of 15 minutes has been provided at the beginning of the meeting to allow members of the public to raise questions.
- In addition, the public may speak on items listed on the agenda. After a report has been introduced, the Chairman of the Committee will ask if any member of the public would like to speak in respect of the matter and/or ask questions.
- All individual contributions will be limited to a period of 3 minutes – where there is an interest group of objectors or supporters, a spokesperson should be appointed to speak on behalf of the group.
- The public is advised that the Chairman has the right and discretion to control questions to avoid disruption, repetition and to make best use of the meeting time.

**AGENDA**

Page/s

1. **Public question time** – standard agenda item (15 minutes)  
Members of the public are invited to put questions to the Committee through the Chairman.

Councillors also have the opportunity to ask questions of the Leader and/or Portfolio Holders during this time slot whilst giving priority at this part of the agenda to members of the public

2. To receive any apologies for absence
3. To receive any declarations of interest relating to items on the agenda.

4. To consider any items which, in the opinion of the Chairman, should be dealt with as matters of urgency because of special circumstances.

(Note: such circumstances need to be clearly identified in the minutes; Councillors please notify the Chief Executive in advance of the meeting if you wish to raise a matter under this item. The Chief Executive will then consult with the Chairman).

5. To agree any items to be dealt with after the public (including the press) have been excluded. There are **no** items that the officers recommend should be dealt with in this way.
6. Decisions made by the Executive Board called in by Members for scrutiny in accordance with the Overview Procedure Rules under Part 4.5 of the Constitution. There are **no** items which have been identified.

## 7. Local Development Framework

**a) Progress and key questions:** Members to consider the report covering the responses received to the LDF Issues and Options Report and progress on the production of the Core Strategy for the Local Development Framework (LDF). Members are asked to consider the process of producing the LDF, and the resources needed to undertake the task, as well as consider the key questions set out in the report.

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There is an additional paper issued with this agenda entitled "Issues and Options Report: Analysis of Responses".

**b) Preliminary evaluation on Housing and Planning Delivery Grant:** Update on the position for information with notes for action for future years.

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### Members remember!

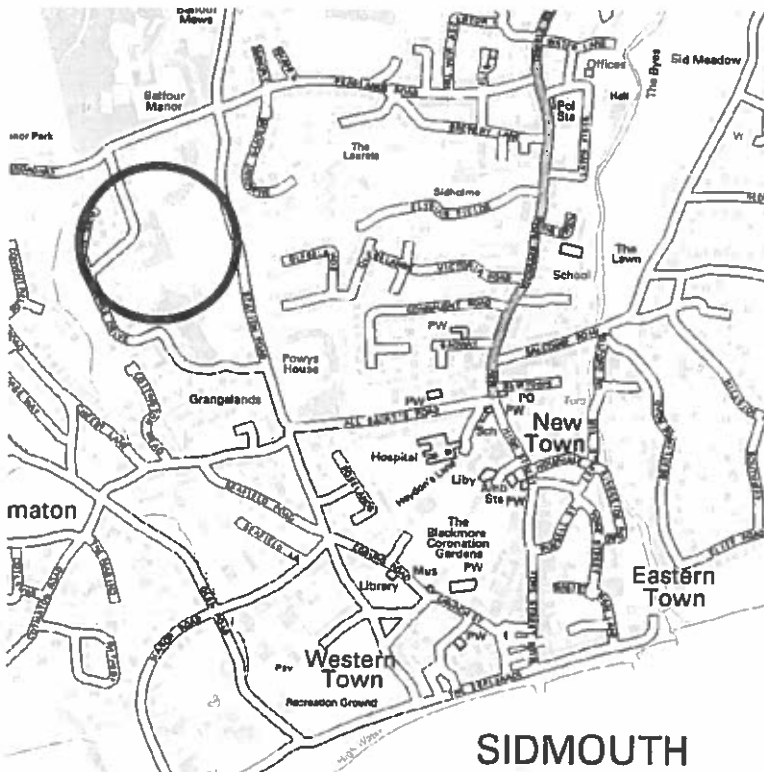
- You must declare the nature of any personal or prejudicial interests in an item whenever it becomes apparent that you have an interest in the business being considered.
- Where you have a personal interest because the business relates to or is likely to affect a body of which you are a member or manager as an EDDC nominee or appointee, then you need only disclose that interest when (and if ) you speak on the item. The same rule applies if you have a personal interest in relation to a body exercising functions of a public nature.
- Make sure you say the reason for your interest as this has to be included in the minutes.
- If your interest is prejudicial you must leave the room unless you have obtained a dispensation from the Council's Standards Committee or where Para 12(2) of the Code can be applied. Para 12(2) allows a Member with a prejudicial interest to stay for the purpose of making representations, answering questions or giving evidence relating to the business but only at meetings where the public are also allowed to make representations. If you do remain, you must not exercise decision-making functions or seek to improperly influence the decision; you must leave the meeting room once you have made your representation.
- You also need to declare when you are subject to the party whip before the matter is discussed.

## Suggestions for questioning during an Overview and Scrutiny meeting

Below are some prompts which may help you to form your own questions to ask at an Overview and Scrutiny meeting. Your questioning technique is crucial in creating an atmosphere conducive to open answers. Avoid excessive interrogation and treat those being questioned with courtesy and respect; however don't be afraid to ask supplementary questions if you feel that you haven't been given a clear answer.

- **IS IT REQUIRED?** (do we have this, does it make sense to tackle it, do we really need it).
- **IS IT SYSTEMS THINKING?** (is it evidence based and designed around the customer demands)
- **IS THE INTENTION CLEAR?** (what are we actually trying to achieve)
- **ANY REAL OUTCOMES?** (are we actually, and measurably, achieving things for our customers).
- **WHAT IS THE COST?** (both time and money)
- **DOES IT COMPLY?** (have we checked that it meets our obligations, the law, any formal guidance, and any Council policy or resolutions).
- **OTHERS DO WHAT?** (how do other organisations tackle this, best practice)
- **EFFECTIVE AND EFFICIENT?** (how do we know we're doing things well, in a timely fashion, and at "best value")
- **WHAT IS THE RISK?** (any areas of risk for the Council)
- **ANYONE LOSE OUT?** (are there sections of the community who might be disadvantaged by this approach, or be less able to take advantage, than others)
- **DOES IT LINK?** (have we linked this to other, similar, pieces of work within or outside the Council)

## Getting to the Meeting – for the benefit of visitors



The entrance to the Council Offices is located on Station Road, Sidmouth. **Parking** is limited during normal working hours but normally easily available for evening meetings.

The following bus service stops outside the Council Offices on Station Road:  
**From Exmouth, Budleigh, Otterton and Newton Poppleford – 157**

The following buses all terminate at the Triangle in Sidmouth. From the Triangle, walk up Station Road until you reach the Council Offices (approximately ½ mile).  
**From Exeter – 52A, 52B**  
**From Honiton – 52B**  
**From Seaton – 52A**  
**From Ottery St Mary – 379, 387**

Please check your local timetable for times.

The Committee Suite has a separate entrance to the main building, located at the end of the visitor and Councillor car park. The rooms are at ground level and easily accessible; there is also a toilet for disabled users.

Visitors please note that the doors to the civic suite (meeting rooms) will be opened ¼ hour before the start time of the meeting. Councillors are reminded to bring their key fobs if they wish to access the area prior to that time.

**For a copy of this agenda in large print, please contact the Democratic Services Team on 01395 517546**

## Agenda Item 7

Overview and Scrutiny Co-ordinating Committee

2 February 2010

JFM/MD



### East Devon Local Development Framework:

- 1. Planning for the Future - Issues and Options Report Responses.**
- 2. Progress report on Core Strategy production and LDF Panel Views on potential strategic allocations for development.**

### Summary

This report summarises the responses received to the LDF Issues and Options Report that was published for consultation between December 2008 and February 2009. It also updates members with regard to progress on the production of the Core Strategy for the LDF. Finally it summarises the views of the member LDF Panel on potential strategic site allocations which could be included in the Core Strategy and recommends these for further study.

### Recommendations

1. The responses to the LDF Issues and Options Report Consultation be noted and, together with the Sustainability Appraisal work, the analysis used to inform the production of the preferred options stage of the Core Strategy.
2. The progress made on production of the Core Strategy be noted and consideration given to the Key Issues highlighted in bold text in boxes in the body of this report.
3. Subject to the approval of the Development Management Committee, further consultations be carried out with statutory bodies and agencies in respect of those potential strategic site allocations that the LDF Panel felt merit further study (as set out in section 8 of this report) to enable the Council to make informed decisions about these at preferred options stage.
4. That members satisfy themselves that, in the light of the Planning Advisory Service diagnostic report, the arrangements for the line reporting of the Planning Policy team through the Head of Development Management to Karime Hassan, Corporate Director will enable sufficient resources to be made available from Development Management to complete the work on the Core Strategy to the timetable in section 10 of this report.

#### a) Reasons for Recommendation

To comply with legal requirements and to consider the responses of statutory bodies, other organisations and the wider public to the Issues and Options Report.

## **b) Alternative Options**

There is a legal requirement to undertake consultation as part of the production of the Core Strategy and therefore no alternatives are identified.

## **c) Risk Considerations**

Failure to produce a Core Strategy and to have consulted on its content will run counter to legislative requirements. This would jeopardise the likelihood of it being found 'sound' at examination and therefore its successful adoption. Including superfluous information within the Plan and/or not covering all of the appropriate and relevant issues and options could also put it at risk of being found unsound and also raises the possibility of the Council being vulnerable to a legal challenge.

## **d) Policy and Budgetary Considerations**

The Local Development Scheme provides policy and timetable (although this is in need of updating) considerations for production of the Core Strategy. The recommended further consultation on potential strategic site allocations is part of the statutory process to produce the Local Development Framework and can be achieved within the current LDF budget. However, in the long term ongoing scrutiny will need to be taken of available funds and costs in order to ensure that the Core strategy (and other LDF documents) can proceed to adoption.

## **e) Date for Review of Decision**

Not applicable

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## **1.0 Background**

### **Local Development Framework and the Core Strategy**

- 1.1 The plan making system changed in England in 2004 with the introduction of a legal requirement for Council's to produce Local Development Frameworks (or LDFs). The LDF is not a single document but is a term used to refer to a range of plans and policy documents and also other supporting documents.
- 1.2 As part of the LDF the Council is required to produce a programme management plan called a Local Development Scheme (or LDS). The Local Development Scheme sets out details of the policy documents that the Council wishes to produce and the timetable for their production. It is the responsibility of the Council to determine what plans it wishes to produce but the Local Development Scheme needs to be approved by Government.
- 1.3 Although Council's have flexibility in the documents they produce they do have to produce a Core Strategy. The role of the Core Strategy is to set out the overarching development objectives for the District and the broad policies to achieve them. In East Devon it is envisaged that the Core Strategy will address the following types of issues:
  - How many dwellings are to be built and where they are, broadly speaking, to be located.
  - Where new employment uses and of what type and what scale are to be located.
  - What physical and social and community infrastructure is required and in what locations.
  - How green infrastructure is to be provided and how we ensure the environment is protected and enhanced.

- 1.4 It is stressed that it is not the role of the Core strategy to address matters of detail and it is not the role of the Core strategy to allocate or identify specific sites for development purposes other than in respect of strategic sites. In recent changes to the LDF system the Government introduced the option for Councils to designate strategic development sites. Strategic sites will need to help deliver significant or major schemes, changes or outcomes required in an area. For example they may be needed in order to help deliver a major item of infrastructure.
- 1.5 The Core Strategy will form one of what are termed the Development Plan Documents (DPDs) for East Devon. DPDs are the policy making plans and over the years ahead the Council will be able to produce additional DPDs (over and above the Core Strategy). In the last East Devon Local Development Scheme it was advised that the Council will be producing the following DPDs:
- **Core Strategy** – as described above.
  - **Site Allocations Plan** – this plan will specifically allocate sites for development purposes, such as for housing and employment, and show detailed policy boundaries to meet localised and detailed needs.
  - **East of Exeter Action Plan** – this plan would address the major development proposals in the western part of the District (or East Devon's West End). It would provide detailed information on the various proposed projects and schemes and details of how they would be implemented.
  - **Axminster Area Action Plan** – this plan would provide detail on major development proposals for Axminster.
  - **Gypsy and Traveller Development Plan Document** – this plan would provide policy on and specifically allocate sites for gypsies and travellers.
- 1.6 The above were proposed plans for production. However, the last Local Development Scheme is now out of date and needs to be completely reviewed. Because Core Strategies can now allocate strategic sites (the last Local Development Scheme was produced when this was not allowed) it is envisaged that there will not be the need for Area Action Plans for East of Exeter and for Axminster. Also if the Council gives planning permission on a comparatively small number of gypsy sites (limited additional pitches) it will remove the need to specifically allocate sites and therefore to produce a Gypsy and Traveller Development Plan document.
- 1.7 The intention is that a revised Local Development Scheme will be produced in the coming months when more information is available about available staff resources and budgets. There will be the opportunity to reduce the planned number of Development Plan Documents with the potential to focus efforts on the Core Strategy and the Allocations plan.
- 1.8 Below DPDs come Supplementary Planning Documents (or SPDs). These are less time consuming and less complex to produce than DPDs and they advise on more detailed matters relating to the implementation of planning policy. The Council has already adopted an SPD for the Exeter Science Park and in the future could produce SPDs for allocated development sites and specific topic areas such as Biodiversity and Planning Obligations. The recent changes to the LDF system removed the requirement for SPDs to be included in the Local Development Scheme and for them to be subject to Sustainability Appraisal.

## Spatial Planning

- 1.9 One of the major changes that came in with the LDF system was a requirement to go beyond traditional land use planning and adopt a **spatial** approach. Under the former Local Plan making system the onus was on producing policies and allocating land for development without necessarily focussing attention on how or when development would occur and by



whom and what benefits it would deliver and how it would relate to or integrate with the proposals or policies of other bodies or organisations.

- 1.10 Under the LDF system it is a requirement that plans adopt a Spatial approach. This makes plan making more complex and time consuming but it does seek to ensure that plan production takes into account the proposals and expenditure plans and operational policies of other agencies and bodies. It also requires that Councils look closely at when and how and why proposals will be built and requires that Councils demonstrate that development schemes will be complementary to other public, voluntary and private sector bodies plans and proposals and operational policies and concerns. Spatial planning requires that common visions and outcomes are identified for localities and that proposals are geared around meeting these outcomes. Spatial Planning is, therefore, a fundamental part of the 'place shaping' agenda led by local authorities and be central to their corporate thinking and working.
- 1.11 Effective spatial planning and LDF document production requires gathering and use of rigorous evidence and the investigation and testing of alternative options and approaches. The onus is placed on 'front loading' which means understanding issues and how policy responses will work before decisions taken. At plan examination the Inspector will want to know why and how a policy or proposals will work or be implemented and why it is better or more appropriate than alternatives. Failure to have the evidence to demonstrate this will leave a Council vulnerable to having a plan (or parts of it) found not to be sound and therefore thrown out at examination.

#### **Links to the Local Strategic Partnership and Sustainable Community Plan**

- 1.12 A key role of LDF documents is to explain and set out how, where and when objectives and proposals in the Sustainable Community Plan will be implemented. The East Devon Sustainable Community Plan is produced and owned by a range of agencies and bodies and organisations in East Devon. LDF documents need to be consistent and compatible with the Sustainable Community Plan and explain how initiatives and prioritise in will be implemented through the planning system and how its thinking is to be translated into plan policy.

#### **Implementation Plan**

- 1.13 Alongside any LDF policy document there is also a requirement for the Council to produce an implementation plan. This will advise on how and why and when proposals will be built or implemented, and how they will relate to or pay for or secure needed and relevant infrastructure.

#### **Legal requirements**

- 1.14 The Core Strategy, as a Development Plan Document, has to be submitted to the Secretary of State and be subject to an Examination in Public carried out by an independent Inspector. The Inspector's recommendations are binding on the council. The Planning and Compulsory Purchase Act 2004 charges an Inspector with checking that the plan has complied with legislation. This includes in particular checking that the plan:
- **has been prepared in accordance with the Local Development Scheme and in compliance with the Statement of Community Involvement and the Regulations;**
  - **has been subject to sustainability appraisal;**
  - **has regard to national policy;**
  - **conforms generally to the Regional Spatial Strategy; and**
  - **has regard to any sustainable community strategy for its area (i.e. county and district)**
  - **In addition the Act requires the Inspector to determine whether the plan is**

**“sound”. To be “sound” a core strategy should be justified, effective and consistent with national policy.**

- 1.15 “Justified” means that the document must be: founded on a robust and credible evidence base and the most appropriate strategy when considered against the reasonable alternatives. “Effective” means that the document must be: deliverable, flexible, able to be monitored. Where the Council wishes to depart from the RSS or National Policy the stronger the evidence base will need to be to justify the position and this may require further studies with the consequent resource implications. .
- 1.16 If an Inspector finds that the Core Strategy is unsound then it cannot be adopted and has to be withdrawn rendering much expenditure on plan preparation and examination abortive. It will then be necessary to prepare a new Core Strategy addressing any issues that rendered the earlier version unsound.

