

Agenda for Strategic Planning Committee

Tuesday, 27 November 2018, 10am



[Members of the Strategic Planning Committee](#)

Venue: Council Chamber, Knowle, Sidmouth, EX10 8HL

[View directions](#)

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- 1 [Public speaking](#)
- 2 Minutes of the Strategic Planning Committee meeting held on 4 September 2018 (pages 4-9)
- 3 Apologies
- 4 Declarations of interest - Guidance is available online to Councillors and co-opted members on making [declarations of interest](#).
- 5 [Matters of urgency](#) – none identified
- 6 To agree any items to be dealt with after the public (including press) have been excluded. There are no items that officers recommend should be dealt with in this way.

Matters for Debate

- 7 **Future Housing Needs and Requirements in East Devon** (pages 10-26)
This report provides an overview of work, including Government policy and a recently published report from the Campaign to Protect Rural England, on future house building needs and levels.
- 8 **Housing Monitoring Report to Year Ending 31 March 2018** (pages 27-52)
This report provides a summary of house building monitoring data to the year ending 31 March 2018. The report also advises on the initial implementation of a new database that has assisted with current work and will speed up future housing monitoring work.
- 9 **Update report on progress, resource and staffing matters for the Greater Exeter Strategic Plan and also an update on the work programme for future East Devon Local Plan production** (pages 53-64)
This report provides an update of the ongoing work on the Greater Exeter Strategic Plan and the plan production timetable. The report also highlights financial and staffing resource considerations in respect of taking the plan forward and through to adoption. In addition reference is made to the work programme for a new East Devon local plan.

- 10 **S106/Community Infrastructure Levy Developer Contributions Annual Report 2017/18** (pages 65-74)
This report focuses on the financial contributions paid to East Devon District Council, the sums paid, how the financial contributions have been collected, where these have been spent and the balance of unspent monies at the end of the last financial year.
- 11 **Government Response to Consultation on Developer Contributions** (pages 75-78)
This report outlines the Government response to the public consultation on supporting housing delivery through developer contributions, which took place from March – May 2018. The opportunity is also taken within the report to update Members on the revision of the Community Infrastructure Levy Charging Schedule in East Devon.

Break

Afternoon Session – the items below will not be considered before 1.30pm.

- 12 **Heritage Strategy** (pages 79-167)
This report introduces a consultation draft of the Heritage Strategy for East Devon.
- 13 **Glover Review of Designated Landscapes - Call for Evidence Response** (pages 168-180)
This report highlights the Government's request for an independent review of England's National Parks and Areas of Outstanding Natural Beauty (AONBs). This report sets out the Council's proposed response to the call for evidence.
- 14 **Landscape Character Assessment – Draft Report and Proposed Public Consultation** (pages 181-185)
This report introduces a consultation draft of the East Devon and Blackdown Hills Landscape Character Assessment and Management Guidelines.
- 15 **Cranbrook Plan Development Plan Document** (pages 186-191)
The report provides an update on the production of the Cranbrook Plan Development Plan Document and associated timescales and also provides an update on current planning applications and development in the town.
- 16 **Community Infrastructure Levy Members Working Party Terms of Reference** (pages 192-193)
To agree the Terms of Reference for the Community Infrastructure Levy Members Working Party.

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If you are recording the meeting, you are asked to act in a reasonable manner and not disrupt the conduct of meetings for example by using intrusive lighting, flash photography or asking people to repeat statements for the benefit of the recording. You may not make an oral commentary during the meeting. The Chairman has the power to control public recording and/or reporting so it does not disrupt the meeting.

[Decision making and equalities](#)

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EAST DEVON DISTRICT COUNCIL

Minutes of a meeting of the Strategic Planning Committee held at Knowle, Sidmouth on 4 September 2018

Attendance list at end of document

The meeting started at 4.30pm and ended at 7.09pm.

***15 Public speaking**

The Chairman welcomed everyone present to the meeting.

Malcolm Randall, a building consultant living and working in Whimble, asked the committee for more flexibility in considering how it applied planning policy to larger scale developments. He felt that the area boundaries were too limiting, stressing the need for development in rural areas in order to help villages remain viable.

***16 Minutes**

The minutes of the Strategic Planning Committee meeting held on 24 July 2018 were confirmed and signed as a true record.

***17 Principles For Accommodating The Future Growth Needs Of East Devon**

The report presented to the committee outlined the future growth needs of East Devon and how they could be accommodated. The report has been informed by work undertaken for the now adopted Local Plan and some early work on the Greater Exeter Strategic Plan (GESP).

In November 2017, the government consulted on a white paper called “Planning for the right homes in the right places: consultation proposals”. One of the key proposals in the paper was a standard method for calculating local authorities housing need. The government therefore proposed a standard method, based on publically available data and reflecting the actual needs for each area. Alongside the consultation the government published a table of housing needs for each district based on the calculator. In the case of East Devon this shows a housing need of 844 homes per year, and the committee were asked to consider the 844 as an indicator of a minimum level of growth that will need to be accommodated.

On top of this is to achieve Members aspiration to deliver one job per home, so the Council will also need to deliver enough employment space to accommodate at least 844 jobs per year. In the Local Plan it was estimated that based on this ratio for each 250 new homes we would need to deliver around 1 hectare of employment land.

In considering sustainable growth, Members were referred to the sustainability appraisal (SA) that was carried out at each stage of the development of the now adopted Local Plan. This is because the themes that were considered as part of the SA remain a good bench mark to consider the factors that will be important for planning growth into the future. The themes used were as follows:

- Healthy and Prosperous Communities
- Environmental Protection and Enhancement
- Resource Consumption and Climate Change
- Economic Growth, Education and Employment

The committee were reminded that this was ongoing work, with no decision to be made at the meeting, but to encourage discussion and debate.

Discussion covered:

- Clarifying if the future plans covered building more services and infrastructure or relying on existing services for new homes in the future – in response, there would have to be an accommodation of both, depending on the application scale and local needs;
- Need to look at a wider range of housing types, such as offsite manufacture, as acceptable for planning applications;
- Recent Overview committee discussion on renewable energy of interest to the committee in providing evidence to help understand how to provide for future growth;
- Failure with current local plan to address issue of mobility in rural areas and adaptive homes requirement; it was not practical to expect the private sector to provide the requirement;
- Add to “Ensure that sites are genuinely viable and deliverable at allocation stage” (paragraph 4.2) the term “and will be delivered”. There are a number of allocations but need compulsion to deliver;
- Needs reference to the rural economy. With many small villages struggling, the small development they want will make them viable; why create new villages when many are keen to expand to survive, and will in turn lead to more jobs and improvements in infrastructure;
- Would the stated growth only help out neighbouring areas to reduce the number of homes they had to provide? The Council was working with neighbouring authorities in planning growth for the wider area, but the report presented was set out to explain what growth needs to be undertaken within the District boundaries to meet the government calculated need, not in picking up growth for other authorities;
- Disagreement with paragraph 8.10, in that it was not presenting the reality of Ottery St Mary that had both schools and medical practices at capacity with limited bus services; and that large scale developments had not delivered in providing adequate infrastructure;
- Unhappy that area to the north of Exmouth and west of Ottery St Mary was identified as area for growth;
- Need for developing a housing policy that gave young people a chance to get a home;
- Need to address issue of inadequate health provision for the growth of the district, particularly in respect of growing elderly demographic;
- Need a pragmatic and practical approach to delivery of homes;
- Look to encouraging community led development, where many can get a much higher proportion of affordable housing delivered;
- Look at splitting sites to allow a proportion to be delivered by local builders to help local economy;
- Encourage house build types that will fit with older, traditional styles of surrounding houses;
- Need for funding for infrastructure in order to support such growth;
- Should planning permission be given if there is any doubt that the development won't be delivered;
- Cannot force landowners to sell land for development;
- Focus on improving rail transport as current road infrastructure cannot support growth.

RESOLVED:

1. That the issues raised in the report be noted;
2. That the proposed principles for growth as the basis for future discussion and consultation on accommodating growth in the district be endorsed.

***18 Greater Exeter Strategic Plan – Update and Vision**

The report presented to the committee provided an update on the progress of preparing the Greater Exeter Strategic Plan (GESP) and to recommend that a public consultation on a new vision for the plan, together with engagement on homes and infrastructure matters be held in October and November 2018.

The consultation document was before the committee to consider if it met their vision for the GESP and adequately addressed the associated infrastructure needs, including previously indicated aspirations for a sports hub and concert venue.

Many Members voiced their concern on the content of the consultation document.

Discussion covered:

- Need for greater emphasis on healthcare, particularly in respect of surgeries at capacity, and travel needs of rural community to receive care;
- Sport and music opportunities welcomed. Need for entry level sports facilities where young people live; significant benefits to the community from having those opportunities;
- Prioritising immediate need for dealing with travel infrastructure before looking at sport facilities;
- Lack of reference to energy use and energy resources;
- Lack of reference to 5G technology;
- Needs more ambition in tackling transport issues, such as how to replace diesel buses with electric buses; and other radical solutions for moving people around the area;
- Force Exeter to become involved in delivery by adding in the need for a regional centre for swimming;
- Passing loop at Whimble needed;
- Consistent high quality of broadband provision needed;
- Consultation document not clear on how people should respond – tailor it to provide succinct responses that can be easily analysed;
- Not clear on how a “connected region” will be delivered;
- Doesn’t cover for how people will travel to work between towns, only focus on travelling to Exeter for work;
- No indication of forward funding.

RESOLVED:

1. that before consultation, the consultation document “Our New Vision and How We Make It Real” be amended to:
 - a. include reference to assisting the rural community;
 - b. include reference to increasing healthcare provision in response to demographic changes;
 - c. include entry level sports provision and sports hub;
 - d. include provision of passing loop at Whimble, and other transport provision;
 - e. include a review of energy needs and how to supply them;
 - f. include an indication of forward funding; and
 - g. include a clear set of questions that provide information that can be analysed.
2. That before consultation, the amended document be considered at a future meeting of the Strategic Planning Committee.

***19 Publication of the new revised National Planning Policy Framework (July 2018)**

The report presented to the committee summarised the revised National Planning Policy Framework (NPPF), which was published on the 24 July 2018, and highlights and comments on specific matters that may have particular relevance in East Devon.

The NPPF sets out the government’s planning policies for England and how these are expected to be applied. The revised NPPF does not introduce any fundamental changes to the planning system or processes but it does bring about some more detailed changes, particularly with regard to plan making. This revised Framework replaces the previous NPPF published in March 2012.

In addition to the changes to the NPPF the government has also updated the Planning Practice Guidance which is a more detailed on-line document that provides detail about the implementation of the NPPF. The guidance is regularly updated and will continue to be. The guidance has however been significantly updated already in terms of issues of viability:

- Viability assessment work will be primarily undertaken at the plan making stage;
- Justification will be required for a re-assessment of viability, strengthening the local authority’s ability to resist viability challenges other than where clear unforeseen issues arise;
- Providing clearer guidance on land values; and
- Promoting openness and transparency on viability issues, with the expectation that appraisals are publicly available other than in exceptional circumstances.

Points raised during the discussion included:

- Need for a policy of viability assessment, that includes making public that assessment;
- Need for standards on the uplift of land values; this suggestion was challenged by other Members in terms of value being dependent on location as well as grade, and should stay on a case by case basis;
- Need for clarify over how the new NPPF now affects decisions by the Development Management Committee in considering applications against the agreed Local Plan - the Local Plan takes precedence for a planning application unless a material consideration overrides it – so the new NPPF can be a material consideration alongside supporting evidence;

- Testing at appeal in weighting the new NPPF over the existing Local Plan may be only way of finding out if that approach can be adopted.

The Service Lead for Planning Strategy and Development Management reminded the committee that there was already work underway by planning officers in adapting their internal procedures to take account of the changes in the NPPF. . A report would be presented to Development Management Committee to highlight a couple of key changes and how these affect decision-making.

RESOLVED: That the content of the report be approved.

20 Statement of Community Involvement (SCI)

The Statement of Community Involvement is a document that Local Planning Authorities are required to produce, setting out how the Council will consult the local community and other interested parties on:

- Planning Policy documents (including Local Plans, 'Supplementary Planning Documents and other guidance);
- Neighbourhood Plans; and
- Planning Applications.

An SCI states who the council will consult with, when and how. It provides an opportunity to ensure that the particular needs of 'hard to reach' groups are taken into account, making the planning system more inclusive.

The committee considered the Statement of Community Involvement report updating Members of the progress made since the consultation, which ran from Tuesday 3 July to Wednesday 15 August 2018. The SCI had now been updated, taking account of the consultation.

RECOMMENDED TO COUNCIL: That the Statement of Community Involvement, subject to minor amendments as set out in table at paragraph 3.1 of the report and as updated arising from the consultation, be adopted.

***21 Interim Masterplan to support planning applications at the Exeter Science Park and the adjacent Redhayes development to facilitate a potential land use exchange**

The report presented to the committee outlined the need for an Interim Masterplan to be used to guide and inform two planning applications to ensure that, in the event of a land exchange, the new development coming forward is compatible and complementary to the Science Park and the adjacent mixed-use development at Redhayes.

Consultation of the Interim Masterplan has been undertaken by means of two workshops held with key stakeholders. Following this, amendments and clarification were made to the draft interim document to accommodate where possible the views of the stakeholders.

RESOLVED:

That the Interim Masterplan for Exeter Science Park and Redhayes Development be endorsed.