### **Planning Advisory Service Diagnostic Report**

- 1.17 To assist with production of the East Devon LDF the Planning Advisory Service (a Government sponsored agency) provided a consultant to assess the Council’s plan making process and working practices. The consultant, Alison Blom-Cooper, reviewed Council literature and interviewed Members and Officers of the Council before issuing her report to the Council in 2009 (a copy is attached as Appendix 5). The report highlighted some areas of good practice but also identified weaker areas. As a result of the diagnostic the Planning Advisory Service are providing a series of training events for officers of the Council and also for Members and external partners.
- 1.18 Her report included the following executive summary:

*“The Council’s priorities have shifted in the last few years from one of landscape protection to promoting economic development and the provision of affordable housing. The Council has accepted the growth proposed in the RSS and this was acknowledged in the issues and options consultation in 2008. The Council’s target as set out in the corporate plan has been the delivery of 200 affordable homes per annum and to deliver at least one rural based housing scheme. Until recently they were anticipating that the new community at Cranbrook would deliver much of the affordable housing needs but this major development has been slowed by the downturn in the housing market and no housing has yet been built. This, coupled with a limited housing land supply, has led them to look at bringing forward other sites ahead of the LDF to meet the projected shortfall. Although the Local Plan was adopted as recently as 2006, this no longer reflects the corporate priorities. This has led to concerns by some that members and the LDF Panel have placed more focus on identifying possible development sites to meet the 5 year land supply rather than evaluating different options and alternatives for the core strategy. This may have resulted in a tendency to operate on a reactive basis to the immediate concerns rather than considering such issues in the wider corporate context of promoting/achieving the wider core strategy objectives.*

*The establishment of a cross party LDF members panel in 2008 is good practice. However, following the issues and options consultation, the recent focus of the LDF panel appears to have been on considering strategic allocations rather than articulating and achieving ownership of a wider common spatial vision about the “shaping of the place” and where they want to go to now. Although the vision for the West End of the district is clear, and appears to be shared, this is less clear for the rest of the district other than a general view that there should be some housing growth. There is a need to articulate and develop this wider vision and to share the key messages from evidence obtained with internal/external partners and to ensure that the core strategy is seen as a corporate document helping to achieve the council’s objectives rather than a land use planning tool.*



*Senior management and members understand the purpose of producing an LDF but it is not clear that this understanding is more widespread and extends outside of the growth area. Although the core strategy is seen as one of the key documents, this is not reflected in the resources allocated and the priority given to it by the authority. Urgent work is needed to consider the resources available for the LDF, particularly in the context of the council reviewing its budget for next year to achieve efficiency savings and the growth point funding which is only guaranteed until March 2010. Involvement of key stakeholders and partners, and the preparation of an infrastructure delivery plan owned by the LSP, is urgently required."*

## **Issues and Options Report Responses**

- 1.19 The Local Development Framework Issues and Options report was made available for public consultation between 1 December 2008 and 13 February 2009 with a questionnaire posing a series of questions. Responses were submitted by 478 individuals and organisations. In addition to these responses many respondents submitted supporting representations and documentation. The responses and supporting documentation (saved as pdf files) can be viewed in full on the Council's Planning Policy Consultation Portal on the Council website; <http://eastdevon-consult.limehouse.co.uk/portal>
- 1.20 The report enclosed with this agenda gives an analysis of the responses to each question in terms of the number of respondents who selected a particular option (where a choice was available) and this is also expressed in terms of percentages (for those questions where only one option could be selected). In some cases a summary of the response from key stakeholders is included.
- 1.21 Some of the key points from the responses are summarised below.

## **Vision**

- 1.22 **Question 2.1 - Do you consider that the vision is appropriate for East Devon? (please mark one box only)**

60% of respondents answered yes to this question but there were concerns about overemphasis on the West End to detriment of the remainder of the district.

### **Low or zero carbon development**

- 1.23 **Question 5.1 - Should the technical demands of achieving low or zero carbon development be given primary or significant weight in evaluating options for where and how additional development should take place in East Devon's West End? (please mark one box only)**

65% of respondents answered yes to this question. 23 of respondents answered no with commenting that, although desirable, the issue has to be considered in the light of development economics and viability and the key requirement to deliver affordable and cost effective housing, especially in a recession.

### **West End**

- 1.24 **Question 6.1 - Excluding development at Cranbrook and in East Devon's West End how many dwellings do you consider that we should seek to identify land for in East Devon for the period to 2026? (please mark one box only)**

52% of respondents answered that the aim should be to provide around 3,100 dwellings to meet the RSS requirements.

**1.25 Question 7.2 - Which option or options do you favour to meet RSS requirements for additional employment land in East Devon's West End? (Please mark as many boxes as you like)**

The expansion of the Airport Business Park (57% of respondents), the expansion of Skypark (55% of respondents) and expansion in the vicinity of the Science Park (50% of respondents) were the most favoured options

**1.26 Question 7.3 - If Cranbrook has to expand to accommodate an extra 4,600 dwellings please identify preferred options for expansion? (Please mark as many boxes as you like)**

The I&O Report set out 8 Options for the expansion of Cranbrook and respondents could select as many of the options as they liked. The percentages given below are therefore the percentage of the total number of people responding to the question who supported that option.

Option 1 – to the west . 65% of respondents supported this option

Option 2– to the south west. 47 % of respondents supported this option

Option 3 – to the south. 35% of respondents supported this option

Option 4 – to the north east. 46% of respondents supported this option

Option 5 – to the east, 38% of respondents supported this option

Option 6 – to the south east. 11% of respondents supported this option

Option 7 – to the east of the stream between Hand and Pen and Southbrook. 17% of respondents supported this option

Option 8 – to the east of the lane between Little Cobden and Crockernhayes . 8% of respondents supported this option

Of those who favoured a combination of options most support was for Options 1, 2 and 3 (9 respondents), Options 1, 2, 3 and 4 (9 respondents), Options 1, 2 and 4 (9 respondents), Rockbeare Parish Council carried out their own special consultation and respondents were deeply concerned about the threat of coalescence and the aggregate impact of all the developments proposed in East Devon's West End.

**1.27 Question 7.4 - Which option for a second new community do you favour to meet the RSS requirement for a 4,000 dwelling settlement by 2026 with the capability of expanding further in the long term? Please mark one box only**

52% of respondents favoured the Clyst St Mary/Westpoint option and made comments including - as the least disadvantageous and with plenty of space for further development (in contrast to Option 1). The improvements to transport networks, infrastructure and facilities would benefit existing settlements which feed off the A3052.

**1.28 Question 7.6 - Which option for an urban extension to Exeter do you favour if this is required to meet part of the RSS changes requirement for 4,000 dwellings in the East Area of Search 4B? (Please mark one box only)**

The three options in the Pinhoe area received a similar level of support (about 20% of respondents for each) and option 4 for an alternative site was the most favoured with support from 29% of respondents. Comments on option 4 suggested expanding existing settlements instead and land at Redhayes/Blackhorse was also suggested.

## **Rest of East Devon**

- 1.29 **Question 6.2 - Excluding Development at Cranbrook and in East Devon's West End how should we seek to distribute dwellings for the period to 2026?**  
49% of respondents favoured an urban focused approach , concentrating most development, 70% or more in the towns.
- 1.30 **Question 6.6 - Excluding development at Cranbrook and in East Devon's West End do you consider that employment land allocations/provision levels should exceed the 25 hectares figure? (Please mark one box only)**  
58% of respondents answered yes, to allow a wide range of employment sites to be allocated recognising that in the plan period not all sites would be developed.
- 1.31 **Question 6.7 - Should greater employment opportunities be provided at East Devon settlements to ensure a better provision of job opportunities close to where people live and on public transport routes? (please mark one box only)**  
90% of respondents answered yes.

## **A3052 Corridor**

- 1.32 **Question 8.1 - Should employment sites and other commercial/tourism business in the A3052 Corridor be expanded to meet employment needs and job creation opportunities?**  
47 % of respondents answered 'broadly yes' to this question with comments that the existing business parks and Crealy should be allowed to expand. Others drew attention to the fact this area is outside the AONB with good transport links. There was some concern about the capacity of the A3052. A number of respondents felt it should be made clear it is the western end of the A3052 that is being referred to.

## **Axminster**

- 1.33 **Question 9.2 - What scale of allocated/identified land to accommodate future residential development would you favour for Axminster? (please mark one box only)**  
66% of respondents favoured moderate levels of development (200-400 dwellings). 19 % favoured high levels (750 dwellings) and 7% very high levels (1000 dwellings). The high or very high level of growth, that would be need to provide a bypass, was therefore supported by only 26% of respondents.
- 1.34 **Question 9.3 - Which approach to alleviating traffic congestion in Axminster would you favour? (please mark one box only)**  
65 % of respondents favoured road improvements in the town and 29% supported a north south relief road. A number of those favouring road improvements in the town centre question the credibility and affordability of bypass development as well as the need for such a scheme and adverse environmental impacts/loss of countryside that may arise and adverse impacts on town centre traders. Those favouring a bypass highlighted such issues as economic benefits, reduced congestion, enhancement of the town centre, reducing vehicle pressure in the town centre and making the town centre safer.

**1.35 Question 9.5 - Which broad areas of growth or development would you favour for Axminster? (please mark all the boxes you consider appropriate)**

60% of respondents favoured a northerly expansion (Cloakham Lawns area) to Axminster with 14% favouring an easterly extension (the area for a north/south relief road).

Those favouring a northerly expansion highlighted potential for improved sports facilities, proximity to services, development not causing significant adverse environmental impacts and easy/quick potential for housing delivery.

Those favouring an easterly expansion majored on the potential to deliver a bypass but other issues mentioned included the reference to lack of danger of flooding and potential for expansion of the industrial estate.

**Budleigh Salterton**

**1.36 Question 10.1 - What scale of allocated/identified land to accommodate future residential development (and employment and other developments) would you favour for Budleigh Salterton? (please mark one box only)**

41% of respondents favoured a limited level of development (200 houses), 29 % supported a modest level of development (400 houses) and 29% felt neither option was appropriate.

**Exmouth**

**1.37 Question 11.1 - What scale of allocated/identified land to accommodate future residential development would you favour for Exmouth? (please mark one box only)**

39% of respondents favoured moderate levels of development (1000 dwellings), 20% favoured low levels of development (500 dwellings), 19% favoured very high levels of development (2000 dwellings) and 22% did not support any of these options.

**1.38 Question 11.2 - What scale of new employment and commercial provision would you favour in Exmouth? (please mark one box only)**

64% of respondents supported modest employment development (small scale greenfield sites and infilling) and 23% supporting significant employment development with major greenfield development.

**1.39 Question 11.3 - Which broad areas of growth or development would you favour for Exmouth? (please mark all the boxes that you consider appropriate)**

31% of respondents favoured directing development to within the town, 39% favoured a south-east expansion in the Littleham Valley, 13% favoured a northerly expansion in the Goodmore's Farm area,

**1.40 Question 11.4 - Dinan Way can only be reasonably expected to be completed through developer contributions, should we therefore plan for its completion knowing that it will also require enabling development?**

Those in favour of completing Dinan Way made comments including - take unsuitable traffic away from residential streets – effectively a northern relief road / heavy traffic /Sandy Bay traffic can use this route and will make the trading estates more attractive; One of the top priorities for Exmouth;

Those respondents who were opposed to completing Dinan Way made comments including – not until A376 problem is resolved. Road building at a time of 'peak oil' is illogical.

## Honiton

- 1.41 **Question 12.1 - What scale of allocated/identified land to accommodate future residential development would you favour for Honiton? (please mark one box only)**

39 % of respondents favoured very high levels of development (1000 dwellings or more) and 33% favoured moderate levels of growth (around 500 dwellings)

Those in favour of very high levels of development made comments including –Eastern bypass/A35 improvements badly needed. Western bypass supported. Honiton provides a sound opportunity for growth / has good infrastructure. Development in market towns required to support the rural economy and relieve pressure on A30 corridor east of Exeter.

Those respondents who favoured moderate levels of development made comments including – well served by rail and trunk road and well placed to accommodate future balanced development of housing and employment. Closure of M&S demonstrates the current size of the town cannot sustain some facilities. No growth until an eastern bypass in place and A373 closed to HGVs.

- 1.42 **Question 12.2 - What scale of new employment and commercial provision would you favour in Honiton? (please mark one box only)**

51% of respondents favoured modest levels (small scale greenfield and infilling) and 36% favoured significant employment development attracting major inward investment.

- 1.43 **Question 12.3 - Should we plan to accommodate bulky goods retail development in Honiton and if so where might it be located?**

48% of respondents answered 'broadly yes' to this question and 23% 'broadly no'.

Those in favour made comments including – on Heathpark only; must be complementary to the town centre; excellent transport network makes this a good location; appropriate provision will be consistent with planning policy and reduce trips to Exeter.

Those respondents who answered broadly no to this question made comments including – more suitable at the West End of East Devon or Exeter, threat to viability of the High Street.

- 1.44 **Question 12.4 - Which broad areas of growth or development would you favour for Honiton? (please mark all the boxes that you consider appropriate)**

33% of respondents favoured an easterly expansion and commented – avoids AONBs; would support provision of an eastern bypass; only realistic option for significant expansion subject to provision of infrastructure; well related to existing transport nodes with high accessibility to local facilities.

27% supported a westerly expansion and commented - most advantageous connections to road network; avoids AONBs; suitable for commercial development;

24% favoured directing development to within the town.

## **Ottery St Mary**

- 1.45 **Question 13.1 - What scale of allocated/identified land to accommodate future residential development would you favour for Ottery St Mary? (please mark one box only)**

54% of respondents supported low levels of development (around 250 dwellings) and commented – appropriate to meet local needs; should be matched by employment opportunities; insufficient infrastructure to support high levels of growth; because of poor road network and flooding problems.

26% of respondents favoured high levels of growth (500 dwellings or more) and commented – could act as an incentive to improve infrastructure – support expansion of facilities; would support local rural economy;

- 1.46 **Question 13.3 - Which broad areas of growth or development would you favour for Ottery St Mary? (please mark all the boxes you consider appropriate)**

34% of respondents favoured a westerly expansion to Ottery St Mary beyond the flood plain and commented – sensible option that limits traffic through the congested town centre; above the floodplain; direct link to the A30; reserve site for relocation of Kings School – already over capacity. 24% favoured directing growth to within the town.

- 1.47 **Question 13.4 - Do you support provision of a new supermarket in Ottery St Mary? (please mark one box only)**

49% of respondents answered 'yes' to this question and 39% 'no'

## **Seaton**

- 1.48 **Question 14.1 - What scale of allocated/identified land to accommodate future residential development would you favour for Seaton? (please mark one box only)**

43% of respondents favoured a limited level of residential development (150 houses) commented - overdevelopment would ruin the town; sufficient to provide the affordable housing required; facilities/infrastructure not adequate for major growth. 31% supported a higher level (300 dwellings) and made comments including - development has been restricted in recent years; the town needs more people to obtain an improved identity and support the local economy; affordable homes are required.

- 1.49 **Question 14.2 - Which broad areas of growth or development would you favour for Seaton? (please mark one box only)**

46% of respondents favoured directing growth to within the town and 34% favoured a northerly expansion to the town.

## **Sidmouth**

- 1.50 **Question 15.1 - What scale of allocated/identified land to accommodate future residential development would you favour for Sidmouth?**

51% of respondents favoured a lower level of development (250 dwellings), 32% did not favour either a high or lower level of growth and commented– exceptional built fabric and surrounding landscape mean only small sites for affordable housing should be permitted;



loss of greenfield land detrimental to the character of the town and its attraction as a tourist resort

- 1.51 **Question 15.3 - Which broad areas of growth or development would you favour for Sidmouth? (please mark all the boxes you consider appropriate)**

Directing growth into the developed areas of the town was the most favoured option with a north-westerly expansion the most favoured greenfield option.

- 1.52 **Question 16.1 - Which approach to defining appropriate locations for future village and rural development do you most favour? (please mark one box only)**

### **Rural Communities**

- 1.53 **Question 16.2 - Which approach to market and affordable housing provision in villages and rural areas do you most favour? (please mark one box only)**

68% of respondents favoured a 'wider issues' approach, assessing villages on a wide range of social, economic and environmental issues.

- 1.54 **Question 16.6 - Which approach to commercial and community facilities provision in villages and rural areas do you most favour? (please mark one box only)**

60 % of respondents were in favour of continuing the current policy with new community facilities allowed at villages with built-up area boundaries.

- 1.55 **Question 16.7 - Which approach to commercial development and rural enterprise do you favour? (please mark one box only)**

50% of respondents were in favour of a less restrictive approach to provision of employment with 34% in favour of development at or near to larger villages.

## **2.0 Consultation on a further Option for an Urban Extension to Exeter**

- 2.1 The Issues and Options Report set out three urban extension options to accommodate some of the 4000 dwellings the proposed changes to the Regional Spatial Strategy requires to be provided in East Devon within Area of Search 4B adjoining Exeter. These three options were all west of the M5 abutting Pinhoe. One of the questions asked was whether there were any alternative sites for such an urban extension. In response landowners/developers put forward areas of land to the east of the M5 in the vicinity of Blackhorse and the proposed Science Park. Since no third parties, including local residents have had the opportunity to comment on this option the Development Management Committee agreed to carry out a focussed consultation exercise in respect of this proposal. This will ensure that the Council can consider all the options on an equal basis in the light of public comments and the formal views of the County Council, Exeter City Council, the Highways Agency and other bodies and organisations.

- 2.2 The further consultation on the option for an urban extension to Exeter in the vicinity of Blackhorse and the proposed Science Park at Redhayes commenced on 2 November 2009 and closed on 14 December 2009. All the responses can be viewed in full on the Council's Planning Policy Consultation Portal on the Council website, (see paragraph 1.19 above)

- 2.3 The consultation was carried out for 6 weeks, starting November 2009. We received 65 responses, of which 39 objected to Option 4 (south of the railway), whilst 11 supported it. Q2, which asks whether respondents would support further development to the north of the railway line (Option 4a), was aimed at those 11 supporters of an urban extension in the first

question, therefore most replies were 'no comment'. However there were 21 specific replies, with 16 opposing and 5 in support of further development. All five supporters had also responded positively to question 1.

#### 2.4 Responses tended to fall into the following categories:

Observations relating to the strategic integration and phasing of an urban extension with existing development proposals in the East Area of search 4B  
Objections to one or both proposals on technical grounds  
Objections to one or both proposals on other grounds

#### 2.5 **Observations relating to the strategic integration and phasing of an urban extension with existing development proposals in the East Area of search 4B**

As might be expected, 'rival' developers all object to Options 4 and 4a and raise many of the technical constraints listed below to support their position- they also all state that their developments should be brought forward prior to other strategic sites. Highways Authority, Exeter City Council and DCC do not object to the development in principle but raise concerns, along with English Nature, about the phasing of any development and the ability to provide adequate infrastructure (particularly secondary school provision and highway capacity) if it is developed in parallel with other strategic sites. The assessment of development options in the LDF should therefore explicitly recognise the importance of strategic delivery and phasing in the East of Exeter area. Such a phasing framework will need to include both the coordinated phasing of development and its associated infrastructure.