Attendance list

Committee Members:

Councillors:

Paul Diviani - Chairman

Mike Allen – Vice Chairman

Susie Bond

Matt Booth

Colin Brown

Jill Elson

Graham Godbeer

Mike Howe

Geoff Jung

Geoff Pook

Eleanor Rylance

Philip Skinner

Also present (present for all or part of the meeting):

Councillors:

Ian Thomas

Pauline Stott

Brian Bailey

Andrew Moulding

Paul Carter

Ben Ingham

Roger Giles

Helen Parr

Peter Faithfull

Officers present (present for all or part of the meeting):

Mark Williams, Chief Executive

Ed Freeman, Service Lead – Planning Strategy and Development Management

Andy Wood, East of Exeter Projects Director

Chris Rose, Development Manager

Matt Dickins, Planning Policy Manager

Tim Spurway, Planning Officer

Keith Lane, Planning Officer

Shirley Shaw, Planning Barrister

Debbie Meakin, Democratic Services Officer

Apologies:

Councillors

Mark Williamson

Ian Hall

Rob Longhurst

Alan Dent

Tom Wright

Chairman Date.....

Report to: **Strategic Planning Committee**

Date of Meeting: Tuesday 27 November 2018

Public Document: Yes

Exemption: None



Review date for release Update reviews will be provided on any future changes that impact on housing number calculations.

Agenda item: 7

Subject: **Future housing needs and requirements in East Devon**

Purpose of report: This report provides an overview of work, including Government policy and a recently published report from the Campaign to Protect Rural England, on future house building needs and levels.

Recommendation:

- 1. Members to note the motion on future housing provision in East Devon from the Council meeting of 24th October 2018.**
- 2. That an independent study be commissioned to consider the specific housing needs of all groups within the community and how these needs make up the overall housing need for the area.**
 - a. That the committee recommend to Council that a budget of up to £30,000 be set aside to meet the costs of the study.**
 - b. That a Member workshop be set up in the new year to consider the housing needs study and the overall housing need.**
- 3. Approve the proposed responses to the Government consultation on a proposed revised approach to determining housing numbers contained in Appendix 1 to this report.**

Reason for recommendation: To ensure members note current thinking on and possible future choices in respect of future housing development levels and also respond to Government consultation.

Officer: Ed Freeman, Service Lead – Strategic Planning and Development Management

Financial implications: The budget implications are mentioned within the above recommendation and should be considered against the future financial pressures as highlighted within the medium term financial plan. The funding will be taken from the New Homes Bonus grant which is in itself driven by growth within the district.

Legal implications: There are no legal implications other than as set out in the report.

Equalities impact: Low Impact
N/A

Risk:	Low Risk This report introduces debate around potential thinking and approaches to future house building levels. Being a report on assessments, rather than seeking to establish policy, means low risks are identified.
Links to background information:	<ul style="list-style-type: none"> • Links to background reports and information are included in the body of the report.
Link to Council Plan:	Provision of new housing will have links to all Council priorities.

1 Introduction

- 1.1 This report has been produced to set out commentary on potential future levels of housing provision in East Devon. The report highlights and comments on;
- Government policy for housing provision;
 - A recent housing needs report for Devon produced by consultants for the Devon branch of the Campaign to Protect Rural England (CPRE) ; and
 - Possible policy approaches to housing for the Greater Exeter Strategic Plan (GESP).

On the 24 October 2018 a motion was put to Council in respect of the potential scale of house building for East Devon, the adverse impacts that would arise and the need to consider scope to establish lower levels. It was resolved that the motion be referred to Strategic Planning Committee for further consideration. See Council minutes at: <http://eastdevon.gov.uk/media/2686683/241018x-council-mins.pdf>

This report to committee addresses matters raised in the motion as well as wider housing requirement issues.

- 1.2 It should be noted that when this committee report was in preparation, at the end of October 2018, the Government issued a consultation document on a proposed revised approach to determining housing numbers. Information drawn from the Government consultation document has been incorporated into this report and Appendix 1, at the end of this report, sets out proposed responses to the questions included in the Government consultation document. The consultation document itself can be viewed at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/751810/LHN_Consultation.pdf
- 1.3 A recently published CPRE report (produced before the Government consultation document was published) challenges a number of Government and locally generated assumptions and conclusions around housing need. The report was produced for the CPRE by a well respect consultancy firm, a spin-out company of Swansea University, called Opinion Research Services (ORS). They are a company that has been employed by this and partner authorities in recent years. Unfortunately the CPRE report has not (yet) been published on-line and is only available to purchase by mail order. A copy purchased by the Council can be made available to Members on request.

- 1.4 There is also a second CPRE document, produced for them by Dr Philip Bratby, called – A Review of Government Housing Policy and its Impacts on Devon. This second report covers some similar ground to the main report and is only briefly commented on in this report. It also is only currently available in paper format to purchase by mail order but can also be made available to Members on request.

2 What generates the need for additional housing?

- 2.1 The size and make-up of a population in any given area will change over time and this will impact on the number of people and families (the households) that need homes. In respect of changes in the population, over time, there are four key factors that are taken into account in demographic modelling;
- a) The number of births in an area;
 - b) The number of deaths in an area;
 - c) The number of people moving into an area;
 - d) The number of people moving out of an area.

These are looked at in the context of the age of people involved other than births.

- 2.2 In East Devon (and across Devon taken as a whole) there are more deaths each year than there are births and this factor, taken alone, would lead to a declining population. However, there are more people moving into East Devon, and Devon as a whole, than there are people moving out and the impact of net in-migration offsets the fact that death rates are higher than birth rates. The overall picture is one of a year-on-year population increase.
- 2.3 Modelling of projected future in-migration and out-migration takes past trends and patterns, and projects these forward. Rates of population increase fluctuate over time and in and out migration levels and their application in predicting future population levels is an issue that is hotly debated and disputed amongst experts in the field of demography. Projected future birth rates and death rates generate less debate and difference of opinion.
- 2.4 Through understanding the size, age and make-up of the population and the projected change in the population it is possible to make predictions about how many new households there will be in the future and from this how many homes will be needed. Household numbers can be compared against the existing housing stock to calculate whether there are sufficient homes to house the population or additional new homes are required. The demographic assessment process includes looking at such issues as how household composition (especially size) has changed over the years and how things may change in the future, as well as considerations that impact on the 'available' housing stock such as the numbers of holiday homes and vacant properties. Translating population levels into household and housing numbers is, however, also an area where significant differences of opinion exists amongst experts.
- 2.5 Taking all of the demographic factors into account shows, however, a need for additional new home building in East Devon; though it will be of no surprise to note that differing people undertaking assessment will and do come to different conclusions on the numbers.

- 2.6 Over and above (just) the demographic considerations there are other factors that can be taken into account in establishing appropriate levels of house building to meet need, these include:
- a) **Aspirations for job and business growth** – if an area has aspirations for increased job growth it may be that the existing population is not large enough, or lacks relevant skills, to provide the resident workforce to fill jobs. A result may be a need or a policy choice to provide extra housing to accommodate in-migration of extra people to fill the jobs;
 - b) **Affordability of housing** – if homes are expensive in an area, and especially if wage levels are low, it can be very challenging for many people (impossible for some) to buy a home. One response to this challenge can be to encourage more new home building and therefore increasing supply. Conventional economic theory would have it that the price of a commodity is determined by its supply and the demand for it – if supply goes up but demand does not change then the price should come down;
 - c) **Securing more affordable housing** – most new affordable housing is secured as an element (a percentage) of overall market housing developments. If there is an aspiration to secure more affordable housing then one approach is to secure more house building in general; and
 - d) **Meeting needs generated from elsewhere** – if an area cannot meet or provide for its own housing needs then it may be appropriate for another area to meet these needs. A refinement of this approach would be not so much around capacity and ability to meet needs in a given area (say a particular local authority) but to adopt an approach based around where best to accommodate and distribute collective housing needs across a number of areas (for example across a number of local authorities).
- 2.7 With respect to point d) above, there may exceptionally be circumstances, around ability or capacity to accommodate growth, which could justify not meeting housing needs and further on in this report additional commentary is supplied.
- 2.8 It should be noted that housing numbers in the adopted East Devon local plan used demographic trend data as a starting point to determine an appropriate level of housing, but then increased this provision in order to ensure that there was a workforce of sufficient size to meet job growth expectations. Local Plan work estimated an increase of 549 net new jobs per year in the District and to ensure that there would be sufficient employees to meet this projected growth generated a need for 950 new homes per year. However, determining the appropriate number of new homes for East Devon and ensuring that we had a local plan in place that met the requirements of Government policy and that was considered sound by the Planning Inspector was a drawn-out and challenging process.

3. Government policy for housing provision

- 3.1 Under the old National Planning Policy Framework (NPPF – 2012) the requirement was for planning authorities to follow a logical, but not explicitly defined process, to establish appropriate levels of future housing development.
- 3.2 One of the changes in the new NPPF (2018), see paragraph 60, is the introduction of a national methodology for establishing house building levels at local authority level. The national methodology uses nationally defined household projections generated for local authority areas as a starting point, however, it also adds in an additional element based on the affordability of housing in the local authority area. This affordability is calculated through comparing house prices to income levels and is called an affordability ratio.
- 3.3 In September 2018 the consultancy firm of Lichfields published assessment, using the Government methodology, of up-to-date housing requirements generated from the latest available information, see:
https://lichfields.uk/media/4510/lichfields_the_2016_based_household_projections.pdf
It is stressed that this is understood to be Lichfields assessment, not the Government's work – but it is assumed that Lichfields would advise that they have followed the Government methodology and therefore had the Government done the work they would have come up with the same conclusions. It should be noted that in the CPRE report, as referred to later on in this report, the same numbers are also quoted.
- 3.4 In this report we refer to 2017 based assessment and to 2018 based assessment. We use these dates as they are the points in time that assessments were undertaken. However by way of further background information the 2017 assessment was undertaken using 2014-based population projections and the 2018 assessment was made using 2016-based household projections. In the consultation documents these base date projection figures are used in questions asked, it is, therefore, relevant to point out these technical considerations, however this report does not seek to explain the complexities of how the projection assessment work is undertaken.
- 3.5 Annual housing requirement numbers, from September 2018, as specified in the Lichfields report for East Devon and bordering local authorities, are tabled below:

Local authority	Annual housing requirement – new homes per year
East Devon	953
Exeter City	629
Mid Devon	306
Teignbridge	815
Taunton Deane	641
South Somerset	630
West Dorset	495

- 3.6 In the case of East Devon the 953 figure falls very close to the 950 annual average housing figure in the currently adopted local plan. Tabled below are the household projection figures for East Devon generated using the Government methodology, with relevant background statistical information from 2017, this data is compared against the relevant data for the

2018 assessment along with the comparative percentage uplift figure for each year applied taking into account affordability ratios (these numbers are reported on in the CPRE report).

	Household projections total	Workplace affordability ratio	Affordability uplift	Annual housing need
2017 – East Devon Figures	630	9.45	34%	844
2018 – East Devon Figures	698	9.84	37%	953

- 3.7 In this report to committee the housing numbers that have been published have been reproduced but no attempt has been made to replicate the assessment work undertaken to generate the numbers (or alternatives) nor has source data been interrogated (to do so would require some time and specialist skills). It is notable that the household projection total jumps quite significantly in East Devon from 630 homes in the 2017 based assessment to 698 homes in the 2018 based assessment. Teignbridge was the only other Devon local authority to see an increase (up from 551 to 573) with all other Devon authorities seeing a decline (see CPRE report Figures 31 and 32). The CPRE report sets out a Devon wide total that falls from 4,034 in the 2017 assessment to 3,620 in the 2018 assessment.
- 3.8 The affordability ratio and % uplift, the multiplier, applied to the base household projection number increases marginally in East Devon across the 2017 to 2018 data, in some other Devon authority areas this figure also goes up and in some it goes down. It is highlighted that there is no apparent statistical or financial assessment behind the uplift percentages to indicate the potential scale or amount of financial impact that they may have on house prices if or when implemented. They would appear to be numbers that are used to create an uplift in housing requirements but not to be numbers that have a clearly explained or articulated logic behind them.

Government consultation on amending local housing needs assessment

- 3.9 Whilst the housing need requirements for East Devon rose from 2017 to 2018 assessment this was not a pattern replicated across England as a whole. For most local authority areas the need assessment numbers fell and for England as a whole they fell from 269,000 homes per year to 213,000 per year, see paragraph 10 of the consultation document. This, it can probably be assumed, is not an outcome that the Government would have wanted as they clearly identify a need for more house building and not less. In the consultation document, see paragraph 7, the Government refer to delivery of 300,000 homes per year, on average, by the mid-2020s. In paragraph 4 of the consultation document they advise that last year 217,000 homes were built.
- 3.10 One of the complexities involved in modelling the needs for future housing requirements is the issue of translating future population numbers into future household numbers. Over past decades the average size of households has fallen. In simple terms if population levels were to stay the same, but household sizes fall, there will be less people per home and therefore there would be a need for extra homes. This falling average household size was one of the factors that has led to more house building through much of the 20th century

and into the 21st century. In the CPRE report – A review of Government Housing Policy and its Impacts on Devon (see paragraph 2.10) it is reported, however, that the pattern of declining household size “*stopped shrinking in about 2003 and has started to increase*”. If you apply an increasing household size to a situation of a population level that is not changing you would, notionally at least, end up with surplus homes.