- Areas 4 and 4a provide additional options for securing the overall scale of growth projected for the area to 2026, but must not endanger the delivery of a sustainable new community at Cranbrook or sites already identified for development within the city.
- A fragmented pattern of delivery would undermine the effectiveness of infrastructure delivery and funding (resulting either in excessive demand on capacity, underutilised capacity or lack of timely delivery).
- If both Options 4 and 4a were to be developed, they would create two separate housing areas, rather than an integrated new community/urban extension
- Options 4 and 4a should be assessed against all the other proposals for new development in East Area of search 4B
- A larger Cranbrook would be more sustainable than this proposal
- Option 4 could be served by high quality public transport and be linked to the city and other developments within East Devon, access to Option 4a is constrained and could add to existing network capacity problems.
- If newly created capacity is utilised by this development it will prevent subsequent developments going ahead
- Development of Options 4 and 4a would be close to the existing urban area and accessible to the proposed major strategic employment developments at the Science Park, Skypark and Exeter Airport

#### **Technical Constraints:**

#### 2.6 Transport links

HA are concerned that, even after improvement works, J29 and J30 may have insufficient capacity to accommodate additional traffic from all developments and M5 will be over-capacity. HA and DCC support Option 4 in principle as it is well-linked to the HQPT route.

Eagle 1 state that they have an option on land adjacent M5 and could overcome the HA concerns re the Tithebarn Lane bridge over the M5 improvements, which will otherwise not be carried out until 2016-2021.

- Development in option 4a would be less sustainable than in option 4 since it is less well linked to the proposed infrastructure improvements and would therefore generate more car travel and CO2 emissions.
- Junction 29 is at capacity/no further development until improvements are carried out
- Road improvements are dependent upon other development being implemented
- Option 4 could be served by high quality public transport and be linked to the city and other developments within East Devon
- Access to Option 4a is constrained and could add to existing network capacity problems
- Option 4a will function as a Cul-de-sac
- Road safety issues- additional traffic will be dangerous/nowhere for the air ambulance to land

#### Flooding

- 2.7 The Environment Agency have not identified any issues although local residents are concerned.

#### Grade 1 agricultural land

- 2.8 English Nature object strongly to the loss of Grade 1 land. Guidance requires a sequential approach demonstrating that other sites have been considered and discounted.

#### Water provision and drainage

- 2.9 South West Water have not identified any issues although local residents are concerned.

#### Aircraft noise

- 2.10 EDAL have aspirations to develop land around the airport for airport and other non-airport related employment uses. They emphasise that planning policies and development options around the airport must have regard to the strategic importance of the airport to the area, in line with adopted National, Regional and Local Planning Policy which seeks to promote the expansion of Exeter Airport and stop development which would prejudice the airport's operations. The Issues and Options Document identifies a 57 DB noise corridor related to the airport, as a constraint, in EDAL's view this does not take into account sufficiently the impact of aircraft noise on Area 4. PPG24 explains that a noise contour is not the only factor- proximity to the airport and in particular take off and landing and flight paths are also key issues and areas (such as 4 and 4a) which lie outside of the 57 DB contour could nonetheless be the subject of adverse impact from aircraft noise. In the absence of technical information which considers this issue it is possible that future residents of these areas would experience noise intrusion, which could lead to nuisance complaints and would potentially impact upon future airport expansion.

## Proximity to M5- Noise and Air quality

- 2.11 Area 4 does not directly abut the M5 and the distribution of land uses and landscaping, as well as layout and orientation at the detailed design stage, should ensure that noise disruption and air pollution to residents resulting from its proximity are minimal. In any case, there is existing residential development in closer proximity at Blackhorse and new housing has been constructed to the west of the M5 in Exeter without demonstrable harm. Area 4A immediately adjoins the M5 and any effects are therefore likely to be more intense, requiring the measures above plus attenuation measures such as bunding and landscaping in line with Environment Agency and Environmental Health guidance.

## Proximity to existing housing

- 2.12 New development may impact to an extent upon existing residents, however this will need to be managed at the detailed planning stage to ensure that any loss of amenity is minimised. There is scope for separation and buffer zones between existing and any new development and careful layout, design and landscaping should ameliorate the situation

## Education provision

- 2.13 DCC do not suggest any solution to the lack of secondary capacity issue, other than to state that it will be heavily dependent on the secondary school at Cranbrook coming forward prior to any other new development.

## 3.0 Regional Spatial Strategy

- 3.1 The Secretary of State's Proposed Changes to draft Regional Spatial Strategy were published in July 2008. Public consultation took place until 24 October 2008. About 35,000 responses were received. The Secretary of State intended to publish the final Regional Spatial Strategy at the end of June. However, in May, the High Court issued a judgement that the Sustainability Appraisal of the East of England RSS had failed to test reasonable alternatives to two of its proposals, and was thus in breach of the legal requirements. The Court remitted those proposals to the government to reconsider them. In June GOSW informed south west local authorities that publication of the South West RSS would be delayed to consider the implications of the High Court judgement.

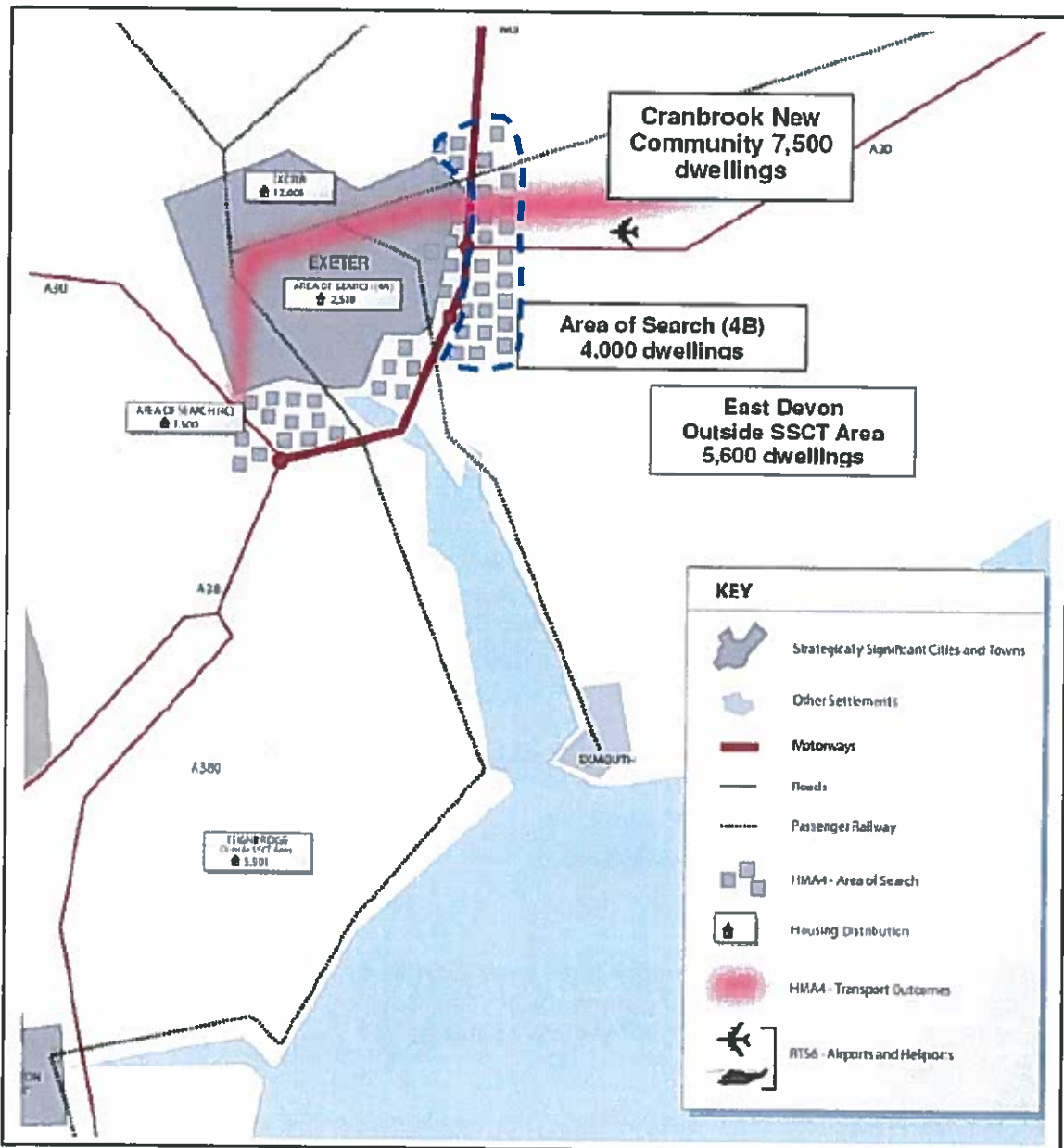
- 3.2 On 25 June the Deputy Regional Director of GOSW wrote to all south west Chief Executives to clarify the position. He said:

"In the meantime, the RSS has reached such an advanced stage that we would expect it now to be given considerable weight in consideration of any application for development. Our advice to local planning authorities remains that they should proceed with the preparation of Core Strategies (and any other development plan documents that may be relevant), and not wait for the final RSS to be issued."

- 3.3 Other commentators have cast doubt on the weight that can be attached to the RSS at present. On 25 September GOSW informed local authorities that the Government wishes to be satisfied that the Sustainability Appraisal of the Proposed Changes to the SW RSS tested reasonable alternatives to the Areas of Search in policies HMA1-13 for strategic housing, business and other development which were added or amended following consideration of the EiP Panel's report. Policy HMA4 relates to the Exeter Housing Market Area which includes East Devon and the Secretary of State did amend the proposals for Area of Search K in the Draft RSS. The further sustainability appraisal work will therefore need to test reasonable alternatives to the proposals for Area of Search 4B.

- 3.4 On 21 December GOSW informed local authorities that the new appraisal is expected to be completed in March 2010. Ministers will then decide how to progress the RSS, which may include additional consultation. GOSW reiterated their advice that Core Strategies should progress and there is no need to await the issuing of the final version of the RSS.
- 3.5 Unless otherwise stated references in the remainder of this report to the RSS are to the Secretary of State's Proposed Changes to the RSS published in July 2008. Map 1 below shows the distribution of dwellings proposed for East Devon in the RSS.

**Map 1 Exeter Inset Diagram - Proposed Changes to the South West Regional Spatial Strategy (For ease of reading the notations for the East Devon area have been enlarged and a dashed blue line placed around Area of Search 4B)**



4.0



## **Sustainability Appraisal / Strategic Environmental Assessment and Habitat Regulations Assessment**

- 4.1 The 2004 Planning Act requires that all Development Plan Documents are subject to Sustainability Appraisal (SA) and a European Directive requires a Strategic Environmental Assessment (SEA) to be carried out. Relevant assessment reports will need to be presented to the Inspector at Examination and the inspector will need to be advised of how the appraisal work has helped inform and refine any plan produced. Government guidance emphasises that SA should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process. SA should provide a powerful means of proving to decision makers, and the public, that the plan is the most appropriate given reasonable alternatives.
- 4.2 Although SA and SEA are separate requirements they are typically undertaken alongside one another and as part of a single on-going process.
- 4.3 As a separate exercise there is also a requirement for Appropriate Assessment (AA) to be undertaken of plans under the Habitat Regulations arising from European law. This assessment is concerned with the potential impacts of development on European Wildlife sites - Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). The relevant designated sites in East Devon are listed below but possible impacts of development in East Devon on sites beyond the District boundary will also need to be considered:
- The Exe Estuary
  - Beer Quarry and Caves
  - East Devon Pebblebed Heaths
  - River Axe from the Dorset border to the A3052
  - Sidmouth to West Bay Coast
- 4.4 Tenders were invited from six firms to carry out the SA/SEA and they were also asked to quote separately for the Habitat Regulations Assessment. Following interviews of three of the firms by the Chairman of the LDF Panel, the Strategic Planning and Regeneration Portfolio Holder and officers Land Use Consultants have been appointed to carry out the SA/SEA. Land Use Consultants have now also been appointed to undertake the initial Habitats Regulations work.
- 4.5 The key sustainability issues identified in the Scoping Report for the Sustainability appraisal produced in 2008 are:

### **A) Social Progress and Community Development**

#### **Housing**

- House prices in East Devon are very high in relation to wages, which are lower than the national average. This issue is compounded by a limited supply of affordable housing in the District (there is a shortfall of 736 affordable dwellings per year in East Devon for the five years from 2005<sup>1</sup>).
- The average household size in East Devon is smaller than the national average at 2.22 persons per dwelling and is continuing to fall.
- There are high levels of home ownership in the District (79.4%) and only 11.9% of the population lives in social rented dwellings.

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<sup>1</sup> Fordham Research Study for East Devon District Council (2001, updated 2005).



## Social Inclusiveness

- In the more remote rural areas and remote towns of East Devon, geographical isolation and dependence on low value added and seasonal work are key contributing factors to deprivation. However, in rural areas with easy commuting and access to centres of employment, deprivation levels tend to be far lower.
- Although the percentage of people in East Devon with no qualifications is lower than the national average, there are fewer people than average with higher level qualifications, indicating that the East Devon population has lower average qualification levels than the UK as a whole.
- Market and coastal towns are of particular importance in the East Devon District in terms of serving their resident communities and the wider surrounding areas.

## Population and Health

- The East Devon population is predicted to rise at a rate of around 1% per year through to 2029. This would indicate a District population of around 160,000 people by 2029, in comparison to 129,800 in 2005<sup>2</sup>.
- East Devon is characterised by an elderly population profile, particularly in the District's coastal towns. Around 29.5% of the population is retired compared to 17.3% in England overall.
- The District has an overall low population density; however there is significant variation between the rural and urban areas of East Devon.
- The vast majority of people in East Devon are white British (97.5% compared with 87% in Britain overall).

## Settlement 'Liveability'

- East Devon experiences low crime rates but despite this there is a high fear of crime, particularly threats such as drug and alcohol abuse, domestic violence and anti-social behaviour.
- Index of multiple deprivation data shows East Devon to have generally low levels of deprivation compared to the UK as a whole, although employment and income deprivation scores for the District are comparatively poor.
- Comparatively low overall deprivation levels for East Devon hide pockets of deprivation, for example in the south west of the District at Exmouth.

## B) Environmental Protection and Enhancement

### Built Heritage and Landscape

- Around 66% of the District is covered by two AONB designations – East Devon and Blackdown Hills.
- The Devon Redlands Joint Character Area has been described as 'neglected' and the Blackdown Hills as 'maintained'.
- There is significant archaeological heritage within East Devon, both land and shore-based. There are 188 Scheduled Ancient Monuments in East Devon and 4,408 listed buildings (this represents 1 for every 28.5 people, which is over four times the England average). Most are

<sup>2</sup> ONS Mid-Year Population Estimates 2005

privately owned residential buildings and most are in good condition, although a significant minority have defects and signs of deterioration.

- Recent housing developments have often been unsympathetic to local vernacular styles and materials, for example bungalows built in coastal towns. In Honiton and Exmouth, where particularly substantial residential growth has been experienced, a large number of newer properties can be seen which often pay little respect to traditional local styles.

#### Biodiversity

- East Devon is a district of significant biodiversity and nature conservation value - there are 25 SSSIs, four SACs and two SPAs, as well as a number of non-designated sites which hold high ecological value, including broadleaved woodland, rivers and streams and maritime cliffs and slopes.
- The District is a nationally important area for winter roosting bird species in areas such as the Axe and Exe Estuaries.

#### Air, Soil and Water Quality

- A number of potential significant sources of air pollution exist in and around East Devon, including Exeter International Airport, industrial sites in bordering authorities, petrol stations and road traffic on the M5 motorway, and local road network.
- East Devon has limited pockets of contaminated land as the District has not had a history of intensive urban growth or industrialisation. The percentage of housing built on previously developed land in East Devon has increased generally over recent years, but there was a fall in 2006/7 from the previous year.

#### Transport

- Car use for travelling to and from work is marginally higher in East Devon than across England as a whole and public transport use is significantly lower.
- Although many residents have good access to transport links, particularly at the western part of the District which lies at a strategic transport node, there are rural parts of East Devon which are accessed by remote lanes and have poor public transport services.
- Improvements to Junction 29 of the M5 will be required as a result of new developments planned in the western part of East Devon, such as a new community at Cranbrook, a new terminal for Exeter Airport and a major business park (Skypark), in order to accommodate the increasing volume of traffic.

#### Climate Change

- The biggest contributors to CO<sup>2</sup> emissions in East Devon are the road transport and domestic sectors at 36.8% and 35.8% respectively. In the South West overall, the top two contributors are the industry and commercial sector and domestic sectors, at 36.1% and 32.8% respectively.
- Per capita CO<sup>2</sup> production is high in the East Devon District (8.4 tonnes) compared with Exeter (5.7 tonnes) but similar to the regional average of 8.2 tonnes. This is characteristic of a predominantly rural area with a higher reliance on road transport.
- Incidences of flooding in East Devon are expected to rise with projected sea level rises and wetter winters. Areas of Flood Zones 2 and 3 are identified around all of the main rivers in the District as well as many of their tributaries.

## C) Natural Resource Management and Conservation

### Energy Consumption

- Devon currently receives around 1.8% of its energy supply from renewables, mainly from methane gas from landfill and small hydro schemes.
- East Devon has achieved greater improvements in domestic energy efficiency than the South West region overall – 19.8% compared to 15.3%.
- High renewables targets have been set by the South West RSS. There is significant scope within East Devon for small-scale community based energy production and combined heat and power (CHP) schemes.

### Waste

- Household waste levels in East Devon are increasing year on year.
- Landfill capacity in the District is becoming depleted.
- There is an ongoing drive to increase levels of recycling and composting.