- 3.11 Any debate on the subject of increases in average household size could generate wide ranging questions, but key amongst these would be whether the change is:
- a product of individual choices and perhaps changing attitudes and values in society leading toward more people choosing to live together? or
 - whether it is a result of, or more closely related to, availability (and by implication affordability) of housing?

- 3.12 In the Government consultation document, paragraph 11, sub-paragraph 1, there can be little doubt around the Government view on this issue, they advise:

“Household projections are constrained by housing supply. If new, additional homes are not supplied, then households cannot form as there would be nowhere for them to live. This means that actual household growth cannot exceed the number of additional homes which are actually supplied.”

Further on in the consultation document, see paragraph 13, in quoting an Office for National Statistics statement, the consultation document advises in respect to recent trends in household size data:

“They do not take account of how many people may want to form new households, but for whatever reason aren’t able to, such as young adults wanting to move out of their parents’ house, or people wanting to live on their own instead of in a house share. Therefore, household projections are not a measure of how many houses would need to be built to meet housing demand; they show what would happen if past trends in actual household formation continue.”

- 3.13 In order to overcome an England wide picture of the most recent, 2018 based, work generating a housing needs outcome that falls below the 2017 generated level (and also below Government aspirations for 300,000 per year being built) the Government are proposing in their consultation document that for the short term the 2017 rather than the 2018 need outputs are used. In the longer term they identify a need for a revision of the methodology to calculate local housing needs.

Application of Government Policy

- 3.14 The clear expectation in Government policy is that planning authorities should plan for the number generated, as a minimum, though noting that choices can be made for exceeding numbers. We are not aware of any authority that has sought to legally challenge the validity of this approach to establishing minimum levels and it not clear if or on what grounds such a challenge may be made. It has, however, been reported that there has been a more broad ranging legal challenge to the NPPF and its introduction. This challenge is being pursued by Friends of the Earth and relates to issues of legality of plans or programmes being

introduced in the absence of strategic environmental assessment (as required under EU law). The key issue at stake would appear to be whether the NPPF has the legal status of a 'plan or programme' and therefore the requirement applies.

- 3.15 Aside from legal considerations nor are we aware of any authority that has pursued a policy approach that does not apply the Government methodology on housing numbers and in doing so seeks to argue a case that in policy terms the Government approach is flawed or inappropriate or that they have a more appropriate approach. In their consultation document, at paragraph 15, the Government do advise, however, that:

"The standard method for assessing minimum housing need was designed to identify an appropriate level of need in a straightforward, transparent way. It does not represent a mandatory target for local authorities to plan for, but the starting point for the planning process. Local planning authorities may decide that exceptional circumstances justify the use of an alternative method, but they will need to identify these reasons and can expect them to be tested by the Planning Inspectorate during the examination of their plans."

The CPRE argue in their document that the Government approach is flawed. Though it is questionable what weight, if any, a Planning Inspector may apply to the CPRE argument and thinking (as set out in their report).

- 3.16 Notwithstanding the above observations, under the NPPF, it is possible to seek to argue a case that lower housing levels should be built than those generated by the standard methodology on account of special circumstances that constrain capacity or the ability to accommodate new homes. This is a different position to one of arguing that the Government methodology is flawed or inappropriate given local circumstances. To justify a case of capacity constraint preventing planning for housing would require demonstration of exceptional circumstances. Despite the significant environmental constraints in East Devon it would be envisaged that it would be very challenging to establish coherent and justified grounds to not meet identified needs (perhaps unless these increase very significantly in the future from previous levels). It is suggested that an argument for not meeting housing needs, and under-providing, based (just) on it being unpopular with residents would be likely to carry very little weight with a planning inspector.

- 3.17 Whilst providing less than the need figure would appear very challenging it is relevant to note that Paragraph 60 of the NPPF advises that:

"In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."

- 3.18 In the context of neighbouring areas the NPPF does not state that neighbouring areas explicitly means neighbouring local authorities but this would seem a reasonable starting point (and quite possibly finishing point) to consider cross-boundary need and capacity considerations.

- 3.19 It is also important to note that meeting housing needs is not just about delivering the overall number of new homes needed but meeting the specific needs of all groups in society whether they be specific types of housing to meet the needs of different age groups or people with specific circumstances. Meeting these needs could lead to requirements for specific housing types and tenures but this is vital if the housing needs of the district are to be met. In order to understand these needs further work is needed to establish the nature and extent of the specific housing needs of different groups in the district.
- 3.20 The issue of diversifying the homes being delivered to better meet the diverse range of housing needs found in most communities has been identified by the review recently undertaken by Oliver Letwin MP in the context of increasing housing delivery rates. The full findings of the review can be found at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752124/Letwin_review_web_version.pdf
- 3.21 Once all of the evidence of housing need has been collected and collated it would be appropriate to have a wider debate with Members on the issues of housing need and how we go about meeting the identified housing needs of the district.

4 The CPRE Housing Report

- 4.1 The recently published CPRE report challenges a number of Government and locally generated assumptions and conclusions around housing need.
- 4.2 It should be noted that the main CPRE report covers the whole of what is sometimes termed as 'old-Devon' – this includes the whole of the administrative area of Devon County Council (including constituent District, City and Borough Council areas and Dartmoor National Park and part of Exmoor National Park) as well as the unitary authority areas of Plymouth and Torbay. Whilst some information and examples are highlighted in the report at the lower tier authority levels, including for East Devon, the report is geared around presenting an overall Devon wide picture.
- 4.3 The CPRE report covers a range of housing matters (including matters such as affordable housing need and provision) as well as background demographic information, it contains some interesting statistical assessment and wider policy related observations. However, the commentary below is centred on matters that are raised in the report and that are specifically relevant to overall housing numbers.
- 4.4 The CPRE report is critical of the statistical logic behind the Government approach to calculating housing numbers and amongst other matters they challenge the absence of use of local figures and locally based assessment (paragraph 1.12). Based on their assessment of Government population projections the CPRE report (page 6, first bullet point) advises that 4,300 new homes per year should be built in Devon over the next ten years. This figure is some way lower than the 5,800 homes per year that they identify as predicted by the various local plans. The CPRE report considers that existing local plans are already planning for too much housing. Their 4,300 figure is, however, higher than the

4,034 and 3,620 per year levels that are generated in the demographic (only) projection using the Government methodology (assessments dated 2017 and 2018). The CPRE 4,300 per year figure does not include an affordability uplift and they do not consider applying an uplift to be appropriate or justified.

- 4.5 The CPRE report, at paragraph 4.10, looks at housing costs and changes in prices over time. Data is presented to show that house prices (purchase and renting), relative to local earnings, were lower in 2016 than they were in 2007, at the peak of the market. In contrast, Figure 24 in the CPRE report indicates that on average, across England, the ratio of earnings to house prices was the same (or at most minimally different) in 2007 as it was in 2016.
- 4.6 In support of their case the CPRE report stresses what they see as the importance attached to comparative affordability change (comparative lowering of prices) within the context of Government thinking. They indicate that the Government see this as a critical consideration in respect of establishing overall housing numbers. At paragraph 4.12 the CPRE report advises:

“In standardising the approach to assessing housing need, the Government places considerable weight on the ratio between house prices and earnings – so it is an indicator that has a significant influence when determining the planned level of future housing supply.”

- 4.7 The CPRE report argues a case that as comparative affordability in Devon has reduced over the 2007 to 2016 period the ‘affordability’ uplifts in the Government methodology (the size/scale) are not justified. Figure 24, a graph in the CPRE report, also shows, however, that in 2002 house prices relative to earnings were much lower than they were in either 2007 or 2016. Unfortunately data in the report does not go back further than 2002. We know that the gap between house prices and earnings is increasing and therefore if we are to address this and make housing more affordable logically we should increase supply.

5 Greater Exeter Strategic Plan

- 5.1 As members will be aware the GESP is in production and it covers the local planning authority areas of
- East Devon District Council;
 - Exeter City Council;
 - Mid Devon District Council; and
 - Teignbridge District Council.
- Devon County Council, although not a planning authority in respect of the GESP, are a key partner in GESP production with a particular interest and responsibility in infrastructure and transport matters.
- 5.2 GESP will cover a number of strategic planning issues across the four planning authority areas. The intention is that it will set out housing development numbers through to 2040, and potentially beyond, along with policy for employment land and more generally policies

promoting major facilities and supporting infrastructure. It is planned, as well, that it will identify and allocate strategic/large scale sites for future development.

- 5.3 One option for GESP would be to plan to meet the entirety of the, or a, local authorities housing needs in that local/planning authority area. Part of the work on GESP will be, however, to best determine how to accommodate and distribute the collective housing needs of the four GESP authorities across the GESP area. A key part of the logic for producing GESP is that the task of distributing development is most effectively and efficiently undertaken, in line with producing the best strategic outcomes, through a coordinated cross-authority plan. Under such an approach the need figures for an individual authority may be of limited importance. What is important is the total collective sum of new homes needed for all the authorities and then an agreed approach to distribution of those homes.
- 5.4 A slight complication, however, is that Dartmoor National Park covers a part of Teignbridge District and a very small part of Mid Devon District (as well as parts of South Hams and West Devon). Dartmoor National Park authority is a planning authority in its own right but the Government methodology does not generate housing numbers for National Parks. Dialogue will need to take place, in respect of housing numbers and distribution, between the National Park Authority and the constituent District/Borough Councils.
- 5.5 Despite the whole Greater Exeter area approach to housing numbers being adopted through GESP there is no suggestion at this stage of the work on GESP that the number of homes to be accommodated in East Devon per annum would be markedly different from current levels.

6 Conclusions

- 6.1 This report has sought to provide an overview of debate and work on potential future housing numbers and distribution. Whilst critical commentary is included, specifically in respect of the position of Government and the CPRE, this report, by intent, does not seek to explicitly challenge numerical assessments that have been undertaken. Even without challenging numerical assessment it is possible, however, to provide a number of concluding observations.

The potential to not apply the Government housing assessment

- 6.2 It is noted that the CPRE report advises on what they regard as the appropriate level of housing provision for Devon, the scale of housing that should be planned for. Notwithstanding potential policy in GESP for the distribution of housing there would, however, be fundamental concerns around seeking to use CPRE housing numbers as opposed to those generated from the Government methodology. The Government figures are underpinned by Government policy and the NPPF sets out, in clear terms, that they should be used in plan making. Regardless of sympathy, or otherwise, with the lower CPRE figures it seems very unlikely that they would find favour with a Planning inspector at appeal or through planning policy document examination. As something of an aside the CPRE work does not provide a breakdown of what they see as appropriate numbers for

each local authority. There are significant differences between allocated numbers in local plans and the figures generated by the government methodology in areas of Devon such as Plymouth where allocations are more than double the currently identified need. The difference between these figures in other areas in Devon are what largely lead to CPRE's conclusions that numbers are too high across Devon as a whole.

Lack of detailed assessment behind the CPRE numbers

- 6.3. In arriving at their suggested housing numbers for Devon the CPRE work is not based on original demographic modelling work. Their consultants have not using demographic modelling tools to make projections of future population levels and likely housing needs. If there were dissatisfaction with Government projections of population and household change there are various tools that exist that allow for bespoke modelling. For example for the East Devon Local Plan the council employed consultants, Edge Analytics, to use a model called PopGroup to undertake detailed modelling of future population change to generate data on potential future housing needs. Any local detailed assessment of future housing needs might be expected to be backed up by bespoke modelling work.

Seeking to make housing more affordable and other potential policy objectives

- 6.4. The CPRE work recognises that houses prices are significantly greater than wage levels, in their work they advise of a house price to earnings ratio of 8.4 in 2016. Regardless of this being noted in their report as being lower than the position in 2007 it is still a very high gap. Mortgage companies might reasonably lend up to or around (but not much more) than 3.5 times a households income when it comes to lending against house buying. For those on lower incomes, or even for many on what are good incomes, buying a house can still prove to be challenging or impossible. In their report (paragraph 6.7) the CPRE advise:

“it seems unlikely that building more houses would lead to an overall reduction in house prices”.

Unless it was shown that an increase in house prices was matched (and counteracted) by an increase in demand for housing (and/or other factors are at play that actually are the determinant of house prices) this statement appears to fly in the face of conventional economic thinking. Conventional thinking would have it that if more houses are built, availability goes up, prices should fall – but by how much is another matter.

- 6.5 The CPRE work also fails to explore other potential policy objectives that may come about from building more homes or which may generate the need for more house building, including need that may be generated from an economic growth agenda or seeking to secure more affordable housing.

Is possible over provision of housing a problem?

- 6.6 The CPRE challenge the need to plan for more house building. If they are correct in their assertion that the need does not exist it becomes questionable whether the extra houses will actually be built. In a market economy house builders can be expected to carefully monitor and assess what is being sold and house building firms would seek to manage

what they build in the light of what they predict they can sell. It seems unlikely that houses will be built unless there is confidence that they will sell so it may be that over-allocating sites for housebuilding, so long as allocations are in intrinsically good and appropriate locations, is not necessarily a problem. If they are not built the sites will remain undeveloped (and often will remain in productive uses such as for farming) and if they are built they will be appropriately sited for new housing.

Appendix 1 – Proposed response to the questions in the government consultation document:

Technical consultation on updates to national planning policy and guidance - October 2018 - Ministry of Housing, Communities and Local Government

This appendix forms a proposed response to the questions posed in the Government consultation document. It should be noted that some of the questions relate directly to the subject matters highlighted in the committee report whilst others not so much. Explanatory commentary is provided by way of background information in respect of a number of the questions. It should also be noted that some of the questions asked are in respect of matters of some detail and complexity, to gain a full picture the consultation document really does need to be reviewed and in so doing there would also be a need to review wording in the NPPF and planning practice guidance.

Question 1 – in the consultation documents relates to the issue of whether previous rather than the most up to date household projections data is appropriate for use.

Q1: Do you agree that planning practice guidance should be amended to specify that 2014-based projections will provide the demographic baseline for the standard method for a time limited period?

Proposed Response by East Devon District Council:

We would highlight that what is critical is that any housing needs figure generated is done so through a process of logical assessment and evaluation and can be justified by robust evidence. There would appear to be real concerns over the robustness of outputs of one or other (or perhaps both) of the 2014 based and the 2016-based assessments given that they produce such varying conclusions. We would also express concerns around the robustness and more importantly the justification that underlies the affordability uplift calculation that also features in the standard methodology. We would accept that there is a need to uplift numbers to address affordable housing needs but the basis for the current uplift calculator is unclear.

Question 2 – relates to whether there is any justification for the use of 2016-based projections, i.e. the needs figures that were generated in 2018, being used as a justification to plan for less housing. East Devon is an unusual case of a local authority that saw an increase in calculated housing need from the 2017 generated needs to the 2018 generated needs. Most authorities saw a fall in housing needs.

Q2: Do you agree with the proposed approach to not allowing 2016-based household projections to be used as a reason to justify lower housing need?

Proposed Response by East Devon District Council:

We would reiterate that the critical issue in any needs assessment is that any housing needs figure generated is done so through a process of logical assessment and evaluation and can be justified by robust evidence. Where an authority can demonstrate that 2016-based assessment, or other assessment, is appropriate under their circumstances it would appear reasonable for the alternatives to be used. However this must be done so in the context of the need for a full appreciation of the logic, reasoning and thinking that underpins wider Government policy for housebuilding.

Question 3 – under the standard methodology for calculating housing needs there is a cap placed on the amount by which the affordability uplift can increase the total housing numbers. This cap applies in situations such as where a local authority (or more specifically a group of local authorities) produce a new plan that provides for a certain level of housing growth but future Government needs assessment then generates a much higher need figure. A cap can be applied where the increase would be unreasonably high.

The Government are consulting on a specific issue around the application of the cap in respect of spatial development strategies, higher level plans produced by a number of partner authorities – GESP would be an example – and the issue around whether the cap is applicable to individual authority needs or collective needs. The Government consider that applying a single figure across all of the authorities, rather than individual ones, would make the calculation simpler.

Q3: Do you agree with the proposed approach to applying the cap to spatial development strategies?

Proposed Response by East Devon District Council:

We would support measures, in principle, to make assessment work simpler. On the face of it this proposal would appear to achieve that but there may be cases where applying the cap in this way leads to outcomes that are not appropriate given local circumstances. It would therefore be appropriate to establish this approach as the norm but leave flexibility in exceptional local circumstances. It would help, as well, if planning practice guidance was made far clearer in respect of the workings and application of the cap. Regardless of the suggested amendment the current wording lacks clarity.

Question 4 – this question relates to the issue of whether it should only be local plan housing numbers that should be used in five year land supply assessment or whether flexibility should also exist (in the absence of plan policy) to be able to use the standard methodology approach in respect of determining applications or appeals. The Government accept that for five year land supply assessment, where policy does not follow the national methodology for quantifying housing need and so long as policy is up to date, it is appropriate to use policy numbers in the assessment.

The qualified changes the Government propose would, however, prevent authorities undertaking a bespoke assessment of housing need, divorced from plan policy numbers (or where policies are up to date), that sought to justify overall housing need figures that varied from those generated by the standard methodology for use in a five year land supply assessment.

Q4: Do you agree with the proposed clarifications to footnote 37 and the glossary definition of local housing need?

Proposed Response by East Devon District Council:

In principle having up to date plan policies specifying housing need levels is appropriate and will be the correct base position to typically apply in five year land supply assessments. The changes proposed would, however, appear to remove any flexibility for bespoke assessment of need in the absence of up to date plan policy. It would rarely be the case that bespoke local assessment is appropriate, and as such the standard national approach for determining needs, should typically be relied upon. However the changes as suggested would appear to go too far as there may be exceptional cases where nationally generated figures generate perverse levels or numbers, perhaps unreasonably high, and which on sound planning or other grounds could be reasonably challenged. There should be some flexibility in wording to recognise this potential outcome and allow for some local bespoke work, in the absence of adopted up to date planning policy, to establish appropriate local need.

Question 5 – this question relates to the definition in the NPPF, in the glossary of Annex 2, of what constitutes deliverable, it is advised in the consultation document that there was some ambiguity of interpretation of wording as previously drafted. In the consultation document the Government advise of amendment of wording to read:

“Deliverable: *To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

- a) *sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) *where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”*

Q5: Do you agree with the proposed clarification to the glossary definition of deliverable?

Proposed Response by East Devon District Council:

We would express concerns in the first sentence to the use of the words/phrases “*available now*” and “*suitable location for development now*”. Sometimes sites may not be available or suitable for development now but can confidently be predicted to be in this position in a short period of time, perhaps a year or two. It might be that planned or under-construction infrastructure works (or other considerations) would render the site available in the near future and at a point at which housing delivery could then safely be expected to occur - perhaps in two or three years time.

The qualifying paragraph a) would appear reasonable though we would have concerns about the potential onus of proof on a local authority to demonstrate clear evidence that housing completions will begin in five years as required under paragraph b). Land owners or developers may not share information or pass comment on when they may choose to build so it may be that a local authority simply cannot provide clear evidence. Of significant importance as well are “*will begin*” in the last sentence. The onus should rest on the sites being available for development and therefore it would be better to use the words “*could begin*”. Local planning authorities should not be dependent upon the whims or vagaries of what land owners or developers want to do over development timelines.

Question 6 – this question relates to the Habitat Regulations and is not therefore about housing numbers. The government, nonetheless, decided to include it in the consultation paper. The Habitat Regulations, written to comply with European Law, afford protection to the most important designated wildlife sites of which there are a number in East Devon but of most significance in terms of impacts on planning are the Exe Estuary and the Pebblebed Heaths. Under the Habitat Regulations any proposal that could have adverse impacts on the designated sites needs to be the subject of a formal assessment, if this assessment finds potential for adverse impacts it may necessitate the need for mitigation measures to enable the proposal to go ahead.

A recent legal case, ruling of the European Court of Justice on case C323/17 (People over Wind, Peter Sweetman v Coillte Teoranta), has resulted in a change to when and how assessment under the Habitat Regulations needs to take place. The legislative positions surrounding this case is complicated, but the enthusiast may wish to read articles such as that linked below:

<https://insideecology.com/2018/05/01/habitat-regulations-assessments-no-more-screening-out-with-mitigation-measures/>

In very simplified terms initial assessment work looking at potential adverse impacts (a process called appropriate assessment) which needs to be undertaken at the start of creating a project, such as when initially preparing a planning application, should not take into account any planned mitigation measures to address possible adverse impacts. Rather, if there is the potential for adverse impacts (regardless of whether mitigation measures are embedded in a project at the outset) a detailed assessment under the Habitat Regulations needs to be undertaken. In the light of this, in the current NPPF wording and in respect of the presumption in favour of sustainable development, there is inaccuracy in respect of not making it clear that appropriate assessment may be necessary. The Government propose to amend paragraph 177 of the NPPF wording to read:

“The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that there will be no adverse effect from the plan or project on the integrity of the habitats site.”

Q6: Do you agree with the proposed amendment to paragraph 177 of the National Planning Policy Framework?

Proposed Response by East Devon District Council:

Support is given to amendments that provide clarity and accuracy in respect of legal matters.

Report to: **Strategic Planning Committee**

Date of Meeting: Tuesday 27 November 2018

Public Document: Yes

Exemption: None



Review date for release Further reviews will be published in 2019.

Agenda item: 8

Subject: **Housing Monitoring Report to Year Ending 31 March 2018**

Purpose of report: This report provides a summary of house building monitoring data to the year ending 31 March 2018. Looking forward, the report establishes that in East Devon we have a greater than five year land supply and the report also advises on the initial implementation of a new database that has assisted with current work and will speed up future housing monitoring work.

Recommendation: **That committee note the residential completion data and future projections in the District.**

Reason for recommendation: To keep members informed of:
1. Work on land supply to the year ending 31 March 2018; and
2. Improvements to housing monitoring systems.

Officer: James Coles, jcoles@eastdevon.gov.uk – 01395 571745

Financial implications: No specific financial implications

Legal implications: There is a legal requirement for the Council to monitor housing completions and demonstrate an ongoing 'Five Year Land Supply' of sites for housing. This reports ensures that the Council is complying with its duties and can demonstrate an adequate supply of housing. Other legal implications are covered in the report.

Equalities impact: Low Impact
Low direct impacts are identified in respect of this report.

Risk: Low Risk
The report itself does not generate direct risk considerations. Should, however, housing completion levels fall in the future then there could be risks associated with a failing five year land supply and/or inability, in a more general sense, to meet housing needs and house the population.

Links to background information:

- [Schedule of Sites in the Housing Monitoring Update for the Year Ending 31 March 2018](#)
- Further information on Council monitoring can be found at: <https://eastdevon.gov.uk/planning/planning-policy/policy-work-whats-new/monitoring>

Link to Council Plan: The council priorities that this report and housing monitoring most directly link to are encouraging communities to be outstanding and continuously improving to be an outstanding council.

1 Introduction

- 1.1 Through the planning policy team the Council produce an annual housing monitoring report (the latest Housing Monitoring Update is appended). This report to Committee forms the annual monitoring report for the year ending 31 March 2018. Ideally the monitoring report would be produced much sooner after the March end date of the monitoring year. Strata, on behalf of the Council, have been building a new database to greatly speed up and enhance the monitoring process which, has only recently reached a useable state.

2 Housing Need and Housing Supply in East Devon

- 2.1 The East Devon Local Plan, specifically in respect of housing supply and monitoring purposes, covers the 18 years running from 1 April 2013 to 31 March 2031 (it is though relevant to note that the plan will be superseded by new plans before this end date). For this 18 year period the plan establishes an objectively assessed need for 17,100 new homes to be built in East Devon. This averages out at 950 homes a year.
- 2.2 The table below shows the net number of homes that have been recorded as built in the five years running from 2013 to 2018.

Table of housing completions for 2013/14 to 2017/18

Year	2013 to 2014	2014 to 2015	2015 to 2016	2016 to 2017	2017 to 2018	Five year total	Annual Average
Totals	830	1,029	1,027	724	866	4,476	895

- 2.3 The table illustrates that the number of housing completions in East Devon increased in 2017/18 when compared to the previous monitoring period but were lower than in both 2014/15 to 2015/16. With an annual average level of completions of 895.2, the actual supply is currently falling below annual average projected needs.
- 2.4 However, the total of 866 completions actually exceeded the 2017/18 projection of 814, and numbers are also predicted to rise for 2018/19 onward. The table below this paragraph shows site availability to support the projected housing building levels for 2018/19 through to 2030/31.

Table of projected housing completions for 2018/19 to 2030/31

Year	2018 - 2019	2019 - 2020	2020 - 2021	2021 - 2022	2022 - 2023	2023 - 2024	2024 - 2025	2025 - 2026	2026 - 2027	2027 - 2028	2028 - 2029	2029 - 2030	2030 - 2031
Totals	1,101	1,001	1,005	1,219	1,700	1,285	1,566	1,207	1,113	967	824	709	475
	6,026 ←					Projected five year housing delivery for 2018/19 to 2022/23							

2.5 The future rise in projected completions, as illustrated in the table above, is partly a product of new sites, especially large scale strategic sites (including the Cranbrook expansion areas), starting to deliver significant housing numbers, but it also reflects, more generally, site availability. It should be noted that future projected housing completion figures are primarily based on the potential expectation of sites to deliver housing in accordance with the methodology set out for the Housing and Employment Land Availability Assessment (HELAA). Though also, for a number of sites, projected levels of building reflect more detailed local assessment and understanding of predicted future housing delivery. The HELAA process, which forms an assessment undertaken in conjunction with the development industry, includes a methodology for defining the levels of development that might be expected on sites, on a year-by-year basis, dependent on the size of the site and also:

- whether a site has extant permissions;
- is already seeing development occurring; or
- whether it is otherwise identified or allocated for development.

3 Five Year Land Supply Assessment

3.1 A key reason for keeping a careful record of housing completions and the ability to deliver houses in the future is to ensure that the ability exists to maintain future land supply to match needs and expectations for housing delivery. The Council is required to assess five year housing land supply; this is an assessment of whether the projected levels of future house building, taking into account what has been built in the past, is sufficient to meet the levels of housing expected by or through the local plan for the next five years.

3.2 The equations tabled below, with associate explanation, establish the calculated housing land supply in East Devon at a base position of 1 April 2018.