## D) Economic Growth and Employment

### Economic Growth

- There is a high demand for development land to serve the sub-regional role of Exeter, affecting planning policy and land allocations in East Devon.
- East Devon has low unemployment levels – fewer than 2% of the economically active population.
- A high proportion of jobs in the District are in the tourism sector, which is often seasonal work with limited opportunities for training and progression (16% of jobs in Devon are related to tourism).
- Many of the better paid residents of East Devon commute to jobs beyond the District boundary, particularly to Exeter.

## 5.0 East of Exeter Transport Schemes and provisional outcomes from Phase 3 Access Study

- 5.1 At the first meeting of the LDF Panel Dave Black, Head of Transportation at Devon County Council gave a presentation on the planned East of Exeter Transport schemes and the provisional outcomes from a study as to how to accommodate the higher housing figures proposed in the Secretary of State's Changes to the RSS, in particular the 4000 dwellings proposed in East Devon in Area of Search 4B. Both the possible options for a second new community (which would need to be able to accommodate in the long term at least 6000 dwellings) required major highway infrastructure which cast doubts on their deliverability. A second new community in the vicinity of Westpoint would require a new link across the M5 crossing the Clyst floodplain as well as a link to the airport junction on the A30. A second new community adjoining Pinhoe would require a new link crossing the M5 and the railway.
- 5.2 There was capacity on the A30/Cranbrook corridor for 10,000 dwellings (once both the proposed Junction 29 improvements and the proposed Phase 3 Access Strategy works were completed) but with Cranbrook proposed to grow (under RSS policy) to 7,500 dwellings a maximum of an additional 2,500 dwellings could be provided on this corridor and the only other location for growth would be in the vicinity of Redhayes and Blackhorse with capacity

for some 2000 dwellings. Provisionally it was anticipated approximately 1000 dwellings could be accommodated at Pinhoe before the existing highway network was at capacity. There was an option of distributing all the 4000 dwellings (or the balance of 1000 dwellings if development at Redhayes/Blackhorse and Pinhoe were to proceed) to the market towns in East Devon, but this would not be in conformity with the RSS.

- 5.3 The County Council commissioned Parsons Brinckerhoff to prepare a technical report to identify and evaluate the transportation implications of the strategic options for accommodating the shortfall in dwelling provision to meet the requirements in the Secretary of State's proposed changes to the Regional Spatial Strategy. It is understood that the report will be considered shortly by the Exeter and East Devon Growth Point Board.

## **6.0 Other Studies to form Part of the Evidence Base for the Core Strategy**

- 6.1 The SA, SEA and AA and the Phase 3 Access Strategy referred to above form part of the evidence base for the LDF and the Core Strategy. The main completed studies and studies in progress are:

### **Completed Studies**

Housing Needs Survey June 2001 (Volumes I & II)

Housing Needs Survey Update March 2005

Sustainability Appraisal – Generic Scoping Report 2007

East Devon Employment Land Review 2006 – 2026, Nov 2007 (and follow on East Devon Task and Finish Forum)

Employment Land Availability Assessment 2008

Exeter and Torbay Housing Market Assessment - East Devon Report 2008

Retail Needs Study and Town Centre Health Check 2008

Exeter Hotel Study - Final Report 2007

Exeter and East Devon Growth Point Low and Zero Carbon Study 2008

Strategic Flood Risk Assessment, 2008

Landscape Character Assessment and Management Guidelines 2008

Green Infrastructure Study – Exeter and East Devon New Growth Point 2009

Green Infrastructure Strategy – LDA Design 2009

### **Studies in Progress**

Strategic Housing Land Availability Assessment - EDDC

Exeter and East Devon Infrastructure Study – AECOM

LDF Sustainability Appraisal – Land Use Consultants

LDF Habitat Regulations Assessment (Appropriate Assessment) – Land Use Consultants

East of Exeter Transport Phase 3 Access Study – Parsons Brinckerhoff for Devon County Council

- 6.2 A number of these studies have been commissioned by the New Growth Point Team, in some instances to cover just the Growth Point (or part of it) and in others to also cover the whole of East Devon. Other studies have been commissioned by the Council directly.

## Strategic Housing Land Availability Assessment

- 6.3 A key task undertaken by the Planning Policy section over the last 24 months has been the production of the first East Devon Strategic Housing Land Availability Assessment (or SHLAA). The SHLAA, which is required by Government planning guidance, is scheduled for completion in March 2010 and it has been a very substantial piece of work (estimated at taking over 300 days of officer time). It has involved critical assessment of over 450 sites submitted by the public/agent/prospective developers as offering potential for housing development. The SHLAA process is concerned with examining whether sites, on technical and financial grounds, could or would be developed and at what time scale developed would be expected to occur (assuming planning permission were granted). It is important to stress that the SHLAA process does not allocate sites for development purposes or recommend which, if any sites, should be allocated. What it does do is provide the Council with a database of potential development sites.
- 6.4 The SHLAA has been produced under a common methodology agreed by the authorities of the Exeter Housing Market Area (East Devon District, Exeter City, Mid Devon District, Teignbridge District, Dartmoor National Park Authority and Devon County Council). It has involved consideration of sites by an independent Panel drawn from the development industry and agents, highways authorities, Environment Agency, Natural England and other organisations. The Panel will have met on four occasions before the SHLAA report is finalised. After March the SHLAA process will start again and will be rerun on an annual basis.
- 6.5 The SHLAA will be a fundamental piece of housing evidence to inform the Core Strategy and other LDF documents. It will inform policy choice on appropriate sites for development and will also underpin future assessments of 5 year housing land supply.
- 7.0 Local Development Framework Panel: Emerging Development Strategy and Potential Strategic Allocations for Development**
- 7.1 The Local Development Framework Panel met on 19 occasions in 2009 with other members in regular attendance.
- 7.2 The Panel has been conscious that the Core Strategy is not just a housing allocation exercise but an opportunity to achieve the Council's vision for East Devon to create vibrant, mixed income and mixed age sustainable communities. A spatial representation of the vision for East Devon has been considered by the Panel and this is attached as Appendix 6.

### Key Issue 1.

**Does the East Devon Spatial Vision encapsulate the Council's aspirations for East Devon?**

- 7.3 The East Devon Core Strategy needs to be in conformity with the Regional Spatial Strategy which focuses growth in East Devon's West End adjoining Exeter. Over the period to 2026 the RSS requires the provision of 11,500 dwellings in East Devon's West End (7,500 at Cranbrook and 4000 at area of Search 4B to the east of Exeter) plus 100 hectares of employment land. In the rest of East Devon the RSS requires provision of a minimum of 5,600 dwellings. Whilst not objecting to the overall figure of 17,100 dwellings for East Devon in the RSS the Council did not support the growth of Cranbrook beyond 6,500 dwellings preferring instead to increase the figure for the rest of East Devon to 6,600 dwellings. This

would enable the Council to provide housing for our local communities and recognise the problems of housing delivery in the West End.

- 7.4 However, this approach runs the risk of the Core Strategy not being in conformity with the RSS. The 7,500 dwellings at Cranbrook and the 4,000 dwellings in Area of Search 4b are part of the provision for growth at the Exeter SSCT (Strategically Significant Cities and Towns). Development Policy A requires the primary focus for development in the South West to be the SSCTs, Development Policy B relates to development at Market and Coastal Towns and Development Policy C relates to development at Small Towns and Villages. Text added to the RSS in the Secretary of State's Proposed Changes specifically addresses this issue of transferring development required at the SSCT to other areas:

“Development Policies A, B and C set specific outcomes for different types of places. They do not set out a sequential or 'cascade' approach to the location of development; so development needs relating to an SSCT should not be met at a settlement identified under Development Policies B and C, and development needs relating to a market or coastal town should not be met at a settlement identified under Development Policy C.”

- 7.5 To be able to demonstrate that higher housing numbers can be achieved in the rest of East Devon the LDF Panel's approach has been to identify potential strategic allocations and examine whether these are deliverable or if there are any major barriers to development.

#### **Key Issue 2.**

**A Core Strategy that proposes 1000 dwellings fewer at Cranbrook and 1000 dwellings more in the rest of East Devon than the RSS requirement runs the risk of being found 'unsound' at Examination. A robust evidence base will be required to justify not producing a Core Strategy in conformity with the RSS.**

#### **Key Issue 3.**

**An alternative approach would be to accept the RSS figures for Cranbrook and Area of Search 4b but still plan to exceed the 5,600 dwelling figure for the rest of East Devon. An Inspector is likely to be more relaxed about overprovision than under provision of dwellings and would have the option to make changes to reduce the provision in the rest of East Devon if he or she felt this was necessary to make the Core Strategy 'sound'. The RSS requirement is for 'at least' 5,600 dwellings and some level of overprovision is therefore likely to be acceptable.**

- 7.6 The amended version of Planning Policy Statement 12: Local Spatial Planning issued in 2008 makes provision for the allocation of strategic sites for development in Core Strategies. These should be sites considered central to the achievement of the strategy. The Issues and Options Report set out options for directions of growth for Cranbrook, elsewhere in East Devon's West End and in each of the towns. Potential strategic allocations are the expansion of Cranbrook (the RSS changes propose 7,500 dwellings), the site(s) for the 4000 dwellings in Area of Search 4B adjoining Exeter, and sites at Axminster, Exmouth and Honiton.

- 7.7 Emerging LDF Panel considerations point toward larger scale strategic growth for the towns of Axminster, Exmouth and Honiton. These are identified as key local service centres that offer scope for further expansion and development. Axminster and Honiton are centres where community aspirations for further growth have been expressed and Exmouth, as the



largest town in Devon, could be expected to accommodate significant growth. These towns are:

- well served by existing facilities (including railway stations);
  - locations where larger scale development proposals have been promoted by landowners/developers/agents.
- 7.8 The other larger towns or East Devon (Ottery St Mary, Seaton and Sidmouth) are more constrained in terms of development potential and/or are less significant service centres. Emerging LDF Panel thoughts on these towns point towards lower levels of growth to be planned for. In other towns, villages and rural areas of East Devon development and growth will be primarily geared towards meeting locally generated needs whilst sustaining and promoting vibrant local communities and facilities, supporting strong and growing economies and protecting and enhancing environmental assets.
- 7.9 The Issues and Options Report asked a question about the future scale of growth at each of these towns with options of a low level to very high. The high level option for Exmouth was stated to be 2000 dwellings or more (reflecting its position as the largest town in the District) and for Axminster and Honiton the high level option was for 1000 dwellings or more. The high level option for Ottery St Mary and Sidmouth was for 500 dwellings or more, and for Seaton it was for 300 dwellings.
- 7.10 At a series of meetings the Panel carried out site inspections and received presentations from agents for developers/landowners who put forward land as potential strategic allocations for development in the Core Strategy at the West End, Axminster, Exmouth and Honiton. The sites considered; a summary of the representations made in respect of each one and the Panel's view on each site's merits is discussed below. Council agreement is sought that the sites felt worthy of further investigation by the Panel merit more detailed investigation as possible strategic allocations. Further consultations will then be carried out with Devon County Council, the Highways Agency and other statutory bodies. This will provide more detailed evidence about whether the sites are deliverable and will inform the sustainability appraisal work. In addition to receiving presentations the Planning Policy team also employed three agency staff to assess potential strategic growth options at these towns. Their town specific reports for Axminster, Exmouth and Honiton will be presented to Council in 2010.

## **8.0 Local Development Framework Panel: Core Strategy Potential Strategic Allocations for Development**

- 8.1 The Panel have made it clear to developers/landowners and their agents that any steer they gave about potential development areas was without prejudice to the subsequent determination of any possible planning application by the Development Management Committee and further that, in the event that a planning application comes to committee then members reserve their position until they are in full possession of all the relevant facts and arguments for and against. The sites and the Panel's views on each are set out below.

### **Cranbrook Expansion Options**

- 8.2 The Proposed Changes to the Regional Spatial Strategy specify that Cranbrook should grow to accommodate 7,500 dwellings. The Issues and Options Report set out 8 potential areas for the expansion (see plan at Appendix 1). The Panel received two presentations in respect of the expansion of Cranbrook:
- i) Savills of behalf of the owners of Rockbeare Court Farm gave a presentation in respect of the bulk of Area 3 and the western part of Area 6

ii) Members were concerned that development south of the A30 would erode the green wedge between Cranbrook and Rockbeare and potentially affect the airport. However, the Panel had been pleased with the approach presented by Savills in respect of land south of the A30, particularly the sensitivity to the area and the emphasis placed on understanding the importance of planning in sympathy with the landscape. They believed a buffer could be created in the manner proposed by Savills that would retain Rockbeare's identity and deliver an extension to Cranbrook. The Panel wished to see work progress on the technical documentation to support the proposals.

iii) David Lock Associates on behalf of the New Community Partners gave a presentation in respect of Area 1, 2, small part of Area 3 (western end), Area 5 and part of Area 7 (west of the Knoll).

iv) Overall members felt that a landscape led approach was required in considering the options for the expansion of Cranbrook and that this might result in lower housing numbers than initially thought. Nevertheless, proposals for a west extension (Area 1 in the Issues and Options report) and east extension (Area 5 and part of 7), maintaining the green wedge to Whimble were positively received. The mix of employment and some residential proposed by the prospective developers was supported but it was considered that the balance of the mix was not correct. Members wished to see more employment to provide a meaningful buffer between the airport and for a landscape appraisal to rigorously test the southern boundary. Further information was also required about the acceptability of residential development in this area in view of aircraft engine testing at the airport, particularly at night.

#### **Key Issue 4.**

**The Council's stated position is to limit Cranbrook to 6,500 dwellings. Nevertheless the sustainability appraisal process requires the Council to consider reasonable alternatives and one of these is expanding Cranbrook to the 7,500 dwellings required by the RSS.**

**Expansion of Cranbrook to more than 7,500 dwellings will need to be considered (and/or dispersal to the rest of East Devon) if the option of a second new community is ruled out and the capacity of the B3181 limits development adjoining Pinhoe which would make it unlikely that 4000 dwellings can be delivered adjoining Exeter.**

### **Urban Extensions to Exeter**

8.3 The Proposed Changes to the Regional Spatial Strategy specify that 4000 dwellings should be provided in what was called Area of Search 4B largely to the east of the M5 but including land west of the M5 adjacent to Pinhoe. Although the Proposed Changes to the RSS do not refer to a second new community the schedule of changes and reasons describes the proposed 4000 dwellings in Area of Search 4B as *'increase the level of housing development at the second new community in East Devon to 4,000 within the RSS period.'* and the reason given is *'Area of Search 4B – to bring forward a greater proportion of the proposed second new community within the RSS period.'* Accordingly the Issues and Options Report raised the possibility of a second new community and put forward two possible sites. One of these was adjoining Pinhoe and the other was in the vicinity of Westpoint. No representations were received from landowners/developers promoting a second new community at the Pinhoe location but, as an alternative to Option 2, land in the triangle of Greendale/Hill Barton/Crealy World of Adventure was put forward by Bell Cornwell on behalf of landowners. However, none of the evidence required to support such a proposal has been submitted and the agents did not take up the invitation to make a presentation to the LDF Panel on the scheme. The absence of any serious developer/landowner interest and the difficulties of funding the major additional infrastructure that would be required (that would be additional to all the current

proposals on the A30 corridor) makes the deliverability of a second new community highly questionable.

8.4 The options set out in the Issues and Options Report for an urban extension to Exeter were all to the north east of Pinhoe utilising the spare traffic capacity on the B3181 through Pinhoe. The options were for 1. Land at Park Farm on the north west side of the B3181 between the city boundary and Westclyst, 2. Land at Pinn Court Farm, between the B3181 and the M5 and, 3 Land straddling the B3181 involving parts of options 1 and 2. The Panel received presentations in respect of proposed urban extensions at both Park Farm and Pinn Court Farm.

i) Bell Cornwell on behalf of the landowners gave a presentation in respect of land at Park Farm.

ii) The Panel responded positively to the presentation and in principle considered the site could deliver an urban extension to Exeter to contribute to meeting the RSS requirements. The agents considered the site could accommodate up to 1,300 dwellings. The Panel were aware that the access issues are a major constraint on the total amount of development that could be accommodated in the area and members were supportive of an early phase of development that would allow 300-500 dwellings to come forward. This would include a negotiated percentage of affordable dwellings and the Panel gave significant weight to the early supply of affordable housing.

iii) Millwood Homes and Tetlow King Planning gave a presentation in respect of land at Pinn Court Farm.

iv) The Panel felt that whilst there were merits in the proposals there is a fundamental concern about noise from the M5 Motorway and thus the acceptability of this location for housing. The noise issue in part relates to technical concerns but is also a perceptual issue around what makes for an attractive and appealing living environment and how noise levels on one site should be compared with those on another and the weight that should be attached to these noise considerations when comparing alternatives. Members acknowledged that there are measures that might potentially be put in-place that could limit noise levels. However, such measures might be at a high initial installation cost and they could have longer term maintenance costs associated with them and potential uncertainty around who might pay for and be responsible for such maintenance. Millwood Homes and Tetlow King Planning were advised that further detailed noise assessment work needs to be undertaken at this site alongside assessment of potential mitigation measures and consideration of longer term maintenance responsibilities and associated cost issues.

v) The Executive Board at its meeting on 15 July 2009 approved a recommendation from the Overview and Scrutiny Co-ordinating Committee meeting of 1 July 2009 that "the development Management committee take urgent action to have sites reviewed for potential urban expansion of Pinhoe following the report of the Local development Framework Panel in September."

#### **Key Issue 5.**

**Members support the principle of an urban extension at Pinhoe (Park Farm / Pinn Court Farm) but recognise that the capacity of the B3181 through Pinhoe to accommodate additional traffic is the major constraint to the level of housing development that can be accommodated. Clear guidance is required from Devon County Council, as Highway Authority on this issue.**

## Redhayes/Blackhorse

- 8.5 As set out in section 2.0 above an alternative site was put forward by landowners/developers for an urban extension to Exeter on land to the east of the M5 in the vicinity of Blackhorse and the proposed Science Park. A further consultation on this option commenced on 2 November 2009 and closed on 14 December 2009.
- 8.6 The Panel received a presentation in respect of this proposal from consultants Barton Willmore and Eagle One. The proposals for a 2,200 dwellings mixed use neighbourhood to the east of the Exeter Science Park were favourably received by the LDF Panel as a strategic proposal for growth to accommodate some of housing within the Area of Search identified by the Draft RSS. The proposal was felt to be well integrated with the Science Park and on the public transport corridor from Cranbrook into the city. The Panel wished to see work progress by the Council and the prospective developers on testing the delivery of the proposal.

### **Key Issue 6.**

**Any development option involving the land at Redhayes/Blackhorse should not put at risk the strategic objective of effective delivery of significant additional housing at Cranbrook and other identified sites in Exeter. It must therefore be set in the context of the established phasing and implementation programme for those sites and have regard to the capacity of the development industry to bring forward Redhayes/Blackhorse as an additional strategic site to those already identified.**

## Summary of the position on Cranbrook and potential West End developments

- 8.7 A second New Community would be very costly to deliver in terms of infrastructure and would raise grave concerns over the credibility of delivery. Cranbrook was first proposed in the Devon Structure Plan First Review adopted in 1999 but has yet to commence on site. A similar 10/11 year lead time for a second new community would mean the first houses being built in 2020/2021.
- 8.8 An urban extension of Pinhoe utilising the existing highway capacity (currently being assessed by Devon County Council) could be delivered relatively early in the plan period and come with a more modest price tag. However, there will be a threshold above which major highway expenditure would be required.
- 8.9 The area between the proposed Science Park and the River Clyst floodplain to the east could provide for a well connected and integrated residential neighbourhood well related to employment and provide a critical mass of housing and community facilities that would provide around 2,200 dwellings. However, the County Council, whilst recognising this additional option for securing the overall scale of growth projected for the area over the period to 2026, is concerned that this must not put at risk the delivery of a sustainable new community at Cranbrook, or of sites already identified for development within Exeter.
- 8.10 The expansion of Cranbrook to the east and west, with selective expansions to the south could provide 6,500 dwellings and still protect important planning objectives.
- 8.11 These strategic options could deliver 9,700 to 10,700 dwellings in the West End leaving the Council at least 6,400 dwellings (ie above the 'at least 5,600' figure in the RSS) to allocate to the rest of the district.

## Axminster

8.12 The Issues and Options Report set out three green field expansion options: to the north-west, to the east and to the south of the town. The Panel received presentations in respect of land to the North-west (Option 1) and land to the east (Option 2). See plan at Appendix 2.

- i) CSJ Planning Consultants gave a presentation in respect of land to the north of the town at Cloakham lawn – this site offers potential to accommodate 350 or more dwellings and employment uses. The site offers scope for early development, potentially over the 2010 to 2015 period. Site development would take place alongside provision of greatly enhanced sports facility provision at Cloakham Lawn.
- ii) The Panel had concerns about the adequacy of the sewage system and how surface water run-off would be dealt with but recognised that these were technical issues. The inclusion of sporting facilities was positively received as was the idea of incorporating allotments, although management of the open spaces and facilities will be an important consideration. As an aside members gave positive support for incorporating in the master plan opportunities to enable the relocation of the football club on adjacent land. The Panel were supportive in principle of the provision of some 300 dwellings as part of a mixed use development in this location and wished to see work progress on the technical documentation to support the proposals
- iii) Consultants Boyer Planning and Persimmon Homes gave a presentation in respect of land to the east Axminster – this site offers potential for around 750 dwellings and mixed use community and commercial facilities. This site offers longer term development potential which may well stretch beyond the 2026 time span of the Core Strategy. Provision of a north-south relief road has been identified as a desirable outcome for the town and development of this site will help facilitate provision.
- v) The Panel placed considerable importance on the provision of a relief road to alleviate congestion and address related highway safety and environmental impact concerns on the town centre. This points towards the need to assess how and in what way developments in Axminster, including any proposals in this location, could make effective and viable contributions to secure the provision of a relief road. The Panel were supportive in principle of substantial development east of Axminster, as part of a mixed use development and wished to see work progress on the technical documentation to support the proposals.

8.13 An allocation of 300/400 dwellings at Axminster in the period to 2026 would reflect past build rates in the town. A step change to a much higher building rate delivering around 1000 dwellings raises the issue of the relief road which, if it is to be delivered by a tariff on new houses built, would be likely to be provided after their completion placing pressure on the existing road network in the interim. The RSS requires the provision of 5,600 dwellings in the rest of East Devon and existing commitments and allocations account for 3,264 dwellings leaving a requirement to allocate sites for 2,336 dwellings. To allocate more than a third of this rest of East Devon requirement to Axminster increasing by 50% the number of households in the town (at the 2001 census there were 1839 households in the Axminster Town Ward) will require justification and is likely to be challenged by landowners/developers with interests in other towns, particularly at Exmouth and Honiton. Even if the rest of East Devon figure is increased to 6,600 dwellings in line with the Council's objections to the RSS 1000 dwellings would still represent over a quarter of the required allocation of 3,873 dwellings.

**Key Issue 7.**

**If the Core Strategy proposes both the Cloakham Lawn and east of Axminster sites this would provide in the order of 1000 dwellings. This would be a significant proportion of the RSS dwelling requirement for the rest of East Devon and this distribution of development may be subject to challenge by landowners/developers with interests in other towns, and also the Inspector would wish to be assured of the soundness of this approach.**

**Exmouth**

8.14 The Issues and Options Report set out three green field expansion options: to the north, to the east and to the south-east. See plan at Appendix 3. The Panel received presentations in respect of each option but Strategic Land Partnerships who were invited to make a presentation in respect of land to the north of Summer Lane, and Courtlands Lane, declined the offer.

- i) Consultant David Beardmore gave a presentation about land between Marley Road and Hulham Road north of Dinan way and forming part of Lovering Farm/Goodmores Farm.
- ii) The Panel responded positively to the presentation and considered the site as having potential for delivering an urban extension to Exmouth. The presentation indicated that the proposal would be able to finance the completion of Dinan Way to Exeter Road but this would impact on the ability of the development to deliver affordable housing or other infrastructure and a financial appraisal would be required.
- iii) Consultant David Beardmore gave a presentation in respect of land to the east of Exmouth, off St John's Road. The Panel responded positively to the presentation and considered the site as having potential for delivering an urban extension to Exmouth. However, it was recognised that there were question marks over the delivery of this site particularly in achieving adequate access and further work was required to support the proposal.
- iv) Consultants Bell Cornwell and representatives from Clinton Devon Estates gave a presentation in respect of some 22 hectares of land to the south east of Exmouth in the Littleham Valley proposed for residential development. The developable area of 11 hectares would provide between 330 and 500 dwellings depending on density. They also made a presentation about a northern extension to the Liverton Business Park to provide 3.85 hectares of developable land for employment delivering approximately 100,000 sq ft of business space.
- vi) The presentations were positively received by the Panel with the sites thought to have potential for delivering an urban extension to Exmouth and employment/commercial land, well related to key facilities, services and public transport. The Panel wished to see work progress on the technical documentation to support the proposals.



**Key Issue 8.**

As by far the largest town in East Devon Exmouth could be expected to accommodate a significant portion of the growth required by the RSS in the rest of East Devon. One of the options in the Issues and Options report was for very high levels of growth of 2000 dwellings or more although it was recognised that this would have to be accompanied by major employment expansion to avoid reinforcing the high levels of commuting to Exeter. On the basis of the work done to date about 1000 dwellings could be delivered at Exmouth coupled with expansion of the Liverton Business Park and a new employment area at Lovering Farm. The need for the completion of Dinan Way limits the potential for delivery of affordable housing or other infrastructure at Lovering Farm. There is a need to consider a mechanism whereby all new development in Exmouth contributes to improved public transport in the A376 corridor.

**Honiton**

- 8.15 The Issues and Options Report set out four greenfield expansion options for Honiton: to the north, east, south and west. See plan at Appendix 4. The Panel received presentations in respect of land to the east (Option 2) and west (Option 4) and land to the south west (part of Option 3)
- i) Consultants Broadway Malyan gave a presentation for proposed residential development on land forming part of Option 3 to the south west of Honiton within the East Devon Area of Outstanding Natural Beauty. The Panel considered that this site would deliver a relatively low number of houses and that access would be difficult. Members had concerns as to whether the site had the potential to form a strategic allocation but noted that the site was being assessed as part of the Strategic Housing Land Availability Assessment (SHLAA).
  - ii) Consultants Savills gave a presentation in respect of land to the west of Honiton both north and south of the railway line for a mixed housing and employment development. The Panel felt that this area was important for securing employment development for the town (provided business types did not compete with the town centre) but, given the distance to the town centre, residential development was less important. The Panel recognised the need for roads improvements at the Turk's Head junction and felt that an additional slip road on to the A30 would be a potentially attractive option. Members felt there was merit in advancing the technical studies that would be required for a potential strategic allocation.
  - iii) Consultants Pegasus Planning Group gave a presentation for proposed housing and employment development to the east of Honiton. Subject to the provision of an eastern by-pass the Panel supported the principle of developing in this location for housing and some employment and recognised the need for community infrastructure, and for phased housing provision. The Panel were concerned that the existing A35 acts as a barrier to movement in Honiton and were keen to explore the possibility of development in this location contributing to a by-pass. Members felt there was merit in advancing the technical studies that would be required for a potential strategic allocation.

#### **Key Issue 9.**

**Whilst the Panel supported provision of an A 35 Eastern By-pass to Honiton it is clear that the cost of either the previous Department of Transport scheme or a smaller scale alternative scheme closer to the town is prohibitive and could not be funded by residential development to the east of Honiton. There is potential for development to the west, both for residential and employment development but highway issues at the Turk's Head junction would need to be overcome. Residential development to the east or west would elongate the town further making walking or cycling to the centre less attractive. There is an opportunity for limited residential development to the south west but this would encroach into the East Devon Area of Outstanding Natural Beauty. It may therefore be necessary to scale back the initial housing figures suggested for the town to around 500 dwellings**

### **9.0 Rural Housing and Development**

- 9.1 The need for more affordable housing in villages has been raised on many occasions in Panel meetings and rural housing and development was the main topic discussed at the Panel meeting on 9 December 2009. Three subject areas were discussed.
- 9.2 The first was the messages to be gained from Parish Plans on rural development. In brief these were that the closure of village shops and post offices, falling school rolls and consequent threat of closure have resulted in an acknowledgement that even quite small villages need to have a limited amount of new housing development if they are not to lose the younger generation. The problem is exacerbated by second home ownership. Affordable housing is the main requirement and some villages would be happy to see such provision for local people but sheltered housing for ageing residents was also seen as desirable.
- 9.3 The second area of discussion was the options for rural development in the context of Government policy and the RSS Development Policy C for Development at Small Towns and Villages. The options discussed were: 1. Maintaining the status quo, 2. Restrict development to market towns only, 3. Allocated sites only (remove all Built-up Area boundaries), 4. Affordable housing/local needs as drive, 5. Community Participation/Use of Toolkit.
- 9.4 The third area of discussion was the possible overall distribution of housing development in the rest of East Devon for the period 2006 to 2026 to meet the RSS requirement for 5,600 dwellings (which the Council wishes to increase to 6,600 dwellings by restricting Cranbrook to 6,500 dwellings and transferring the balance of 1000 dwellings to the rest of East Devon). Existing completions and commitments (sites with planning permission) and local plan allocations in the rest of East Devon total 3,264 dwellings leaving a requirement for 2,336 dwellings against the RSS figure and 3,336 against the Council's preferred figure. As an illustration, if allocations were made in the towns as follows: Axminster 1000 dwellings, Exmouth 1200 dwellings, Honiton 500 dwellings, Ottery St Mary 300 dwellings, Seaton 300 dwellings, Sidmouth 300 dwellings this would total 3,600 dwellings. There is therefore unlikely to be a requirement for growth in the small towns and villages and, subject to a defensible basis for the distribution of development, any provision can be largely driven by the need to meet local needs. For many villages there will be a choice as to whether they wish to keep their existing Built-up Area Boundary with any affordable housing coming forward as exceptions sites or whether to make allocations for a mix of affordable of market and affordable housing to encourage provision.

**Key Issue 10.**

**A modest allocation of 25 dwellings to 9 small towns/large villages and 10 dwellings to each of the other 52 villages (with and without Built-up Area boundaries in the Local Plan) would total 745 dwellings. This would exceed the RSS requirement but would make little impact on the affordable housing requirement in rural areas over the 20 year period**

## **10.0 Core Strategy Production Timetable for 2010 and Beyond**

### **Document Preparation, Engagement and Evidence Gathering Stages (2011)**

- 2 Feb 2010 – report to Overview and Scrutiny Coordinating Committee on LDF Panel work to date and other LDF related work.
- February/March 2010 – invite feedback on above.
- February/March 2010 – Hold workshops in six main towns.
- February/March 2010 – Consultation with Parishes/rural areas on rural issues.
- April/May 2010 – Prepare/finalise a preferred options type consultation document.
- May/June 2010 – Take above through committee.
- June/July/August 2010 – Consult on preferred options report.
- Ongoing – through spring/summer/autumn 2010 - prepare submission document.
- October/November 2010 – Take proposed submission document through Development Management Committee and Full council.

### **Submission Stages and Steps and Examination (2010, 2011 and 2012)**

- December 2010 / January 2011 – formal (submission) publication consultation.
- February/March/April 2011 – Collate responses to publication consultation.
- Document Submission – June 2010
- June/July/August 2011 – organise/prepare for Examination
- September 2011 - Pre-Examination Meeting
- late 2011/early 2012 – Examination.
- Early 2012 – Receive Inspector's Report.
- 2012 – Adopt Core Strategy (assuming sound examination report is received).

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The above is dependent on a number of issues including:

- Staff resource availability (to meet the above would require additional staff);
- Financial resource availability (current policy team funds/future budgets might just meet costs but there would be minimal potential to commission external work and if the Examination was longer than average length available funds would be insufficient);

- the South West RSS,
- desirability of consulting in the summer holiday period;
- possible local Govt reorganisation in Devon; and
- general election timing/outcomes, etc.

Key potential additional Work areas – in addition to tasks directly associated with above:

- a) Produce infrastructure delivery plans.
- b) Refine/undertake additional evidence gathering – could include:
  - Town functionality assessment:
  - Rural areas study.
- c) Monitoring (esp. housing and employment).
- d) Strategic Housing Land Availability assessment.

## 11.0 CORE STRATEGY FINANCE

11.1 The table below sets out monies available in the 2009/10 budget and possible 2010/11 and 2011/12 budgets.

11.2 It is assumed that Housing and Planning Delivery Grant of £9,915 awarded in 2009 (for performance in the 2008/09 year) and shown in the 2010/11 budget figures will be available for the Planning Policy section to spend. No estimated provision is made for future years. The table below identifies £195,695 as available for Core Strategy production (staff wages are excluded).

LDF Funds	Account	Available Funds 2009/10	Available Funds 2010/11	Available Funds 2011/12
Planning Delivery Grant (past grant)	Maintained in Holding Account - reclaimed against 43-411-3460	£138,945		
Housing and Planning Delivery Grant	Grant for performance in 2008 shown in 2010/11 budget.		£9,915	
Consultants Fees	43-411-3460	£10,000	£10,000	£10,000
Habitat Regulations Work	43-411-610 Costs incurred in respect of Habitat Regulations work	£16,835	£0	£0
<b>Annual Estimates for LDF Work</b>		<b>£165,780</b>	<b>£19,915</b>	<b>£10,000</b>
<b>Total Projected Available Funds for 3 Years - 2008/09, 2009/10 and 2010/2011</b>		<b>£195,695</b>		
Expenditure provision is also made in Council budgets in respect of the following items. It is assumed that funds will cover LDF tasks and costs not tabled in the section below:	Copier Click Charges, Consumables, Stationery, Internal Xerox Printing Chg, Books And Pubs, Licences, Internal Postage Recharges, Postal Serv Overhead, Cleanmail Postage, Phone Mobiles Rechg, Phone Land Lines Rechg, Broadband Rechg, It Software Purchase, It Software Annual Costs, Professional Bodies Meetings, Conf Expenses, Subsistence, Advertising Gen, It Hardware Purchase. These items are not included in the above.			

## 12.0 CORE STRATEGY PROJECTED PRODUCTIONS COSTS

12.1 The next table sets out what are deemed to be minimum costs (excluding staff time) for Core Strategy production (the table includes currently committed expenditure and also projected future expenses). It should be noted that all figures are best estimates as at January 2010 and will need finer scrutiny and assessment. They do, however, present an overview of available funds and possible costs.