Table of Housing Five Year Land Supply Assessment

Ref	Stage of Work	Numbers	Commentary (with formulas used in calculation)
A	Local Plan Requirement from 2013 to 2031	17,100	This is the objectively assessed need for housing as set out in the local plan
B	Annual Requirement	950	This is the annual average number of houses that need to be built in order to meet local plan requirements (Number = A / 18)
C	Five Year Requirement	4,750	This is the number of houses that should be built over every five year period (Number = B x 5)
D	Requirement to have been delivered by 31 March 2018	4,750	This is the number of houses that should have been built in the five years from 1 April 2013 (local plan start date) to 31 March 2018 (Number = B x 5)
E	Completions 1 April 2013 - 31 March 2018	4,476	This is the actual dwellings recorded as being built from 1 April 2013 (local plan start date) to 31 March 2018 (see table earlier in this report for this number)
F	Shortfall	274	This is the level of shortfall between what should have been built and what actually was built (Number = D - E)
G	5 Year target (excluding buffer)	5,024	This is a forward looking assessment that takes into account a standard five year requirement (i.e. it provides for the five years looking forward) and adds to it the shortfall figure (Number = C + F)
H	5 Year Target (including 5% buffer)	5,275	Government guidance requires that the Council not only provide a calculated need figure but that they also add a 5% buffer to this number (whilst it is not applicable to East Devon, the 5% buffer increases to 10% where the local planning authority wishes to demonstrate a five year supply through an annual position statement / recently adopted plan, and 20% in cases of persistent under delivery) (Number = G + 5% of G)
I	Annual Target	1,055	The 5 year target is divided by 5 to create an annual average target (Number = H / 5)
J	Total Deliverable Supply from 1 April 2018 to 31 March 2023	6,026	To understand if we are projected to meet the five year need we look to the projected supply of housing over the period from 1 April 2018 to 31 March 2023 (see table earlier in this report for this number)
K	Surplus Supply	751	By knowing the projected supply and comparing this against the 5 year requirement we can calculate if there is a shortfall or a surplus (Number = J - H)
L	Years of Land Supply With a 5% Buffer	5.71	The final calculation records the supply of housing in terms of meeting/exceeding five year needs (Number = J / I)

- 3.3 The above assessment shows that we retain, in East Devon, a five year housing land supply.

4 Housing Monitoring Database

- 4.1 The assessment work that underpins this report has utilised a new database that has been built for the Council, and specifically the Planning Policy team, by Strata. Housing monitoring work, in the past, has drawn heavily on a range of records and systems held and used by the Council. The work has, however, mostly entailed opening up these systems and specifically standalone records on computer screens and extracting or copying data from them into a standalone spreadsheet to build up a record of what has been built and what is projected to be built. The exercise was very time consuming.
- 4.2 Strata have, however, worked on a new system (a database) that directly interrogates other systems and records held by the council to ease and assist in the monitoring work. Whilst the system is not fully automated, and it is highly questionable whether it could be or, indeed, if this would be desirable, the new system saves a considerable amount of officer time and should provide more reliable outputs with information recorded, managed and reported on in a more consistent manner.
- 4.3 The new database should allow for a monitoring report to be undertaken for the year ending 31 March 2019 in the summer of 2019. Moving forward, it should provide scope for considerably more assessment of sites and schemes going through the planning process to development and occupation of homes, including data on affordable homes.

5 The Housing Delivery Test

- 5.1 In addition to a five year land supply assessment, the Government is also in the process of introducing an annual Housing Delivery Test. The test is a measurement of net homes delivered against the number of homes required over a rolling three year period. The number of net homes delivered is calculated using the new Housing Flows Reconciliation, which requires data on the number of new builds, conversions, changes of use, mobile dwellings, temporary dwellings, demolitions and other losses/gains. Information on student and other communal accommodation is also required.
- The Housing Delivery Test Measurement Rule Book can be viewed at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728523/HDT_Measurement_Rule_Book.pdf
- 5.2 Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under delivery and identify actions to increase delivery in future years.
- 5.3 Where under delivery is recorded and, when using the Housing Delivery Test results published in November 2018, it is indicated that delivery was below 25% of housing required over the previous three years, action will be required to improve delivery with a presumption in favour of development if/where house building falls below need levels.

- More information on the Planning Policy consequences of not meeting the Housing Delivery Test are set out in the revised National Planning Policy Framework, which can be viewed at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf

5.4 The Housing Delivery Test will apply from the day following the publication of the Housing Delivery Test results in November 2018. Until we receive the results from the government we do not know for sure how we are considered to have performed but our own assessment suggests that we may fall just short of the 95% of housing requirement for the last 3 years. The consequence of this would be the requirement to prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years. In many respects preparing an action plan would seem like good practice and something officers were considering doing anyway. It is likely that many local authorities will be in a similar position.

6 Jobs and Employment Land Monitoring

6.1 It should be noted that this monitoring report is specifically concerned with housing delivery monitoring. The Local Plan sets out monitoring requirements for a range of considerations and these specifically include employment land development. A full Employment Monitoring Update report to the year ending 31 March 2018 is currently being produced. As part of the employment monitoring work we will also seek to gather information and data on employment and job levels in the district.

Planning policy

Housing Monitoring Update

Up to 31 March 2018



November 2018

East Devon – an outstanding place

Contact details

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1 Introduction

- 1.1 This document provides a housing monitoring update for East Devon District Council to a base date of **31 March 2018**. The report considers the following:
- Housing completions over a 12 month period (1 April 2017 – 31 March 2018) including:
 - Total completions district wide (including by parish),
 - Breakdown of completions on brownfield and greenfield sites, and
 - Breakdown of completions of affordable housing;
 - Housing projections and housing trajectory for the plan period;
 - Five year land supply calculations for the period 1 April 2018 to 31 March 2023.
- 1.2 Section 113 of the Localism Act (2011) removed the requirement of Councils to submit an Annual Monitoring Report (AMR) to the Secretary of State, but allowed monitoring reports to be produced covering individual indicators which must be published at least once a year. This housing monitoring update complies with that requirement.
- 1.3 The National Planning Policy Framework (NPPF) requires Councils to be able to demonstrate a five year supply of land for housing plus either a 5%, 10% or 20% buffer requirement depending on such factors as demonstrating a supply through an annual position statement or recently adopted plan, or past performance. Paragraph 73 of the NPPF states that local planning authorities should:

“include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or*
- b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or*
- c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.” (From November 2018, this will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement).*

1.4 In addition to this, paragraph 11 of the NPPF states:

“Plans and decisions should apply a presumption in favour of sustainable development.

*For **plan-making** this means that:*

- a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

*For **decision-taking** this means:*

- c) approving development proposals that accord with an up-to-date development plan without delay; or*
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date*, granting permission unless:*
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

**This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.*

Transitional arrangements for the Housing Delivery Test

Delivery of housing which was substantially below the housing requirement means where the Housing Delivery Test results published in:

- a) November 2018 indicate that delivery was below 25% of housing required over the previous three years;*

b) November 2019 indicate that delivery was below 45% of housing required over the previous three years;

c) November 2020 and in subsequent years indicate that delivery was below 75% of housing required over the previous three years.

- 1.5 This report considers the extent to which extant permissions, sites with a resolution to grant permission or acknowledged development potential, proposed allocations and future windfalls contribute towards meeting the five year requirement.

2 Completions

How do we know if a house has been completed?

- 2.1 Housing completions are monitored throughout the year using the Housing Monitoring database (which uses the Microsoft Access platform), which is linked to the main EDDC Uniform database.
- 2.2 When the Basic Land and Property Unit (BLPU) state of any given dwelling's Unique Property Reference Number (UPRN) changes (to BLPU State 2 – 'In Use' and a Primary Classification of 'Residential') within Uniform (i.e. a property is Council Tax banded), this will feed through to the appropriate planning record on the Housing Monitoring database.

How is a "dwelling" defined?

- 2.3 For the purposes of housing monitoring, generally, a dwelling is defined as being a separately Council Tax banded property. As an example, this would mean that if a house that had previously been a single Council Tax banded dwelling were to be split into four flats, each being separately Council Tax banded, then there would be an assumed three net new dwellings on the site upon completion.
- 2.4 The above definition means that annexes are not counted as a dwelling unless they become separately Council Tax banded. By becoming Council Tax banded, the annexe is recognised as a self-contained dwelling. Despite the fact that it may still be tied conditionally to be used ancillary to the main dwelling, it is serving the purpose of a self-contained dwelling and therefore should still be counted as such for the purposes of monitoring.
- 2.5 In addition to this, the Housing and Economic Land Availability Assessment (HELAA) methodology for the Exeter Housing Market Area (HMA) 2016 states that care and extra-care homes should contribute towards dwelling numbers despite units not being separately Council Tax banded. The reasoning for this is that as elderly people move into care / extra-care homes they "free up" open market dwellings for others to move into.
- 2.6 The methodology conservatively assumes that one dwelling is freed up by every two nursing or care home beds created. This is based on primary research conducted within the HMA whereby existing care homes were contacted to find out numbers of residents, the proportion that were permanent and the proportion that had previously lived alone. This research suggested that on average 50% of residents were permanent and had previously lived alone which suggests that when they permanently moved to the care home they were leaving an empty house.

n.b. New care/nursing home places in the October 2013-March 2014 monitoring period assumed 1.4:1 as a ratio, whilst from April 2014 to September 2014 1.67:1 was the assumed ratio. The Government's new Housing Delivery Test uses a ratio of 1.8:1.

Total completions

- 2.7 A full schedule of completions and projections with planning permission by site from the start of the local plan period can be found in the appendix to this report. As shown in the table below, over the 12 month period 1 April 2017 to 31 March 2018, a total of 866 dwellings have been completed in East Devon. This includes 326 at the district's "West End" and 540 in the Rest of East Devon.

	Apr 2013 – Sept 2013	Oct 2013 – Mar 2014	Apr 2014 – Sept 2014	Oct 2014 – Mar 2015	April 2015 – Sept 2015	Oct 2015 – Mar 2016	Apr 2016 – Mar 2017	Apr 2017 – Mar 2018
West End	184	302	225	306	223	180	335	326
Rest of East Devon	202	142	235	263	289	335	389	540
East Devon TOTAL	386	444	460	569	512	515	724	866
Annual TOTAL	830		1,029		1,027		724	866

- 2.8 The number of completions in 2017/18 is significantly less than what was achieved in 2014/15 and 2015/16 but far more than the 724 dwellings built in the previous monitoring period (2016/17).
- 2.9 Sixty-two per cent of the dwellings built were in the Rest of East Devon (i.e. not in the West End), which is the largest RoED share of new builds out of the five monitoring periods going back to 2013/14.
- 2.10 But with Cranbrook expansion sites at Bluehayes, Treasbeare, Cobdens and Grange expected to see completions over the next few years, it is anticipated the share of new builds in the West End compared to the Rest of East Devon will become greater again.

Completions by parish

- 2.11 The table below shows completions during the 2017/18 monitoring period by parish. Town councils are highlighted in yellow.

Parish	Total
All Saints	2
Awliscombe	0
Axminster	65
Axmouth	1
Aylesbeare	4

Beer	0
Bicton	0
Brampford Speke	0
Branscombe	2
Broadclyst	81
Broadhembury	5
Buckerell	0
Budleigh Salterton	8
Chardstock	1
Clyst Honiton	1
Clyst Hydon	0
Clyst St George	28
Clyst St Mary	0
Colaton Raleigh	2
Colyton	4
Combe Raleigh	1
Combpyne / Rousdon	1
Cotleigh	1
Cranbrook	248
Dalwood	0
Dunkeswell	4
East Budleigh	1
Exmouth	59
Farringdon	0
Feniton	4
Gittisham	0
Hawkchurch	2
Honiton	23
Huxham	1
Kilminster	4
Luppitt	0
Lympstone	4
Membury	0
Monkton	0
Musbury	1
Newton Poppleford and Harpford	11
Northleigh	0
Offwell	1
Otterton	0
Ottery St Mary	121
Payhembury	3
Plymtree	1

Poltimore	4
Rewe	0
Rockbeare	9
Seaton	54
Sheldon	0
Shute	0
Sidmouth	19
Southleigh	1
Sowton	29
Stockland	0
Stoke Canon	1
Talaton	1
Uplyme	5
Upottery	0
Upton Pyne	3
West Hill	28
Whimble	4
Widworthy	0
Woodbury	9
Yarcombe	4

866

Greenfield / brownfield split

- 2.12 The table below shows the breakdown of completions between greenfield and brownfield sites during the 2017/18 monitoring period. Greenfield describes any site on land which has not previously been developed. Brownfield therefore describes sites of previously developed land, the definition of which can be found within the glossary of the NPPF but is reproduced below for ease of reference:

“Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.”

		Dwgs	%
Greenfield	General	637	74%
	Agricultural / Forestry Building Conversion	20	2%
	Garden Sites	40	5%
	TOTAL	697	81%
Brownfield	Redevelopment	107	12%
	Conversions / COUs	62	7%
	TOTAL	169	19%
	GRAND TOTAL	866	100%

- 2.13 The table above shows that 81% of completions in the district during the 2017/18 monitoring period were on greenfield sites, which is 3% less than at the last full HMU report check covering April 2016-September 2016.

Affordable completions

- 2.14 The table below shows the number of affordable homes completed across East Devon over the last year. Affordable homes are those completed as “affordable rented”, “social rented”, “shared ownership”, “intermediate” or “other affordable”.

RoED	67
West End	53
Total	120

- 2.15 The Housing Monitoring database records a total of 120 affordable homes completed during the 2017/18 monitoring period. However, the Housing Needs and Strategy team report a total of 233 affordable units having being delivered during the same period; this difference of 113 can be accounted for by a combination of dwellings being built in the final quarter of 2017/18 but not actually being Council Tax banded until 2018/19 (and, therefore, being pulled into the database) and the Council buying properties from the open market using Right To Buy receipts and HRA funding (i.e. the properties were not originally built as affordable).