Projected Costs - Core Strategy	Notes	Expenditure 2009/10	Expenditure 2010/11	Expenditure 2011/12
Social and Community Infrastructure Study	Ongoing Study commissioned jointly with The New Growth Point Team, Exeter City and Teignbridge District	£30,000		
Agency Staff Fees	The three agency planners cost around £47,000. Around £18,000 was covered in money saved from staff wages in 2009/10. The identified expenditure is a net figure.	£29,000		
Sustainability Appraisal	Work Commissioned in August 2009	£25,000		
Habitat Regulations Assessment	Work Commissioned in 2009	£8,000		
Affordable Housing Viability Study	Required Under Govt Guidance - internal staff do not have expertise to do this work.		£15,000	
Town focussed public consultation events	Proposed to hold six one day events - in Axminster, Exmouth, Honiton, Ottery St Mary, Seaton and Sidmouth.	£6,000		
Planning Inspector Fees	£50,000 would be a typical Planning Inspectorate fee for an average Core Strategy Examination. (See Note Below)		£10,000	£40,000
Programme Officer Costs	The programme office organises the workload for the Inspector and deals with correspondence and programming.		£3,000	£7,000
Contingency Funds	Other work might need to be commissioned/ additional expenses incurred. An estimated £30,000 is set aside for this.	£0	£15,000	£15,000
<b>Annual Projected Costs</b>		<b>£98,000</b>	<b>£43,000</b>	<b>£62,000</b>
<b>Total Projected Costs 3 Years - 2009/10, 2010/11 and 2011/2012</b>		<b>£203,000</b>		



## **Planning Inspectorate Costs**

- 12.2 The Planning Inspectorate costs for a typical examination can be expected to be in the region of £50,000. The figure used in the table This is based on 6 sitting days of examination and 8.5 total working days for each sitting day. This equates to 51 days at £993 per day. The expectation is that the East Devon Core Strategy examination could be longer and more complex than usual Core Strategy examinations. The West End issues are complex and could be expected to add to the examination time and also making strategic land allocations could involve a more lengthy examination. Therefore it would be prudent for the Council to note that additional examination expenditure may arise.
- 12.3 The above table lists only those work areas/studies that are deemed essential for Core Strategy Production. The list does not include studies completed to date (or ongoing studies where no outstanding bills exist). Also the table does not include details of studies that have been commissioned or are being undertaken by third parties (with no financial contributions from East Devon District Council) that will/could inform the Core Strategy or relevant 'in-house' studies.
- 12.4 It is stressed that these projections are working best case (cheapest) minimum estimates. They assume, for example, that at examination we do not have a barrister or employ expert witnesses to present evidence. The assessment assumes that money to pay for printing, postage, basic exhibitions and the similar items will be available in the general Planning Policy team budgets to cover these aspects of LDF work and production.
- 12.5 Overall expenditure to take the Core Strategy through examination and to adoption (not including staff costs) is suggested (as a minimum) to be around £203,000. This figure is just over £5,000 more than projected available funds. A longer than average examination (a real likelihood) would result in substantially higher Inspectorate fees. Whilst additional consultant studies may be required, especially if the Core Strategy is to cover more than minimal key issues. Therefore it would be appropriate to plan for cost over-runs and use may need to be made of money in reserves if the Council is to meet its legal requirements of producing a Core Strategy.

## **13 Available Staff Time**

- 13.1 Planning Policy Section staff time is now dedicating almost entirely to Core Strategy production and allied tasks only. Allied tasks include the time consuming activities of Strategic Housing Land Availability Assessment and monitoring.
- 13.2 The Planning Policy Team at present comprises of 4 full-time equivalent planning policy officers and 1 full-time equivalent administrative post. The Planning Policy Manager has advised of his likely retirement in April 2010. Assessment in 2009 indicates that the Planning Policy team at East Devon District Council is currently the equal smallest planning policy team of all Devon authorities (with the exception of Dartmoor National Park). This is despite the District being amongst the largest of Devon authorities and having one of the highest population levels.
- 13.3 The Planning Advisory Service report recognised that although the Council sees the Core Strategy as one of the key documents, this is not reflected in the resources allocated and the priority given to it by the authority. The revised line reporting arrangements with the Planning Policy team reporting through the Head of Development Management to Karime Hassan, Corporate Director, will enable staff resources to be made available from Development Management Team to assist in Core Strategy work.
- 13.4 Key demands on Planning Policy officer staff time over the next two years will include the following (the list is far from exhaustive of all tasks):

- a) Preparing drafts of the Core Strategy (preferred Options and submission document).
- b) Planning for and undertaking consultation.
- c) Collating consultation responses.
- d) Preparing technical working papers to assess/support/justify policy choices.
- e) Preparing and presenting evidence at examination.
- f) Producing an implementation plan.

13.5 It should be noted that no money/time is identified for production of other Development Plan Documents.

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### **Legal Implications**

The report explains the statutory framework applicable to consultation and preparation of the Core Strategy, and risks of not complying with procedures. The costs of any possible legal challenge in the event of non-compliance are not quantifiable at present.

### **Financial Implications**

There is a sum of approximately £140,000 held in reserves for the purpose of producing the LDF.

### **Background Papers**

Secretary of State's Proposed Changes to draft Regional Spatial Strategy July 2008

Planning for the Future: East Devon LDF – Issues and Options Consultation Report, December 2008

Planning for the Future: East Devon LDF – Issues and Options further Consultation on an option for an urban extension to Exeter at Redhayes/Blackhorse November 2009

The completed studies listed in paragraph 6.1 of this report

John Maidment Planning Policy Manager

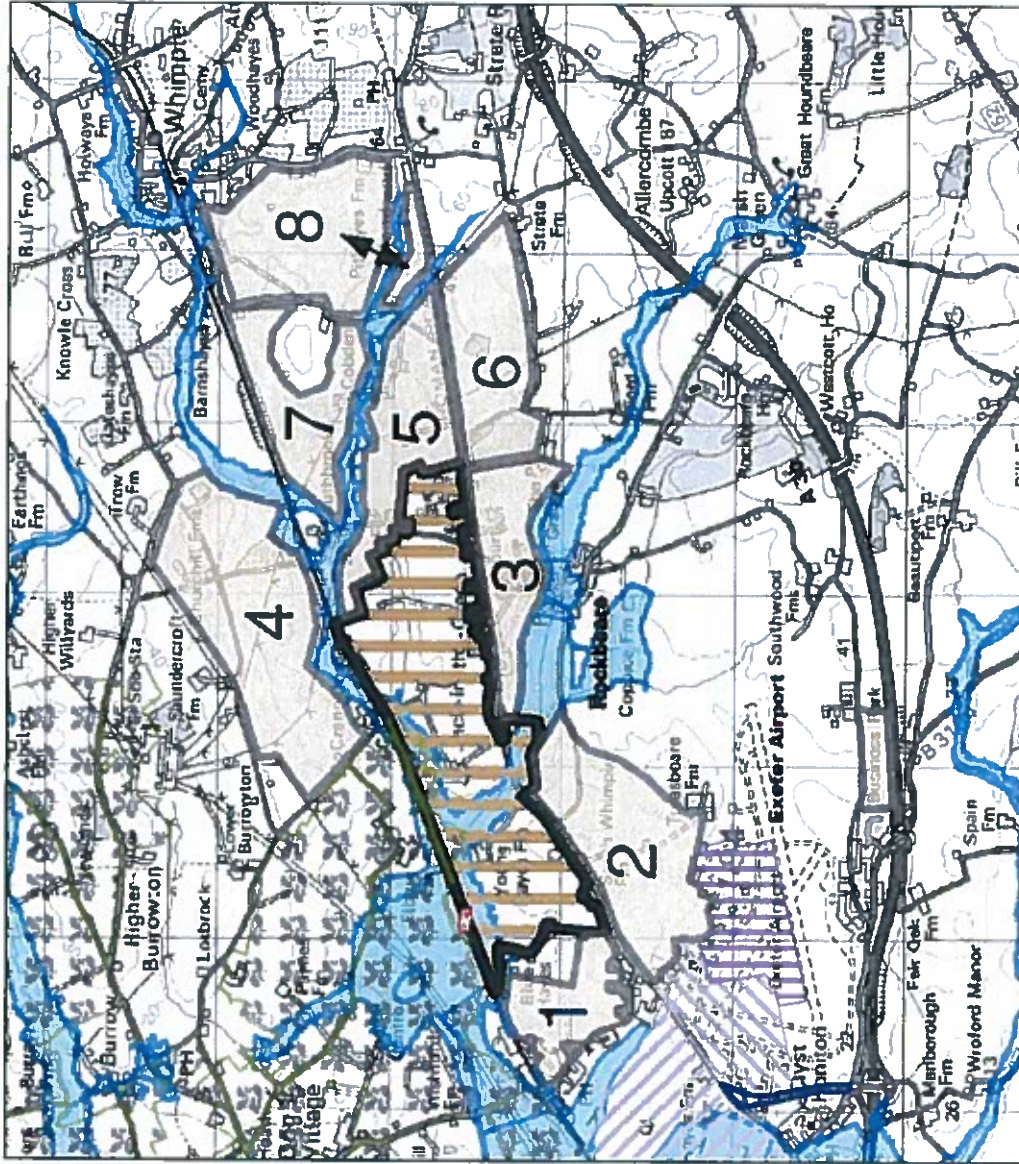
Overview and Scrutiny Coordinating Committee

Matt Dickins Principal Planning Officer

2 February 2010

Appendix 1

Cranbrook Expansion Options



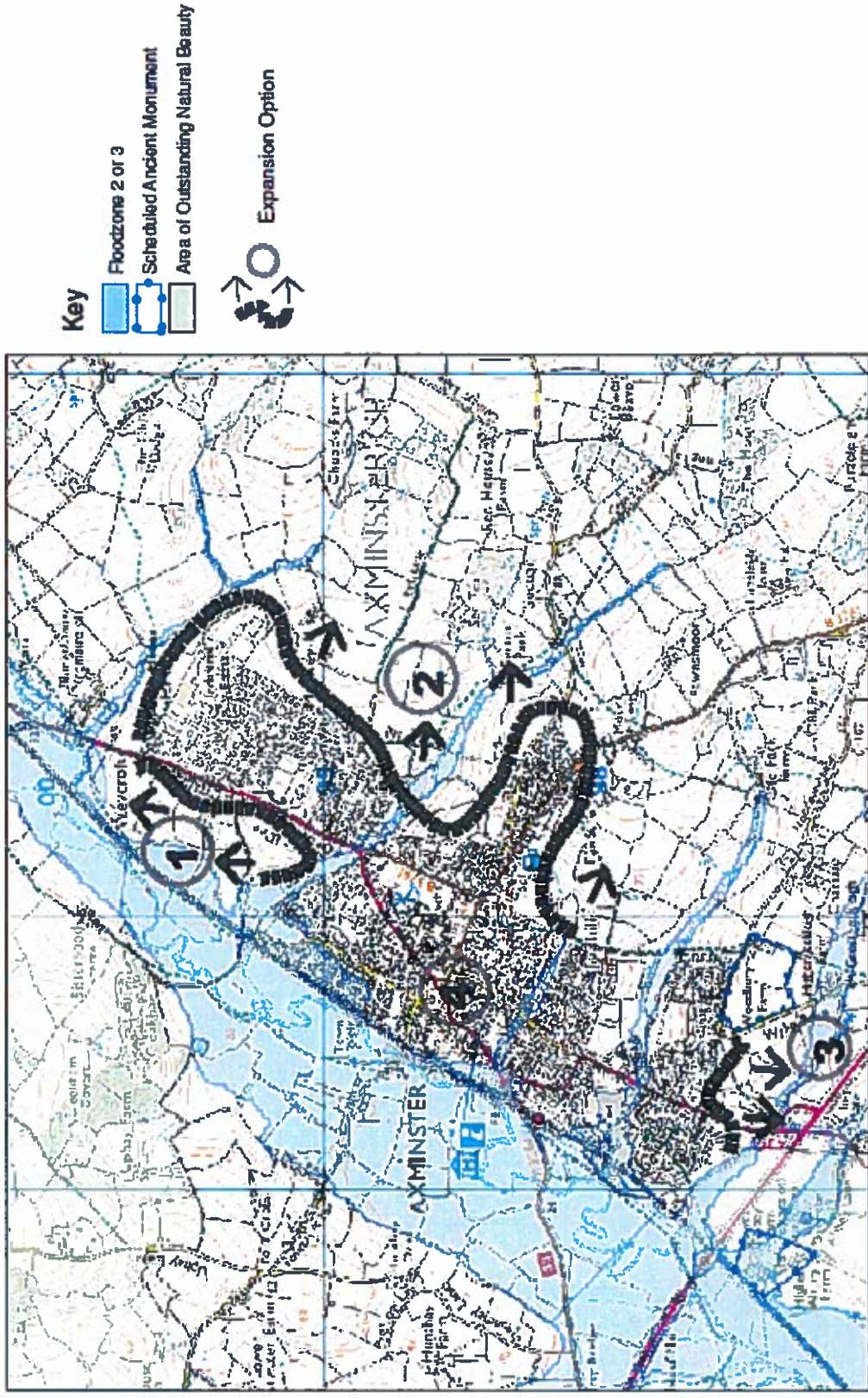
-  Cranbrook Expansion Options
-  Proposed Railway Station
-  Site of Intermodal Freight Facility
-  Clyst Honiton Bypass
-  Airport Terminal Development Site
-  Skypark
-  National Trust ownership
-  Cranbrook New Community
-  Floodzone 2 or 3

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Appendix 2

# Axminster Town Expansion Options

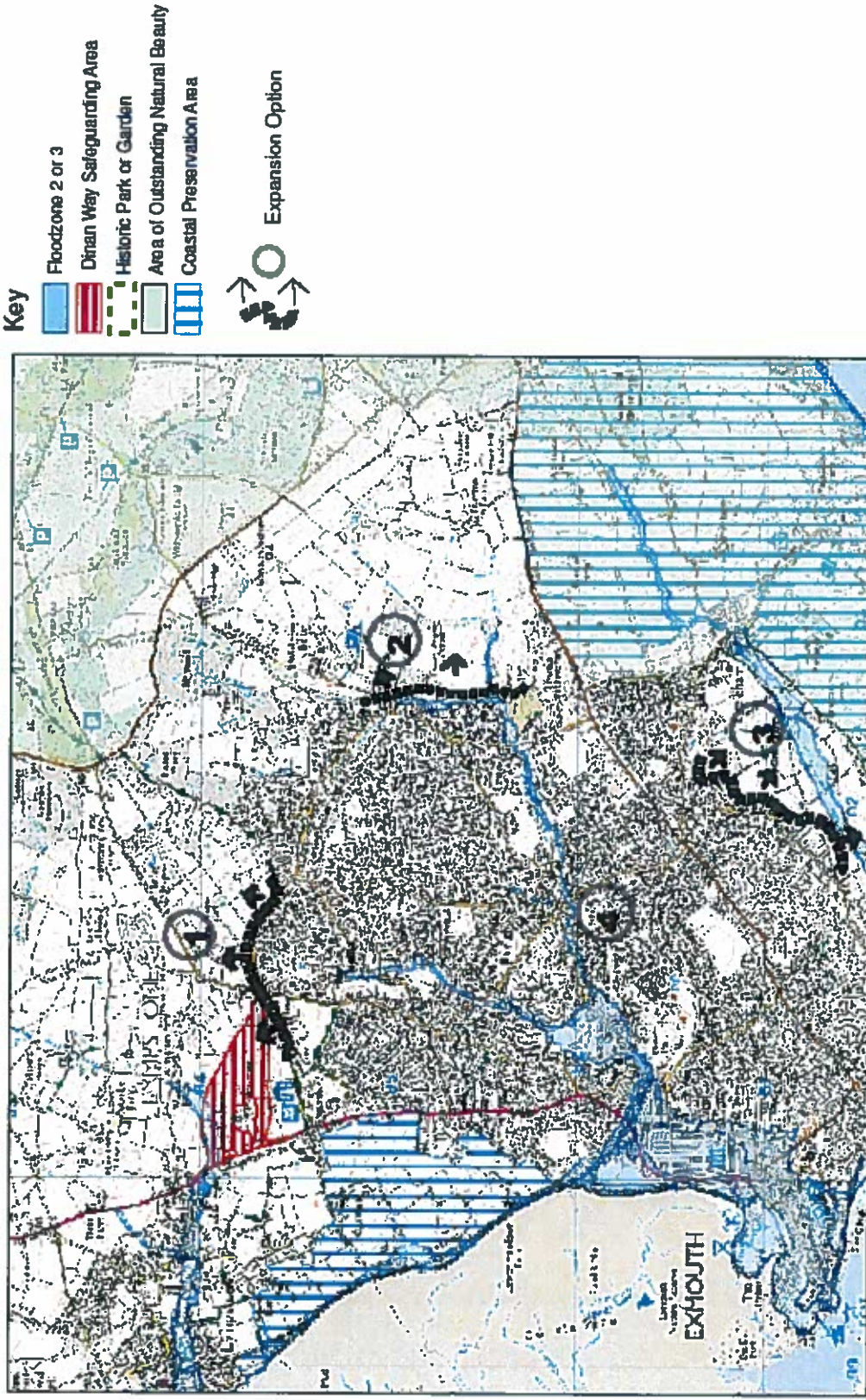


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# Appendix 3

## Exmouth Town Expansion Options

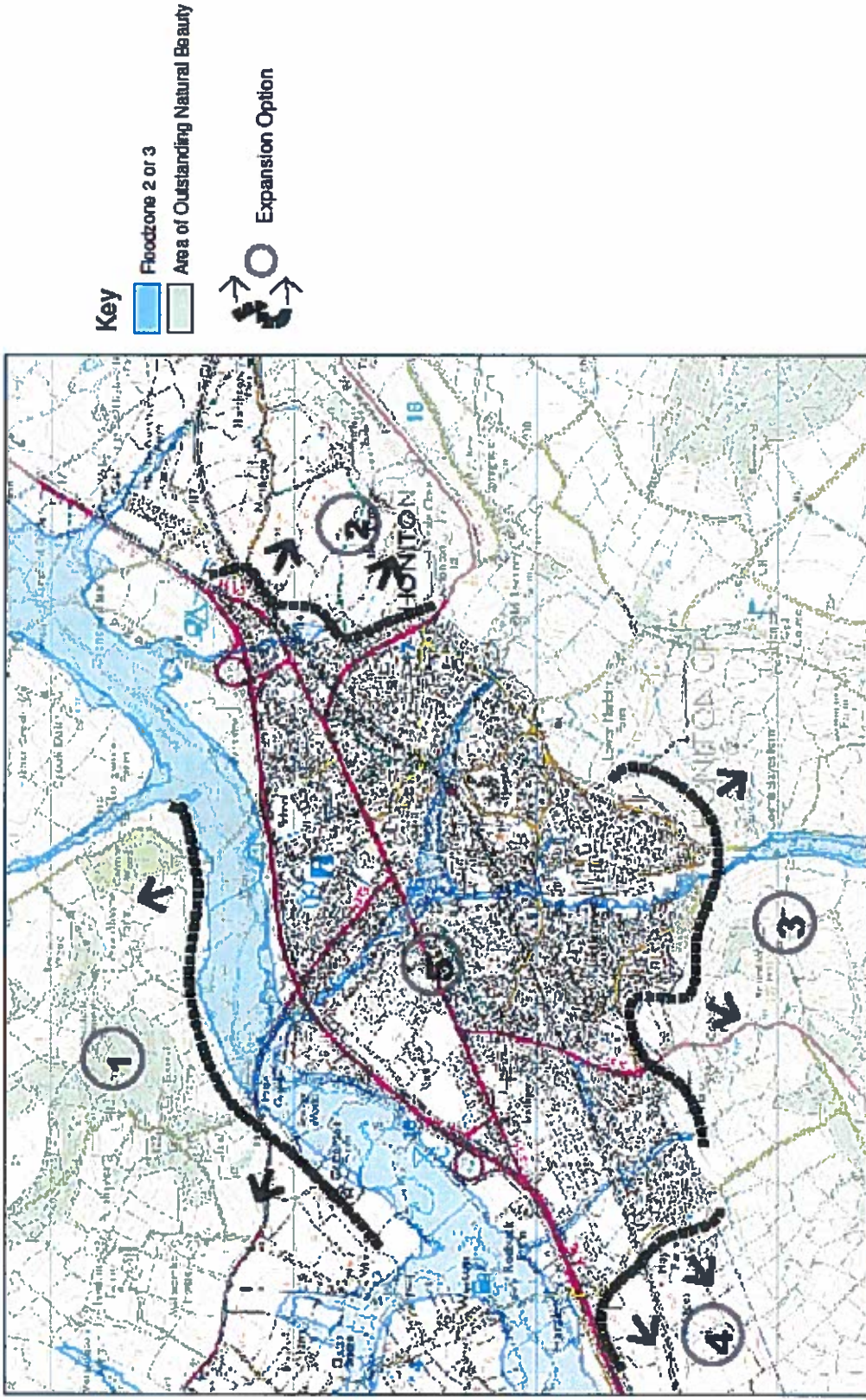


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Appendix 4

# Honiton Town Expansion Options



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## Appendix 5

### Planning Advisory Service : East Devon Local Development Framework Diagnostic Report



**Planning Advisory Service**

**Final Local Development Framework diagnostic report**

**East Devon District Council**

**Date of visit: 8 October 2009**

**Introduction**

Spatial planning is about managing change in places. It seeks to effectively spatially integrate strategies prepared by local authorities and their partners and help to deliver the objectives of Sustainable Community Strategies and the programmes set out in Local Area (and Multi-Area) Agreements. The approach to developing a Local Development Framework (LDF) is therefore fundamentally different from that used for putting together a Local Plan. It is not possible for effective spatial planning to be done by planners working in isolation. Effective plans require officers, members and partners to collaborate - collecting evidence, sharing information and developing alternative options for the future of their areas. It also needs innovative and inclusive engagement with all sections of the community providing clarity about aspirations and being realistic about what can be achieved with the resources available. It requires vision, direction and leadership, and the ability to make tough choices and difficult decisions.

For the LDF to be effective it is recognised that local authorities need to develop their skills and be supported to ensure that they have the right processes and culture in place. The Planning Advisory Service (PAS), as part of the Local Government Association family, is available to provide such support. It does so by undertaking a diagnostic review that looks at how an authority is going about its plan making. A consultant, appointed by PAS, has undertaken a review of key documentation and has interviewed a cross-section of officers, members and partners to assess the governance arrangements, organisation, culture and resources throughout the authority that are working on the LDF. This report sets out their findings. They have not tested the soundness of the plan itself. The report also sets out a series of recommendations identifying areas that would benefit from support through packages and tools available from PAS, and where the authority should consider further action. The review has identified areas of

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good practice in some cases where it would be beneficial to share what has been done with the wider local government community.

**Executive Summary**

The Council's priorities have shifted in the last few years from one of landscape protection to promoting economic development and the provision of affordable housing. The Council has accepted the growth proposed in the RSS and this was acknowledged in the Issues and options consultation in 2008. The Council's target as set out in the corporate plan has been the delivery of 200 affordable homes per annum and to deliver at least one rural based housing scheme. Until recently they were anticipating that the new community at Cranbrook would deliver much of the affordable housing needs but this major development has been slowed by the downturn in the housing market and no housing has yet been built. This, coupled with a limited housing land supply, has led them to look at bringing forward other sites ahead of the LDF to meet the projected shortfall. Although the Local Plan was adopted as recently as 2006, this no longer reflects the corporate priorities. This has led to concerns by some that members and the LDF Panel have placed more focus on identifying possible development sites to meet the 5 year land supply rather than evaluating different options and alternatives for the core strategy. This may have resulted in a tendency to operate on a reactive basis to the immediate concerns rather than considering such issues in the wider corporate context of promoting/achieving the wider core strategy objectives.

The establishment of a cross party LDF members panel in 2008 is good practice. However, following the Issues and options consultation, the recent focus of the LDF panel appears to have been on considering strategic allocations rather than articulating and achieving ownership of a wider common spatial vision about the "shaping of the place" and where they want to go to now. Although the vision for the West End of the district is clear, and appears to be shared, this is less clear for the rest of the district other than a general view that there should be some housing growth. There is a need to articulate and develop this wider vision and to share the key messages from evidence obtained with internal/external partners and to ensure that the core strategy is seen as a corporate document helping to achieve the council's objectives rather than a land use planning tool.

Senior management and members understand the purpose of producing an LDF but it is not clear that this understanding is more widespread and extends outside of the growth area. Although the core strategy is seen as one of the key documents, this is not reflected in the resources allocated and the priority given to it by the authority. Urgent work is needed to consider the resources available for the LDF, particularly in the context of the council reviewing its budget for next year to achieve efficiency savings and the growth point funding which is only guaranteed until March 2010. Involvement of key stakeholders and partners, and

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the preparation of an Infrastructure delivery plan owned by the LSP, is urgently required.

**Part A**

***Recommendations for support***

Following the review, we recommend that PAS support tools and packages are used in the following areas, listed in order of priority:

***Using the current support modules:***

- R1: Delivering the common vision:** Advice and support around how to bring key stakeholders together in order to develop and agree the delivery of a common spatial vision linking across strategies and administrative boundaries. This will also include collaborative working to identify barriers to the delivery of the vision and identification of the ways forward. A two-part support package including a workshop day and subsequent support is available.
- R2: Effective community engagement:** Advice and support in developing the engagement strategy for the core strategy between now and submission including how the council can use suggested consultation tools and techniques to effectively engage with the community.
- R3: LDF project management and resource planning:** Support to develop the officers' skills in applying the principles, tools and techniques of project management specifically to cover the LDF and to develop a project plan including resource analysis to deliver the core strategy and a revised LDS.
- R4: Spatial planning:** Guidance to help create a greater understanding of spatial planning practice amongst planners, senior managers, partners and councillors, making clear the role of spatial planning and how it relates to the Sustainable Community Strategy, the LSP and the Local Area Agreement including a day workshop to explore spatial planning in practice.
- R5: Evidence base:** Guidance on assessing the coverage and robustness of evidence and provision of advice on key issues to be considered during the evidence gathering process and dissemination of key messages to partners.

***Possible additional areas of support from an external source***

- R6: Establish an Infrastructure Delivery Group for East Devon –** using support from the county to prepare terms of reference and provide links into stakeholder organisations to enable an effective group to be established.
- R7: Using ICT for the evidence base and monitoring:** Support aimed at maximising the use of an integrated ICT system for maintaining an appropriate evidence base.

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***Recommendations for action by East Devon District Council***

Following the review, we recommend that action is taken in the following areas, listed in order of priority:

1. Review the current LDS programme with respect to the time and resources allocated.
2. Use the corporate management team to set up a mechanism for engaging senior officers across the authority in the LDF and to discuss proposals on key sites at an early stage and to get a corporate view
3. Set up an officers group to ensure effective liaison across the authority and key stakeholders to discuss the LDF and achieve input to feed into the LDF members panel discussions
4. Ensure that there is regular liaison between the planning policy team, the sustainable community strategy team and development management teams
5. Obtain ownership of the sustainability objectives by the LDF members' panel and use these as a tool to help evaluate potential strategic allocations

**Part B**

***Current position***

The proposed changes to the draft regional spatial strategy for the South West were published in July 2008. Following public consultation the Secretary of State intended to publish the final Regional Spatial Strategy at the end of June 2009. However, on the 20 May, the High Court issued a judgement that the previously issued Regional Spatial Strategy for the East of England had failed to meet certain requirements of the Strategic Environmental Assessment Directive, in respect of three towns. The Department of Communities and Local Government and the Government Office for the South West have considered the implications for the Regional Spatial Strategy for the South West and now intend to carry out a further appraisal of whether the proposals for the Regional Spatial Strategy for South West England are the most sustainable way forward for the region.

The current statutory Development Plan for the area therefore includes the saved policies in the Devon Structure Plan and the East Devon Local Plan. The LDS has not been reviewed since 2007 and the Council is way behind the proposed timescale set out in that document which had projected the core strategy to be adopted by September 2008. The two Action Area Plans included in that scheme (Axminster and East of Exeter) are no longer being progressed as strategic allocations will now be included in the core strategy. The Council went out to consultation on issues and options between December 2008 and February 2009 and the responses have been reported back to the LDF Panel and will go to Full Council in December 2009 with a progress report on the Panel's work. The LDF Panel is now looking at strategic allocations with a 'preferred options' type

consultation planned for early in 2010 and submission later that year.

Exeter and East Devon has been awarded new growth point status. A new growth point team was established in 2007 administered by East Devon District Council but working jointly with Exeter City Council, Teignbridge District Council and Devon County Council, with funding until March 2010. The team is working to realise the full economic potential of Exeter and the west end of East Devon as a major regional centre. The aim is to provide a sustainable new community and a range of employment opportunities, including a science park, a strategically important business park, an expanded airport and inter-modal rail freight facility. Since the establishment of the growth point team, they and the policy/LDF team are in a separate directorate to the development management team.

An LDF member panel was set up in 2008 with a cross party membership of six. It has met frequently since its establishment and is currently meeting every fortnight. The LDF Panel is not a committee and does not therefore have decision making powers. Meetings are not open to the public although any member of the Council may attend meetings as an observer and outside parties may be invited to make presentations to the Panel. There is no officer's group to discuss the LDF.

Based on the information available it would appear that the following good practice is evident and the key issues that may affect progress on the LDF, or are significant to the authority, are:

**A Achieving outcomes**

A1: There is a clear spatial vision for the 'West End' of the District – the growth area identified to the East of Exeter which is largely based around committed projects and schemes. The spatial vision for the rest of the area is less clear and it is hoped that this will be shaped as the LDF progresses although the process for this has not yet been agreed. There was a series of visioning exercises with each of the towns three years ago but this has not been followed up. The core strategy is still seen very much as a planning rather than a corporate document and at the time of the visit the Corporate Management Team had not discussed the LDF in the last twelve months.

A2: Although there are good working relationships with lots of agencies these have not yet been tied into the LDF process. The LDF is very much still seen as a land use planning document and there is not yet sufficient engagement from other partners. The planning policy team therefore seem to be developing the elements of an emerging vision in isolation. Recently some partners have been invited to give presentations to the LDF Member Panel e.g. SW Tourism and others will be invited similarly but these



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relationships need to be developed through ongoing engagement especially through the Local Strategic Partnership (LSP).

- A3: The LSP are aware of the LDF but the availability of time and resources means that their involvement has been very minimal to date and on an ad-hoc basis. The LAA has not been picked up to any degree as yet or thought about in relation to how to articulate and achieve its objectives through the LDF. An Infrastructure Delivery Plan and the pulling together of the capital programme to deliver the council's aspirations needs to be put in place. This should be taken through the LSP. A recent presentation to the LSP to start the process on this and to connect this work with the Homes and Communities Agency did not unfortunately happen. This needs to be re-arranged.
- A4: The Council is very keen to deliver on its corporate objectives. It is concerned that despite growth point status and plans for growth at Cranbrook, there has to date been no development. So far therefore there has been no delivery of its key objectives of economic development and the provision of affordable homes. This, together with a concern about land supply – the last annual monitoring report showed only a 5.2 year land supply (the SHLAA work is not yet complete), has made the authority look for alternative sites for housing. The LDF Panel has started to undertake site inspections and receive presentations from land owners on strategic land allocations as part of its evidence gathering for the LDF. Where these sites are consistent with the RSS the Panel is giving a steer to the land owners to undertake further technical work.

However, there is a potential danger that a positive steer from the Panel that these are suitable sites is leading to the initiation of premature pre-application discussions for sites which would be 'departures' from the current development plan. Although the LDF views are given without prejudice they appear to be being made without the scenario testing of alternative options, the use of sustainability appraisal and the explicit assessment of how they fit in with the long term vision. The development management team (although in attendance at the Panel) and other key stakeholders appear not to be involved in early discussions prior to the presentations to the Panel. This is creating a tension as the development management team feel that sites are coming forward which are not consistent with the development plan or delivering the key corporate priorities but possibly are to deliver other objectives e.g. roads. There is concern that this is seen as reacting to local agendas rather than positive planning towards a long term vision for the district and likely to lead to ad-hoc decisions being taken. A mechanism needs to be established to ensure this is not the case and that there is a more open debate perhaps through the corporate management team.

**B Integration and collaboration**

- B1: The LDF is still very much perceived within the authority as a planning document led by the planning policy team. Although planning is viewed as an important function of the authority it is not yet embracing the spatial planning links to the sustainable community strategy that it should be. The integration of partners' plans is still very reliant on policy officers' interpretation and the lack of an officers' working group means that there is no effective method of sharing future plans, pulling together the corporate strands and providing a forum for debate.
- B2: There is some evidence of more joined up working on individual issues. For example, a virtual affordable housing team was recently established and a draft interim housing policy has been developed because of concerns of delivery on affordable housing for the rural areas. The interim policy which is currently out for consultation will allow for housing development at and near to villages (beyond existing Local Plan built-up area boundaries) in the district for a mix of market and affordable dwellings. However, this is seen by some as a sign of a reactive response to immediate circumstances rather than a positive proactive response to achieving wider objectives. There is concern that it will encourage further decision making by the development management committee on an ad-hoc basis rather than in relation to achieving the strategic vision. It is not also clear in developing this draft policy what account has been taken of evidence gathered for the LDF.
- B3: There is good collaboration and joint working with the Growth Point Team with a lot of commissioning of joint evidence. Consultants have been employed and are being managed by the growth point team to do an extensive piece of work to identify the infrastructure needs for the whole of the district which should be ready by the end of 2009. There has been little progress on an Infrastructure Delivery Plan outside the growth area but this work should provide a much clearer picture on the needs outside the growth area and inform any strategic allocations. A Joint Strategic Needs Assessment has been undertaken with the county which will feed through into the health and social infrastructure needs. The county is producing infrastructure plans for all the main towns which is GIS based. The county has been involved in facilitating the setting up of stakeholder planning groups to work on Infrastructure Delivery Plans in other parts of the county but there is as yet no such group in East Devon. The SHLAA is being undertaken to a common methodology agreed by the authorities in the Exeter Housing Market Area..

**C Leading and engaging the community**

- C1: A series of workshops were held with town and parish councillors in October 2007 about creating quality places and quality spaces to gain an understanding of their views and opinions on how the council might plan for future development in the context of the proposals in the draft RSS. The issues and options consultation was done in a conventional manner. There is a corporate consultation strategy and a statement of community involvement which has not yet been adopted. The engagement programme from now until submission of the core strategy is yet to be produced but will probably include workshops in the 6 towns prior to the 'preferred options' consultation. This means that the community and interested parties are not aware of the nature and timing of consultation that will be the most relevant to them. To date there has been very limited discussion and engagement with stakeholders and this should be improved.
- C2: There is good engagement with the members of the LDF Panel and all reports go to the Development Management Committee prior to Full Council but little involvement beyond this formal process. There is concern that backbenchers are not very connected. As ward members are not sufficiently involved they tend to be parochial rather than strategic in their outlook and only able to consider the effects on their wards rather than helping the authority to develop and deliver a clear vision for the area as a whole. This is seen in their input to the Members Advisory Panel (a panel which feed in the views of members to proposals at an early stage) with local agendas being pursued and offering a different view to the LDF Panel. There does not appear to be a corporate mechanism for achieving a consensus.
- C3: There is a good GIS system but as yet no corporate shared database or links with information in partner organisations. This could usefully be developed. There is little evidence of feedback on the web and information and data are not presented in ways that are easy to understand or accessible to a wide audience.

**D Management**

- D1: The planning policy team is a very small team. In addition to the planning policy manager, there is a team leader, one senior planning officer and two part time senior planning officers. One of the part time senior planning officers has been on maternity leave for the whole of 2009. The establishment also has an additional planning officer post but this has been vacant since he left in mid 2008. The team has therefore been 1.6 staff down for the whole of 2009 and with these posts frozen has been unable to recruit temporary or permanent replacements. There is the equivalent of

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one full time administrative post but there is no technical support so that planning officers spend much of their time doing a technician's role e.g. GIS and completion of spreadsheets, and this leaves even less capacity for professional planning work. The council is looking to make 10% cuts across all budgets for 2010/11 and there is concern that this will impact even further on the team.

- D2: In April 2009, the policy team sought to second staff from development management and made a formal request for three staff to undertake work for a 4 month period. This was not forthcoming and they had used consultants instead who have now left. The fact that the development management staff are in a separate directorate made the secondment of staff more difficult to achieve. It is not clear that corporately there is importance given to the core strategy to ensure that sufficient resources are allocated to the LDF. The team has used officers in the growth point team, established in 2007, as far as possible but with funding guaranteed only up until March 2010 this is also uncertain. There is a very small budget for the development of the evidence base which has also delayed the commissioning of studies.
- D3: As the Planning Policy Manager may retire in 2010 and there is uncertainty about local government reorganisation with the proposals for a single unitary authority for Devon, the Policy Manager has stepped aside from day to day management in order to ensure succession planning. His role is now shared with the team leader. The officer leadership of the LDF has not always been clear to those outside the team.
- D4: The management of the programme is ad-hoc with no project and resource planning and significant slippage has occurred. No resource assessment has been done. There is no detailed project plan or individual work programmes so that priorities can change without much warning and therefore without the knock on consequences being established. The current timeline is for the 'preferred options' report to go to members in early 2010. With many of the evidence studies still to be completed and their evaluation to be undertaken it is not yet clear whether the time line is deliverable.