3 Projections

- 3.1 This section is an assessment of projected completions for the remainder of the plan period. The adopted Local Plan runs from 2013 to 2031.
- 3.2 Projections are broken down into:
- Extant permissions
 - These are sites that already have planning permission (either in full or outline and including sites that are already under construction) and are expected to be built out;
 - Future windfalls
 - These are an allowance for completions on windfall sites that do not yet have permission, based on historic windfall completions;
 - Acknowledged development potential
 - These are sites which either have gained a resolution to grant planning permission subject to a S106 being signed, or sites which are known to be available and which are policy compliant but which do not yet have planning permission;
 - Allocations
 - These are sites allocated by the adopted East Devon Local Plan or Neighbourhood Plans which do not yet have planning permission, these include the Cranbrook expansion zones.
- 3.3 Projections are based on the status of sites and extant planning permissions at 01 April 2018 unless pertinent additional information has arisen since that date to aid understanding of delivery (e.g. commencement information).
- 3.4 Projected build out rates for sites generally follow the approach advocated by the Exeter Housing Market Area (HMA) Housing and Economic Land Availability Assessment (HELAA) methodology market conditions model, unless we are aware of an alternative build out rate:

Size of site (no. of dwellings)	Commencement of sites			Build out rate	
	Sites where dwellings are under construction	Sites where dwellings have planning permission	Suitable sites without planning permission	Years 1-5	Years 6+
1-15 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 1	Commence in Year 3	1st year - 12 dwellings maximum 2nd year onward - 25 dwellings per year maximum	1st year - 25 dwellings maximum 2nd year onward - 50 dwellings per year maximum
16-500 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 2	Commence in Year 3	1st year - 12 dwellings maximum 2nd year onward - 25 dwellings per year maximum	1st year - 25 dwellings maximum 2nd year onward - 50 dwellings per year maximum
501-1,000 dwellings (assumes two developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1st year - 12 dwellings maximum 2nd year onward - 50 dwellings per year maximum	1st year - 25 dwellings maximum 2nd year onward - 100 dwellings per year maximum
1001+ dwellings (assumes three developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1st year - 12 dwellings maximum 2nd year onward - 75 dwellings per year	1st year - 25 dwellings maximum 2nd year onward - 150 dwellings per year

Sites with acknowledged development potential

- 3.5 Sites with acknowledged development potential are sites that did not have planning permission at 31 March 2018, however, they are expected to gain permission in the future. These are mainly sites that at 31 March had been to Development Management Committee and gained a resolution to grant permission subject to signing a Section 106 Agreement, however there are also sites that are known to be available for development and which are considered to be in principle policy compliant.
- 3.6 These sites are: Webster's Garage, Axminster (25 dwgs with zero expected to be delivered in the 5YLS period of 2018-2023) and The Fountain Head, Branscombe (10 dwgs with zero expected to be delivered in the 5YLS period of 2018-2023). Since the last check, sites previously with acknowledged development potential at Withycombe Brook, Plumb Park and Exebank & Danby House (all Exmouth) have gained permissions.

Allocations

- 3.7 The list below shows the allocations in the rest of East Devon which have not yet gained planning permission or a resolution to grant permission: Land North and East of Axminster (650 dwgs with 181 expected to be delivered in the 5YLS period of 2018-2023); Winslade Park, Clyst St Mary (150 dwgs with 125 expected to be delivered in the 5YLS period of 2018-2023); Port Royal, Sidmouth (30 dwgs with 30 expected to be delivered in the 5YLS period of 2018-2023); Lympstone Nurseries (6 dwgs with zero expected to be delivered in the 5YLS period of 2018-2023); Goodmores Farm, Exmouth (350 dwgs with 62 expected to be delivered in the 5YLS of 2018-2023).
- 3.8 The list below shows the allocations at the West End – the Cranbrook expansion zones – that have not yet gained planning permission or a resolution to grant permission and their projected build out rate: Bluehayes (975 dwgs with zero expected to be delivered in the

5YLS period of 2018-2023); Treasbeare (910 dwgs with 262 expected to be delivered in the 5YLS period of 2018-2023); Cobdens (1,490 dwgs with 225 expected to be delivered in the 5YLS period of 2018-2023); Grange (780 dwgs with 62 expected to be delivered in the 5YLS period of 2018-2023).

Overall projections and trajectory

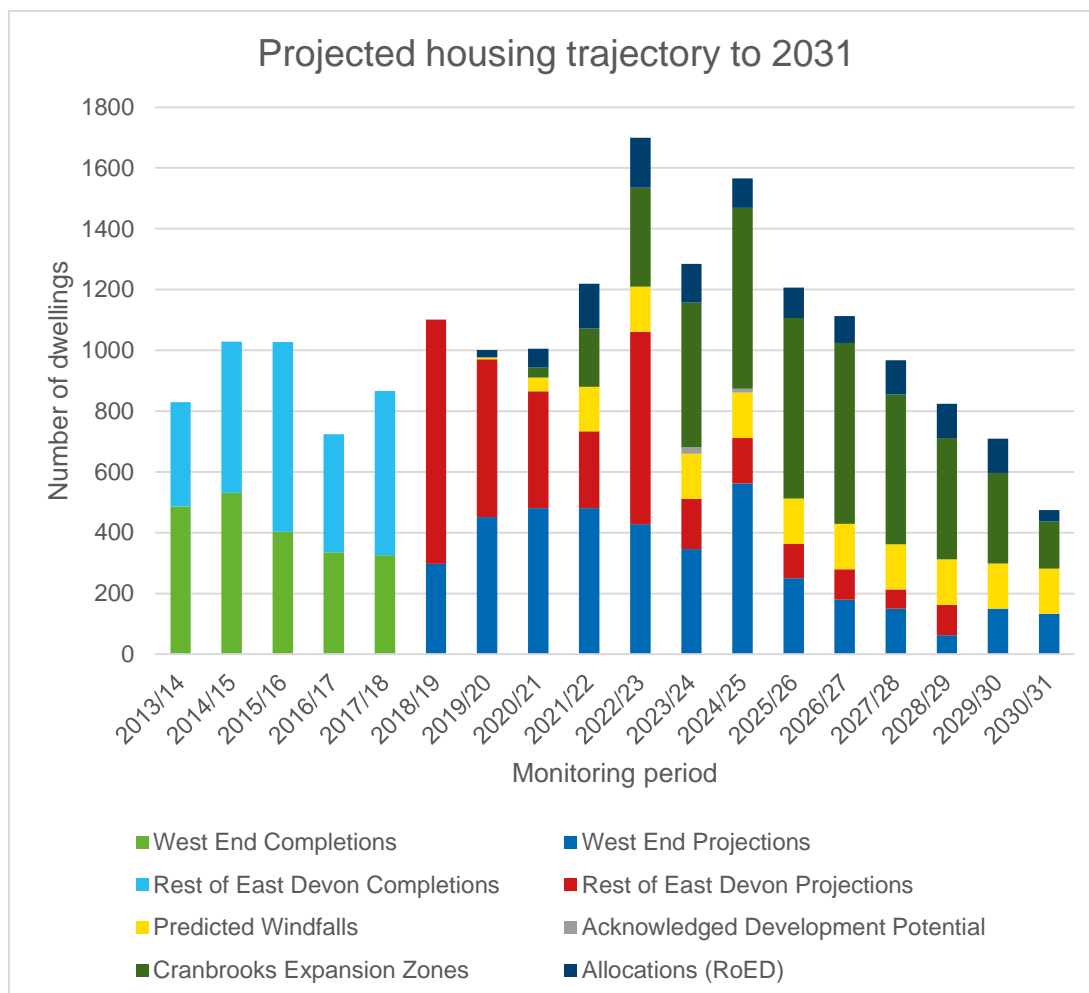
- 3.9 Having gone through the various elements of supply above, the tables below set out the projected development for the plan period to 31 March 2031.

Tables of projected housing completions for 2018/19 to 2030/31

Year	2018 to 2019	2019 to 2020	2020 to 2021	2021 to 2022	2022 to 2023	2023 to 2024	2024 to 2025	2025 to 2026	2026 to 2027	2027 to 2028	2028 to 2029	2029 to 2030	2030 to 2031
Totals	1,101	1,001	1,005	1,219	1,700	1,285	1,566	1,207	1,113	967	824	709	475
	6,026 ←					Projected five year housing delivery for 2018/19 to 2022/23							

Year	Extant permissions	Predicted windfalls	Acknowledged development potential	Allocations (Rest of East Devon)	Cranbrook expansion zones	Total projections
2018/19	1,101	0	0	0	0	1,101
2019/20	971	6	0	24	0	1,001
2020/21	865	46	0	62	32	1,005
2021/22	734	146	0	147	192	1,219
2022/23	1,061	149	0	165	325	1,700
2023/24	511	149	22	128	475	1,285
2024/25	712	149	13	97	595	1,566
2025/26	363	149	0	100	595	1,207
2026/27	280	149	0	89	595	1,113
2027/28	213	149	0	112	493	967
2028/29	163	149	0	112	400	824
2029/30	150	149	0	112	298	709
2030/31	133	149	0	38	155	475
	7,257	1,539	35	1,186	4,155	14,172

3.10 The graph below shows the breakdown of different sites making up the housing trajectory projected to 2031:



3.11 It should be noted that projected completions are based on an assessment of available sites and a HELAA panel/developer assessment of what can and is available to build on. Whether house builders choose to build at these levels will be informed by market demand and commercial attractiveness to build.

4 Five Year Land Supply Calculations

- 4.1 Paragraph 73 of the NPPF requires Councils to *“identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:*
- a) 5% to ensure choice and competition in the market for land; or*
 - b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or*
 - c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.”*
- 4.2 The point of demonstrating a five year land supply is to ensure that there is enough housing coming forward to meet requirements. On top of this, the current Government is seeking to increase housing delivery in the immediate future by requiring Councils to demonstrate a minimum of 5% extra provision but in places where delivery has been persistently below requirements 20% extra. There is no adopted Government guidance on how or when to apply which percentage buffer or what constitutes “persistent under delivery”, which is left to local authorities to determine. The Council has in recent years applied the 20% buffer as a conservative approach, recognising that there was under delivery in the years prior to the current plan period. However, it is now reasonable for the Council to say that it is clearly delivering at around or above requirements and so the 5% buffer should apply.
- 4.3 The NPPF explains that to be considered deliverable in the context of the requirement to demonstrate a five year land supply, *“sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”*
- 4.4 The adopted Local Plan has a housing requirement of 17,100 new homes for the 2013-2031 plan period, equivalent to an average of 950 dwellings per annum.

Five year land supply calculations

	Calculation	RoED	West End	Combined	Item
A		6,537	10,563	17,100	Requirement (from Strategy 1 of the adopted Local Plan 2013-31)
B	A/18	363	587	950	Annual basic requirement for each of the 18 years covered by the Local Plan
C	Bx5	1,816	2,934	4,750	Basic five year requirement
D	<i>as above</i>	<i>as above</i>	<i>as above</i>	<i>as above</i>	Requirement to have been delivered by 31 March 2018
E		2,395	2,081	4,476	Completions from 01 April 2013 to 31 March 2018
F	D-E	579	-853	-274	Difference between shortfall and surplus
G	C+F	1,237	3,787	5,024	Five year requirement (excluding 5% buffer)
H	Gx1.05	1,299	3,976	5,275	Five year target (including 5% buffer)
I	H/5	260	795	1,055	Annual target (assuming 5% buffer)
Supply element at 31 March 2018 expected to deliver 01 April 2018 - 31 March 2023					
J		2,593	2,139	4,732	Extant permissions (including under construction)
K		0	0	0	Sites with resolution to grant permission or acknowledged development potential
L		398	549	947	Strategic allocations (including Cranbrook expansion sites x 4)
M		347	0	347	Future windfalls (as per predicted calculation of April 2016)
N	J+K+L+M	3,338	2,688	6,026	Total deliverable supply
O	H-N	2,040	-1,288	751	Surplus / Deficit (assuming 5% buffer)
P	N/I	12.85	3.38	5.71	Years of land supply (assuming 5% buffer)

- 4.5 Row P in the above assessment shows that taking into account all deliverable sites across the district as a whole, the Council is able to demonstrate 5.71 years of land supply. This has decreased by 0.42 years since the last check (there were 6.13 years as of September 2016).
- 4.6 According to the above calculation, there is a surplus (number of dwellings above the required supply for the next five years) of 751 dwellings (row O) which is a significant buffer (in addition to the 5% buffer) capable of allowing for non-implementation or reduced build out rates of a number of sites if necessary. This averages out at just over 150 dwellings per year surplus over the five year period.
- 4.7 The calculation also demonstrates the impact that West End sites have on the Five Year Land Supply. Clearly, due to the scale of development at the West End, a lower than five year supply (3.38) has a big impact on the overall combined supply for the district as a whole (the Rest of East Devon has a supply of 12.85 years when the West End is excluded).

5 Appendix

The attached appendix lists all sites currently on the Housing Monitoring database where there have been completions and/or where there are projections during the Local Plan period of 2013-2031. Completions are listed together with projections broken down into forthcoming monitoring periods for the remainder of the Local Plan.

Report to: **Strategic Planning Committee**

Date of Meeting: Tuesday 27 November 2018

Public Document: Yes

Exemption: None



Review date for release This is an update and resources report on the Greater Exeter Strategic Plan, further reports on this plan will come to committee in the coming months and years.

Agenda item: 9

Subject: **Update report on progress, resource and staffing matters for the Greater Exeter Strategic Plan and also an update on the work programme for future East Devon Local Plan production.**

Purpose of report: This report updates committee of ongoing work on the Greater Exeter Strategic Plan and the plan production timetable. The report also highlights financial and staffing resource considerations in respect of taking the plan forward and through to adoption. In addition reference is made to the work programme for a new East Devon local plan.

Recommendation: **The Strategic Planning Committee is recommended to:**

- 1. Note the future work programme for Greater Exeter Strategic Plan production.**
- 2. Note the proposed work plan for new East Devon Local Plan production in the light of Greater Exeter Strategic Plan timetables.**
- 3. Endorses that a joint budget be established for the 2019/2020 financial year of £150,000 to fund the continued preparation of the necessary evidence base for the plan on the basis of an equal split of £30,000 per district/city/county Council level authority.**
- 4. Endorses the principle of retention of the two additional members of staff to provide sufficient capacity in the Planning Policy Team to continue to work on the Greater Exeter Strategic Plan and backfilling within the planning policy team (non-GESP) to provide coverage for the seconded officer to GESP. In so doing this will avoid delays in production of a new Local Plan and planned Development Plan Documents (DPD's) and Supplementary Planning Documents (SPD's) and other planning policy work.**

The Strategic Planning Committee recommends to Cabinet:

- 1. To include the sum of £30,000 in the draft budget for 2019/20 as this Council's contribution to the joint budget**

and to include a sum of £74,800 in the draft budgets for 2019/2020 and 2020/21 each year for staffing costs. Of the total budget requested of £179,600 over the two years, £97,000 will be met from reserves leaving a net additional sum requested of £82,600 required in 2020/21.

Reason for recommendation:	To gain endorsement for the future work programme and to ensure financial and staffing resources from East Devon District Council are available to contribute to plan production.
Officer:	Ed Freeman, Service Lead – Strategic Planning and Development Management
Financial implications:	The funding implications are mentioned within the above recommendation and should be considered against the financial pressures the council is expected to experience in the financial year 20/21 as highlighted within the medium term financial plan.
Legal implications:	Co-operation and joint working is promoted by the NPPF. Economies of scale in commissioning evidence in support of plan policies together with the requirement to keep local plan policies under review are all met by the approach as set out in this report. There are no legal implications other than as set out in the report.
Equalities impact:	Low Impact Low Impact
Risk:	Low Risk As endorsement is sought for continuation of current work there is a low identified risk associated with this report.
Links to background information:	<ul style="list-style-type: none"> • Links to background reports and information are included in the body of the report.
Link to Council Plan:	The Greater Exeter Strategic Plan has links to all Council priorities.

1. Introduction

1.1 Members will be aware that the following authorities:

- East Devon District Council;
- Exeter City Council;
- Mid Devon District Council;
- Teignbridge District Council; and
- Devon County Council

working in partnership are producing the Greater Exeter Strategic Plan (GESP). GESP will be a strategic plan, it will address higher level, bigger and more significant and cross-boundary planning matters across the areas of planning jurisdiction of the three District Council's and Exeter City. Devon County Council are a partner in plan production but are not a planning authority in respect of policy matters that GESP will address.

- 2.1 GESP will include planning policies of relevance across the whole of East Devon, but there will need to be further policy coverage in the District. A new East Devon Local Plan is to be produced and there will be future policy documents, Neighbourhood Plans and other guidance documents to inform the implementation of policy.

2 Logic and reasons for producing the GESP

- 2.1 It is worth highlighting some of the key considerations and reasons that lie behind the production of GESP. In being a strategic higher level plan GESP will be able to take a view over a wider geographical area than just a single local authority. This wider geographic perspective is very important as the way people live their lives and where they work and play, how business functions, transport systems work and how any number of other factors and issues operate do not align with local Government boundaries. By working and thinking across a larger geographical area it becomes possible to plan in a far more collective and holistic manner that recognises the interactions that exist across differing areas and locations whilst taking into account the differing characteristics of different areas, their strengths and weakness and the potential they offer.
- 2.2 Government policy increasingly encourages joint working across local authority areas and joint plans are increasingly common. On a local level Plymouth, South Hams and West Devon are close to completing a joint plan, West Dorset and Weymouth & Portland have an adopted joint local plan, and are producing a new one, whilst Torridge and North Devon are on the verge of adopting a joint plan. More widely many large urban conurbations are producing joint plans, relatively close by these include Bristol and surrounding authorities, and an interesting example of joint plan making can be found in Norwich where the city, which is very similar in size to Exeter, is partnering with neighbouring rural authorities (not dissimilar to those in the GESP area) and Norfolk County Council on production of a joint plan. The city of Oxford (a city not too much bigger than Exeter) and surrounding Districts are another example where joint plan making is proceeding.
- 2.3 Government funding and grant aiding is increasingly going to those authorities that are working on joint plans, especially where they are proposing or need to accommodate higher levels of growth. Such funding can form one of the key means to secure future infrastructure provision. Furthermore should the GESP Council's wish to promote more innovative and interventionist approaches to delivery of planning policy proposals then there should be far more potential and leverage by having a joint plan and going through joint plan making processes than each authorities doing their own plan.
- 2.4 On the financial side there is also scope to save money through joint plan making as it can provide for economies of scale when it comes to commissioning evidence reports and studies as well as plan writing, undertaking consultation and plan examination. A joint plan, with the joint team in place as currently exists, also provides a greater collective pool of knowledge and skills to draw on and the ability for specific officers and members to develop specialist skills in technically complex matters that can then support policy work and be shared across a number of separate authorities.
- 2.5 Notwithstanding the clear positives associated with GESP production it is relevant to highlight possible negative considerations. Of key relevance is the fact that GESP will

require the buy-in and sign-off from four separate planning authorities. These four authorities may have some differing priorities and concerns and be working to differing time scales. For GESP to make sense it will need to be a plan that each of the four authorities can clearly see the resulting collective benefits that will be delivered whilst also having relevant and appropriate benefits for their own area. However, there could be the need to accept that there may be some details that would not necessarily be the first choice of an authority but that overall greater gains will outweigh possible smaller local compromises.

3 Work to date and past consultation on the GESP

- 3.1 In July 2016 the five local authorities jointly committed to production of the GESP and officers from the Councils commenced work on evidence production and allied tasks. This early work led to production of an Issues consultation report, highlighting some of the key issues and considerations relevant to the GESP area, and possible policy approaches for the plan. The Issues report was consulted on from 27 February 2017 to 10 April 2017. Further information can be found on the GESP website at:
<https://www.gesp.org.uk/consultations/issues/>
- 3.2 In Spring 2017, following approval by the five partner Council's, a team, drawing on staff from each Council, was formed to work on production of GESP. Two officers were appointed to this team from East Devon District Council, one a secondment from an existing post and the other a new post, both, at present, are two year contracts that expire on 16 April 2019. The joint GESP team, who are based in the offices of Exeter City Council, have produced and commissioned a number of evidence documents, they have completed (though not yet published) a Housing and Employment Land Availability Assessment (HELAA) and they have undertaken a wide range of additional tasks to support GESP production.

4 Previously proposed autumn 2018 GESP consultation

- 4.1 Strategic Planning Committee of this Council, on the 4 September 2018, received a report proposing consultation on a GESP document called "Our New Vision and How We Make It Real". This document contained a new (refined) vision for the GESP and more information on homes and infrastructure matters. It should be noted that this proposed consultation did not form part of the earlier work programmes but was felt to have merit in respect of gathering public feedback in order to inform overall GESP production. This report was scheduled to go to committees of the four planning authorities in the GESP partnership; each committee was recommended to approve the document for consultation. For East Devon see paperwork at:
<http://eastdevon.gov.uk/media/2581497/040918strategicplanningcombinedagenda.pdf>
and minutes at:
<http://eastdevon.gov.uk/media/2602297/040918-strategic-planning-committee-minutes.pdf>
- 4.2 The Strategic Planning Committee of East Devon District Council determined, however, not to approve the document for consultation and resolved (as noted in the minutes):
1. that before consultation, the consultation document "Our New Vision and How We Make It Real" be amended to:

- a. include reference to assisting the rural community;
- b. include reference to increasing healthcare provision in response to demographic changes;
- c. include entry level sports provision and sports hub;
- d. include provision of passing loop at Whimble, and other transport provision;
- e. include a review of energy needs and how to supply them;
- f. include an indication of forward funding; and
- g. include a clear set of questions that provide information that can be analysed.

2. That before consultation, the amended document be considered at a future meeting of the Strategic Planning Committee.

4.3 After the East Devon District Council committee, and the determination to not undertake the consultation as proposed, there was a meeting of the leaders and chief executives (or in some cases their representatives) to discuss next stages and the way forward. This meeting, which is one of the regularly held Growth and Development Board meetings, determined that it was not appropriate to resurrect and amend the proposed autumn 2018 consultation. Rather the intention now is to undertake a further, more comprehensive, additional stage of consultation in June 2019 (further details are provided below).

5 Future timetable for GESP production alongside East Devon Local Plan work stages

5.1 In the light of the additional consultation work proposed for June 2019 there is a need to amend the GESP timetable and the stages of work, as tabled over the page. To place future local plan work in the context of GESP timetables there is also commentary provided in the table, final column, on equivalent stages suggested for local plan work along with dates for this work.

5.2 This committee report does not comment in detail on matters that a new local plan for East Devon may address or go into great depth on production time lines. In the coming months a detailed action plan for production of a new East Devon Local Plan will be produced. It is highlighted, however, that GESP will only cover some of the bigger planning issues and make strategic (large scale) land allocations for development. A new local plan will need to address a wide range of subject matters and detailed policy considerations that do not feature in the GESP and a local plan will also need to make smaller scale (and potentially some larger) land allocations for development.

5.3 Whilst the GESP timeline will impact on making speedy progress on production of a new local plan (especially in respect of documents that we may make available for public consultation) there are a number of areas of work to support a local plan that can and will be started early on. These include evidence gathering as well as undertaking a critical review of existing local plan policies in light of the new NPPF and other new and emerging considerations. Such a review will help inform the appropriateness of rolling past policies forward or whether they need moderate or fundamental changes, or perhaps are not needed at all and whether there are new issues we need to address.

- 5.4 Members will note that the timeline for adoption of a Local Plan Review is a long way off but it is important to bear in mind that the GESP will supersede large sections of the currently adopted Local Plan and so in many respects the Local Plan Review is already well underway.

Date for GESP work	Key stage of GESP work with commentary	Commentary with dates for corresponding East Devon Local Plan work
February 2017	Consultation on the Issues report This work has been completed and a feedback report produced.	<i>The expectation is that there will be an issues report consultation on a new local plan though at this stage it is suggested this should also contain alternative development options (including possible site development options). It would seem inappropriate to start this consultation until after consultation on a draft GESP plan has concluded and consultation feedback is analysed. Therefore a date for this consultation of Spring 2020 is identified.</i>
June 2019	Consultation on draft policies and site options It is proposed that a series of potential options will be presented for public comment. The options may set out main policies proposed for inclusion in the plan along with options for sites or land areas for development. This further consultation will provide the means to address the concern expressed by members in respect of the now abandoned “Our New Vision and How We Make It Real” proposed consultation. It would be expected, however, to cover other issues as well.	<i>For a new local plan, assuming the above issues and options work is undertaken, this stage of work would not be needed. However, there would be positive potential in undertaking various wider public engagement events and such engagement could run through 2020.</i>
November 2019	Consultation on full draft plan Feedback from the draft policies and site options consultation, and further evidence gathering and assessment, will inform a full draft version of the plan which will go out for public consultation.	<i>We would envisage producing and consulting on a full draft of the local plan. It would, however, be inappropriate to undertake this prior to submission of the GESP for examination, so an Autumn 2021 date is proposed.</i>
February 2021	Publication (Proposed Submission) The publication stages is the point at which GESP in what the GESP authorities agree is the final form is made available for public comment.	<i>It would be inappropriate to go to publication of a new local plan before the adoption of the GESP. On this basis a Summer 2022 date is proposed for publication.</i>

Date for GESP work	Key stage of GESP work with commentary	Commentary with dates for corresponding East Devon Local Plan work
July 2021	Submission All comments made at the publication stage along with the plan itself and supporting evidence is submitted for examination (the paperwork is sent to the Planning Inspectorate).	<i>Submission of a new local plan to the Inspectorate for Examination would be likely to be in late 2022.</i>
September 2021	Inspector's Hearings The examination of the plan starts at the point of submission, however, a key part of the examination will be hearing sessions at which the inspector will hear verbal evidence in respect of the plan and objections to it. It is normal practice for inspectors to require modifications to be made to plans for them to be deemed to be sound and appropriate for adoption and these modifications will need to be consulted on.	<i>Hearing sessions for a new local plan would be expected in early 2023.</i>
April 2022	Adoption The examination concludes at the point at which the Inspector issues his or her final report. The plan can then be adopted by the Councils. Once a plan is adopted there are follow on tasks that are required in respect of final document production and publicity.	<i>Adoption of a new local may be expected in Summer 2023.</i>

6 Keeping planning policy up to date

- 6.1 There is a need to have up to date planning policy in place with this being an issue stressed in the National Planning Policy Framework, see for example paragraph 33 – which references the need for plan review “*at least once every five years*”, at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf
- 6.2 Noting that GESP now has an envisaged adoption date of April 2022 it is valuable to look at current local plan coverage across the four GESP planning authorities. In respect of how up to date plans will be:
- The East Devon Local Plan was adopted in January 2016 - GESP adoption would be more than six years after the local plan adoption;
 - The Exeter Core Strategy was adopted in February 2012 - GESP adoption would be more than ten years after local plan adoption;
 - Mid Devon currently have a Local Plan in production with adoption expected in 2019 - on assumption of the local plan being adopted the GESP adoption would be within the five year period; and
 - The Teignbridge Local Plan was adopted in May 2014 - GESP adoption would be around eight years after local plan adoption.
- 6.3 Given the fact that local plan policy coverage, across a number of the GESP planning authorities, including East Devon, is or will become dated, it can be seen to be of great importance to work to overall GESP plan production timetables. Linked to this is a need for partners to maintain a 5 year housing land supply wherever possible during the production of the GESP. Exeter already cannot show a 5 year supply and as such are pressing for rapid progress to be made on GESP.
- 6.4 GESP will cover some major but not all policy matters and therefore there can be expected to be some policy areas, as addressed in the existing East Devon Local Plan, which will be very out of date should timely progress on a new local plan for the District not proceed quite rapidly. The time lines set out in this report for a new local plan are seen as the quickest reasonable possible timescales to work to given the GESP timetable.