***E Innovation, learning and managing risks***

- E1: There is a comparatively conservative management culture although it is open to and encouraging ideas to come forward. The authority is looking to make services more efficient but not yet investigating the "changing roles of places".

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- E2: Officers have used the PAS toolkit on evidence base to assess the requirements but at present very little funding is available. There would be benefit in these circumstances in taking stock of the evidence available and whether or not there is sufficient for their needs. An approach to PINS for a frontloading visit may also give some comfort.
- E3: Some of the team are reluctant to embrace new ways of working and the LDF is still being promoted in a traditional land use plan culture e.g. the terms of reference for the LDF member Panel, drafted in May 2009, identifies a key purpose of the Panel to allow members to understand the themes, issues and challenges facing the council in respect of future land use planning matters.

**F** *Shared knowledge and evidence*

- F1: The evidence base needed to support the development of a core strategy has not been discussed or agreed beyond the policy team. There is no one place for collating evidence/data within the authority although the majority is held by the policy team. Data and evidence is not being systematically shared between central services, other partner organisations and planning. Although lots of evidence is and has been gathered for the LDF, little work has yet been done to draw out clear and simple messages from different elements of it. This means that there is no shared understanding of existing problems and the implications of members' decisions on strategic allocations.
- F2: The council uses the 'Limehouse' LDF database and consultation software. This enables LDF documents and consultation to be undertaken both electronically and with paper copies, and final documents to be easily printed via a remotely hosted website.
- F3: There is no dedicated monitoring officer and information gathered by the policy team is not being used systematically to inform decision making on planning proposals. There are no joint meetings between development management and policy. The annual monitoring report is not yet being used comprehensively to pick up key messages and linkages to inform subsequent policy development and work on other strategies. It is not yet seen by all as a key document which puts the LDF at the centre of the authority and its achievement of objectives.
- F4: Consultation was undertaken on the scoping report for sustainability appraisal in 2008 though changes have not yet been made in the light of comments received. Consultants have recently been appointed to undertake the sustainability appraisal and strategic environmental assessment for the core strategy but there has been no member or

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partner involvement in the setting of objectives. Due to insufficient resources within the policy team, this is not leading to any capacity building in the team and it is not being used to inform or make effective decisions on a daily basis.

**G Decision-making**

- G1: An LDF member Panel was established in 2008 with regularly fortnightly meetings and minutes circulated to all members. There is, however, a need to ensure that backbench members are more engaged.
- G2: There is no officer working group on the LDF and no corporate mechanism for dealing with issues. The Corporate Management Team does not regularly discuss the LDF and is not yet used as a mechanism for debating issues and achieving a consensual view.

**Interviews carried out and documents used in the preparation of this report**

The authority was visited by Alison Blom-Cooper and Andy Roberts GOSW (part of the day) on the 8 October 2009. The visit included meetings with:

Cllr G Brown	Chair of the LDF member panel, Deputy Leader and Portfolio Holder for the Environment
Cllr R Franklin	Portfolio Holder Strategic Planning and Regeneration
Cllr Diviani	Chair of the Development Management Committee
Cllr Skinner	Member Champion – rural areas
Mark Williams	Chief Executive
Kate Little	Head of Planning and Countryside Services
Matt Dickins	Principal Planning Officer
Steve Belli	Development Control Manager
Peter Jeffs	Corporate Director
Gareth Bradford	Devon County Council
John Maidment	Planning Policy Manager
Linda Renshaw	Senior Planning Officer, LDF team
Frank Woolson	Senior Planning Officer LDF Team
Maria Toynton	Administrative Officer LDF Team

Telephone interviews were held with:

Karlme Hassan	Strategic Director Economy and Development Service
Fliss Morey	East of Exeter Projects Director

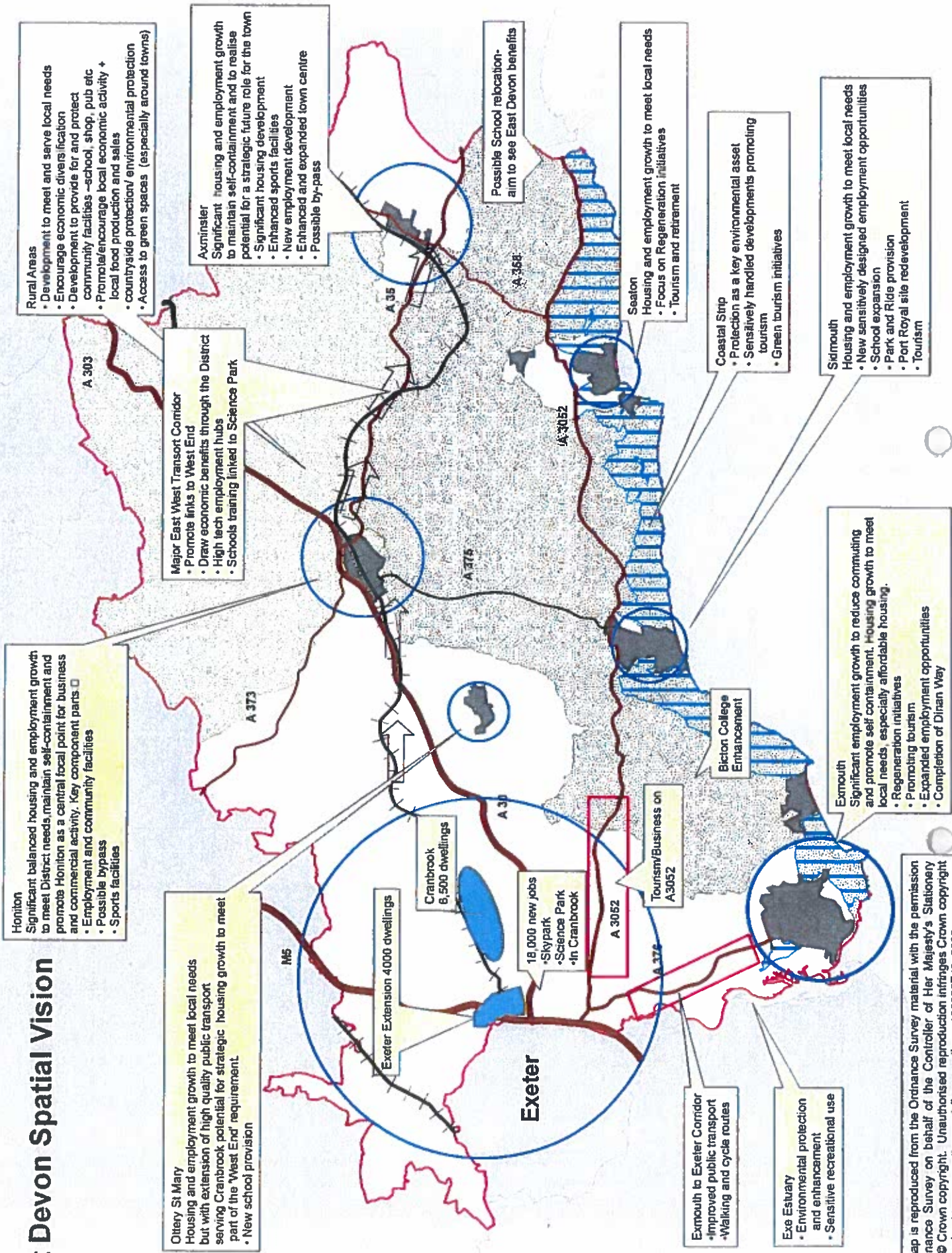
The following documents were examined:



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1. East Devon Sustainable Community Plan 2006-2016
2. Devon Local Area Agreement 2008-2011
3. East Devon District Council Corporate Strategy 2007
4. East Devon Local Development Scheme Approved March 2005
5. East Devon Revised Local Development Scheme March 2007
6. Statement of Community Involvement July 2008
7. East Devon Annual Monitoring Report December 2008
8. Draft Economy & Development Service Plan 2009-12
9. LDF Issues and Options Final Consultation Report December 2008
10. LDF Core Strategy – consultation statement and audit trail of document production: 7 April 2009
11. Issues and options questionnaire survey December 2008
12. LDF Issues and Options - All questions with bar charts and pie charts
13. University of Exeter Science Park Final Adopted SPD November 2008
14. East Devon Gypsy and Traveller Issues & Options Report April 2008
15. Organisational Chart June 2009
16. Planning and conservation monthly monitoring report August 2009
17. Timetable for Core Strategy Production to LDF Panel 24 September 2009
18. Potential studies/commissions for core strategy
19. LDF Panel terms of reference: May 2009
20. Core Strategy Issues and Options Report to Development Control Committee: 16 September 2008
21. Report to Development Management Committee: Issues & Options Response and Progress Report – 20 October 2009
22. Evidence base requirements based on PAS toolkit: 15 September 2009
23. Comments from Government Office for the South West on Core Strategy: Issues and options December 2008
24. Comments on the draft report from East Devon District Council received by email on 3 and 4 November 2009

# East Devon Spatial Vision



**Honiton**  
 Significant balanced housing and employment growth to meet District needs maintain self-containment and promote Honiton as a central focal point for business and commercial activity. Key component parts:  
 • Employment and community facilities  
 • Possible bypass  
 • Sports facilities

**Ottery St Mary**  
 Housing and employment growth to meet local needs but with extension of high quality public transport serving Cranbrook potential for strategic housing growth to meet part of the 'West End' requirement.  
 • New school provision

**Major East West Transport Corridor**  
 • Promote links to West End  
 • Draw economic benefits through the District  
 • High tech employment hubs  
 • Schools training linked to Science Park

**Rural Areas**  
 • Development to meet and serve local needs  
 • Encourage economic diversification  
 • Community to provide for and protect community facilities - school, shop, pub etc  
 • Promote/encourage local economic activity + local food production and sales  
 • countryside protection/ environmental protection  
 • Access to green spaces (especially around towns)

**Axminster**  
 Significant housing and employment growth to maintain self-containment and to realise potential for a strategic future role for the town  
 • Significant housing development  
 • Enhanced sports facilities  
 • New employment development  
 • Enhanced and expanded town centre  
 • Possible by-pass

**Exeter**  
 Exeter Extension 4000 dwellings  
 Cranbrook 6,500 dwellings  
 18,000 new jobs  
 • Skypark  
 • Science Park  
 • In Cranbrook

**Possible School relocation-**  
 aim to see East Devon benefits

**Seaton**  
 Housing and employment growth to meet local needs  
 • Focus on Regeneration Initiatives  
 • Tourism and retirement

**Coastal Strip**  
 • Protection as a key environmental asset  
 • Sensitively handled developments promoting tourism  
 • Green tourism initiatives

**Sidmouth**  
 Housing and employment growth to meet local needs  
 • New sensitively designed employment opportunities  
 • School expansion  
 • Park and Ride provision  
 • Port Royal site redevelopment  
 • Tourism

**Exmouth**  
 Significant employment growth to reduce commuting and promote self containment. Housing growth to meet local needs, especially affordable housing.  
 • Regeneration initiatives  
 • Promoting tourism  
 • Expanded employment opportunities  
 • Completion of Dihan Way

**Tourism/Business on A3052**

**Exmouth to Exeter Corridor**  
 • Improved public transport  
 • Walking and cycle routes

**Exe Estuary**  
 • Environmental protection and enhancement  
 • Sensitive recreational use

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## Housing and Planning Delivery Grant – Awarded For Performance in 2008/09

15 December 2009

In December 2010 the Government announced funding to local authorities in England through the Housing and Planning Delivery Grant (HPDG) for performance in the 1 April 2008 to 31 March 2009 financial year. The provisional grant for East Devon is £9,915.

The CLG website pages on Planning and Housing Delivery Grant can be viewed at: <http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyimplementation/planningdeliverygrant/> and this advises that:

*“The Housing and Planning Delivery Grant (HPDG) was established in 2007 to reward local authorities for improved delivery of housing and other planning outcomes as part of their strategic, place shaping role and to provide more support to communities and local councils who are actively seeking to deliver new homes. The grant replaces Planning Delivery Grant (PDG) which has been paid since 2002-03.”*

The former PDG funding was focussed to a large extent on Development Control/Management performance. The first funding of HPDG was made in respect of performance in 2007 – 2008, the funding announcement we have received (2<sup>nd</sup> year) is for 2008-2009 and the third year of the advised three year funding package applies to performance in 2009-10 (i.e. for the year ending 31 March 2010). Following the first year payments the methodology for awarding grant aiding was revised following a Communities and Local Government (CLG) consultation exercise in the summer of 2009. Despite the current pressure on public finance there is no indication on the CLG website (as at 21 January 2010) to suggest/indicate that the funding regime will be abolished for year 3 (performance in 2009/10). There is though no indication that the grant or a similar grant will be available for future years (i.e. performance from years 2010/11 onward).

The table below provides information on the East Devon grant aid in respect of performance in 2008/09.

Component Part	East Devon	Potential Maximum	Commentary on 2008 to 2009 Period	Action for Future Years
5 Year Supply of Housing Land	£0	£73,125	Five year land supply assessment is a measure of availability of land for housing development (qualified by realistic assumptions of future house building) set against strategic policy requirements – currently the Devon Structure Plan (and taking into account past completions). In East Devon the fact that the Cranbrook housing requirement is very high and development has not started has meant that assessments indicate a below 5 year figure.	An early start at Cranbrook in 2010 might provide some scope to project very high house building rates for the new town. This and other schemes in the planning pipeline (using high completions projections) could provide for a five year land supply. However the RSS (assuming it is 'adopted' as currently drafted) will place higher demands on/for the District.
Publication of SHLAA	£0	£36,562	The SHLAA assess potential development sites in the District. SHLAA production is a very time consuming exercise (it proved more complex and time consuming than initially envisaged) and it did not prove possible to complete the exercise in East Devon before the end of 31 March 2009.	The SHLAA will be completed before 31 March 2010. Resources can be directed to ensure this happens. However directing staff resources to SHLAA completion could inhibit other work being done.



Component Part	East Devon	Potential Maximum	Commentary on 2008 to 2009 Period	Action for Future Years
Involvement of Housing Market Partnership	£0	£18,281	This element of grant aiding would require completion of the SHLAA.	We have involved a partnership on SHLAA production and so could (if the funding stream is retained) be eligible in future years.
Core Strategy DPDs and Allocating > 2000 dwellings	£0	£500,000 or more	This element of grant aiding rewards adoption of plans that allocate land for 2,000 dwellings or more. In East Devon a Core Strategy or allocating DPD is not close to adoption. To have been close would have required more substantive levels work to have been done over the past 3 or 4 years.	Revised timetable and plans for Core Strategy production will be put in place but adoption of the Core Strategy will not be until 2011 or 2002 at the earliest.
County Council Minerals and Waste DPDs	£0	N/A	N/A	N/A
Joint Working on DPDs	£0	£27,000	We have not committed/undertaken work on joint DPD production.	We could re-examine the potential for formal joint plan making with Exeter for example for a Joint Area Action Plan for the west of East Devon/east of Exeter (or other partners/areas). This could secure future funding but could take some time to formally agree. Plus there are many other factors that would inform any decision.
Publication of SHMA	£9,915	£9,915	We secured full funding for this element of work for Strategic Housing Market Assessment (SHMA) work.	The SHMA will, in the years ahead, need redoing. Given changes in the house building industry in the past two years elements of the SHMA can be expected to be out of date. Resources for updating the SHMA have not been identified and it is liable to be a task requiring specialist consultant skills. Teignbridge are currently updating their part/area of the Exeter and Torbay SHMA.
Abatement of DPD element based on DC Performance	£0		No abatement (reduction).	Continue with current performance.
Housing	£0	Very High!	This element is based net new housing completions exceeding the existing stock by defined percentage figures (it demands that lots of houses are built). Grant is provided for each unit that exceeds the baseline level. Milton Keynes secured <b>£1.735M</b> from this source!	If available over future years then large development at Cranbrook and elsewhere could secure substantial funding but immediate completions will not happen.

Tabled below are provisional grant figures for (old) Devon authorities.

Component Part	East Devon	Exeter	Torbay	Treightbridge	South Hams	Mid Devon	West Devon	Torridge	North Devon	Plymouth	Devon County
5 Year Supply of Housing Land	£0	£73,125	£73,125	£0	£73,125	£73,125	£0	£73,125	£73,125	£73,125	£0
Publication of SHLAA	£0	£0	£36,562	£0	£36,562	£36,562	£0	£0	£0	£36,562	£0
Involvement of Housing Market Partnership	£0	£0	£18,281	£0	£18,281	£18,281	£0	£0	£0	£18,281	£0
Core Strategy DPDs and DPDs Allocating > 2000 dwellings	£0	£0	£0	£0	£0	£0	£0	£0	£0	£542,826	£0
County Council Minerals and Waste DPDs	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
Joint Working on DPDs	£0	£0	£0	£0	£0	£0	£0	£27,000	£27,000	£27,000	£0
Publication of SHMA	£9,915	£9,915	£9,915	£9,915	£9,915	£9,915	£9,915	£9,915	£9,915	£9,915	£0
Total Planning element	£9,915	£83,040	£137,884	£9,915	£137,884	£137,884	£9,915	£110,040	£110,040	£707,710	£0
Abatement of DPD element based on DC Performance	£0	£0	£0	£0	£0	£0	£0	£0	£0	£81,424	£0
<b>Total Planning element (after capping &amp; abatement)</b>	<b>£9,915</b>	<b>£83,040</b>	<b>£137,884</b>	<b>£9,915</b>	<b>£137,884</b>	<b>£137,884</b>	<b>£9,915</b>	<b>£110,040</b>	<b>£110,040</b>	<b>£626,286</b>	<b>£0</b>
Housing	£0	£495,508	£268,278	£0	£0	£306,394	£190,580	£255,084	£183,250	£123,144	£0
<b>Total HPDG Allocation (rounded)</b>	<b>£9,915</b>	<b>£578,548</b>	<b>£406,162</b>	<b>£9,915</b>	<b>£137,884</b>	<b>£444,278</b>	<b>£200,495</b>	<b>£365,124</b>	<b>£293,290</b>	<b>£749,430</b>	<b>£0</b>