7 New local plan considerations in the absence of GESP

- 7.1 Should GESP not proceed (depending on when it is determined that it should not proceed) the timelines set out in this report for production of a new East Devon Local Plan could be a realistic timetable for work on a local plan that covers all matters (including strategic considerations that might have otherwise been addressed by GESP and other local plan matters). Should GESP be further delayed, however, it would be expected that this could delay production of a new East Devon Local Plan.

- 7.2 In terms of resources the pursuit of a Local Plan Review in the absence of GESP would involve similar resources with the two officers that currently form part of the GESP team being needed to provide the required resources to progress a full Local Plan process. We would of course benefit from the evidence work already undertaken by the GESP team and the savings that have already been achieved by jointly undertaking this work. There may also be potential for further work to be undertaken in partnership but it is likely that there would be additional costs in producing further evidence and additional examination costs in the event of the GESP not progressing to adoption.
- 7.3 In the absence of GESP members of this Council would need, at an early stage, to consider their aspirations and vision for a new local plan. GESP is being prepared as a plan that is ambitious in the outcomes it seeks and will have a vision for the whole Greater Exeter area that the strategy will be built around. Inevitably a Local Plan Review following a GESP will follow through on the detailed and more local aspects of that vision. In the event that GESP did not proceed Members would need to consider a vision for the Local Plan to include the wider strategic issues currently being considered through GESP. There is however an expectation that the draft vision for GESP is one that is shared by the partner authorities and therefore a vision for a non-GESP Local Plan Review would identify similar issues and aspirations. The main difference may be that rather than being delivered jointly slightly different approaches may be taken in the different authorities and discussed and co-ordinated through the duty to co-operate.
- 7.4 The role of the Council in the future delivery of the GESP is an issue that has yet to be fully addressed but there is growing evidence of a need for a more interventionist and proactive approach to delivery than any of the partner authorities have previously taken. This is endorsed by government guidance and reports which similarly indicate the need for this approach in order to secure high quality spaces and sustainable communities from large scale developments. Undertaking the investments and accepting the risks of this approach without the GESP partnership would be a very different proposition both in terms of the financial undertaking for the Council but also in terms of the potential to lever in funding from other sources. Government funding is increasingly focused around joint initiatives and working between authorities and so the opportunities for a single authority to access the levels of funding accessed in the past by EDDC to deliver infrastructure at Cranbrook no longer exist. In the event of the GESP not progressing the Council would need to carefully consider their approach in this area and tailor the vision and aspirations for the plan to reflect our commitment and ability to deliver.
- 7.5 A local plan that promotes significant change and one that seeks to place the council as a interventionist player in plan delivery could be expected to be more complex than one that seeks to take neither of these roles. In simple terms a plan that does not seek to bring about significant changes and one that does not set out an interventionist role for the Council will be much simpler, quicker and cheaper to produce.

8 Proposed East Devon District Council future staffing contributions to GESP

- 8.1 Being a partner in GESP production requires East Devon District Council to have staff in the GESP team. At present the Council have two staff members, a Senior Planning Officer

post and a Planning Officer post, in the GESP team. Both posts are, however, temporary and are due to terminate on the 16 April 2019.

- 8.2 It will be necessary for East Devon District Council to retain the input of two full-time staff members into GESP; therefore this committee report recommends funding the extension of these contracts for a further two years. This will take the contracts of employment from 17 April 2019 through to 16 April 2021. At this time it is unclear what capacity the GESP team will need going into examination of the plan and for post-examination work, however there may be a need for a further extension of these contracts once this is known.
- 8.3 By extending these GESP posts for a further two year period it will ensure that officers of East Devon District Council will be contributing to GESP all the way through to plan examination. Assurance of staff inputs and continuity of a staff involvement from this Council, in the GESP team, is critical for ensuring that plan production through to and beyond adoption is successfully undertaken.
- 8.4 It should be noted that member endorsement for ongoing staff involvement and employment in GESP will provide the basis for seeking to secure additional funding and budgets for completion of GESP. Furthermore one of the current GESP post-holders has been seconded from an existing post in the planning policy team and their position has been 'back-filled' by an additional temporary planning officer post. Through ensuring that the GESP posts are secured and funded through to 2021 it will provide a basis for submitting paperwork to ensure that the current temporary planning officer post, working directly in the planning policy team, can be extended, also for two years. The extension of the temporary planning officer post, with the post holder working directly in the policy team, will ensure that policy team work on production of Supplementary Planning Documents, other guidance and strategy documents can continue in an appropriate and timely manner. Extension will also ensure that resources will be available to make a start on early work for a new local plan for East Devon and that Neighbourhood Plan production is supported.

9 Financial implications and future contributions to GESP

- 9.1 There will be cost implications for the future production of GESP. To date, to cover the Years 2016/17, 2017/18 and 2018/19 the Council has provided £140,000 to GESP, though this figure does not include salaries for the two East Devon officers dedicated to GESP work.
- 9.2 Looking forward, from 2019 through to 2022 (i.e. for a three year period) there will be further costs associated with completion and adoption of GESP. The major cost areas identified, from an East Devon District Council perspective, are:
- **Employment of staff** – continued employment of two planning policy officers for two years, and to include 'on-costs' and an allowance built in for future pay rises, will cost in the region of £170,000. However one of the GESP staff members has a permanent contract of employment with the Council and he is seconded into the GESP team. On the basis that he actually has an East Devon salary already the net extra cost to the Council for the two posts, for two years, is a little over an estimated

£87,000 – or around £43,500 per year. As one of the posts is a secondment it was also necessary to recruit on a fixed term contract cover for that post and it is proposed that this arrangement is also extended for a further two years to enable progress on DPD's, SPD's and other policy work to progress unaffected. This would bring the total additional cost per annum to £74,800.

- **Technical and evidence work on GESP production** – much of the cost on technical work to date has been spent on employing consultants (many work areas are very specialist in nature and do require specific specialist skill sets). Going forward there is likely to be less need for employment of consultants and total monies for technical work on GESP is estimated at £150,000. A five way equal split across the partner authorities would lead to an East Devon District Council contribution of £30,000.
- **Cost of the examination** – the Planning Inspectorate charge for examinations and also there will be a need for the partners authorities to employ (either directly or on a consultancy basis) a Programme Officer to assist the Inspector in the smooth and efficient running of the Examination.
- **Other costs** – there will be further smaller costs also associated with GESP production but these will be covered in the above estimates or will be met through other existing budgets. Costs could include – printing, postage, room hire for exhibitions and the like. There will also be costs associated with member involvement and decision making in respect of GESP, but again these are assumed to be covered from existing Council budgets.

9.3 Endorsement by this Strategic Planning Committee to future working on GESP will form a basis for a submission through the current budget rounds for GESP funding.

9.4 There may be Government funding to contribute to GESP and GESP related projects, schemes and proposals. Where the Government (or others) invite bids for funding for projects or initiatives these are scrutinised with respect to possible GESP relevance. Any monies secured through bids may offset some of the funding that would otherwise fall to the partner local authorities or it could provide scope for undertaking additional work. It should also be noted that developments secured as a consequence of GESP proposals, such a new house building, may secure additional Government funds, for example in the form of New Homes Bonus.

Report to: Strategic Planning Committee
Date of Meeting: Tuesday 27 November 2018
Public Document: Yes
Exemption: None



Review date for release None

Agenda item: 10

Subject: **S106/Community Infrastructure Levy Developer Contributions Annual Report 2017/18**

Purpose of report: This report focuses on the financial contributions paid to East Devon District Council, the sums paid, where these have been spent and the balance of unspent monies at the end of the last financial year. It also reminds Members of the way that we collect financial contributions through CIL (Community Infrastructure Levy).

Recommendation: **That the contents of this report be noted.**

Reason for recommendation: To inform Strategic Planning Committee on the progress made on planning obligation matters between April 2017 and March 2018.

Officer: Sulina Tallack – Planning Obligation Officer - Ext: 1549 - stallack@eastdevon.gov.uk

Financial implications: All financial information is contained within the body of the report.

Legal implications: Planning obligations governed by section 106 of the Town and Country Planning Act 1990, as amended. The Community Infrastructure Levy is governed by the Planning Act 2008, as amended and the Community Infrastructure Levy Regulations 2010 as amended. This report ensures the Council as Local Planning Authority is transparent in how it collects and proposes to spend such funds. There are no legal implications other than as set out in the report

Equalities impact: Low Impact

Risk: Medium Risk

The risk associated with not monitoring planning obligations relating to planning applications is that the Council could be criticised for not operating a transparent and comprehensive framework for monitoring such financial and non-financial obligations. Without adequate co-ordination Commuted Sums could be spent on inappropriate schemes and not on priorities identified within the Council's various plans and strategies. Without an adequate and co-ordinated system for monitoring Section 106 Agreements and any subsequent Commuted Sums it is possible that should deadlines expire, secured sums would have to be returned (plus interest) to the developers and required community facilities /affordable housing would not be provided.

If CIL is not effectively monitored the Council could fail to identify receipts that would contribute towards the infrastructure identified within our Regulation 123 list. Ineffective collection and enforcement would delay timely delivery. We are required by Regulation 62 of the CIL Regulations to report on the CIL receipts and expenditure for a reported year, which for the avoidance of doubt is the financial year from April 2017 to March 2018.

Links to background information:

- [Council Report April 2016 – Introduction of CIL](#)
- [S106/Community Infrastructure Levy Developer Contributions Annual Report 2016/17](#)

Link to Council Plan: Encouraging communities to be outstanding; Developing an outstanding local economy; Delivering and promoting our outstanding environment; and Continuously improving to be an outstanding council.

1 Background

- 1.1 This report relates to the management and allocation of resources accrued through planning obligations and is the latest in a series of annual reports on the spend of monies collected through Section 106 agreements. This latest report will also advise on the monies collected from the Community Infrastructure Levy (CIL) which has been collected in the 17/18 financial year.
- 1.2 Planning Obligations, commonly known as Section 106 Agreements, were introduced following the Town and Country Planning Act 1990. Section 106 Agreements are legal agreements and are negotiated between a local authority and developers, and are intended to enable infrastructure contributions to be made in order to make a development proposal acceptable. An Agreement must be fairly and reasonably related in scale to the proposed development and be directly related to the development, and should only be used where planning conditions attached to a planning permission would not provide an alternative approach.
- 1.3 Since the adoption of CIL most Section 106 Agreements relate to the delivery of infrastructure on the development site itself and are requirements placed directly on the applicant or land owner. CIL being paid to contribute to the cost of strategic infrastructure projects. However there remain a number of extant agreements that pre-date the adoption of CIL that make provision for the developer to pay a financial sum (a commuted sum) for a project to be implemented directly by the Council. This is because prior to the implementation of CIL Section 106 agreements were used to secure all infrastructure associated with a development. The Council still has a number of projects being delivered under consents granted prior to the adoption of CIL and therefore we are still collecting and spending monies under old Section 106 agreements.
- 1.4 CIL (Community Infrastructure Levy) is often confused with Section 106, or mistakenly taken to be the same thing. Community Infrastructure Levy is a tariff based system designed to cover the costs of all strategic infrastructure needs which are listed on the Regulation 123 list published by the Council. In order to calculate a Community Infrastructure Levy tariff, a council will consider the total costs of delivering strategic infrastructure (such as schools, transport and flood defences) against the total scope of

development expected in an area and the ability of developments to contribute to the costs of the required infrastructure.

- 1.5 The Council has been charging CIL since September 2016 and has this year revisited its process to determine CIL spend through the CIL Members Working Party.

2 The spending of s106 contributions

- 2.1 Councils are restricted to spending s106 contributions on a defined purpose within each agreement or undertaking. Under the regulations we can no longer pool more than five obligations together to pay for a single infrastructure project or type of infrastructure and we cannot require contributions from small scale developments. These restrictions have forced us and other Council's to adopt CIL as often large pieces of infrastructure can only be funded through contributions from a large number of developments and this can only now be achieved through CIL. The government has consulted on proposals to remove the pooling restrictions on large strategic developments but the relevant legislation has not been brought forward.

- 2.2 The following graphs illustrate the cash flow of Section 106 monies over the years 2011 – 2016 and then over 2017.

Table 2.1: S106 transactions for the last five financial years with 2017/18 alongside for comparison

Section 106 - Prior Years Cashflow

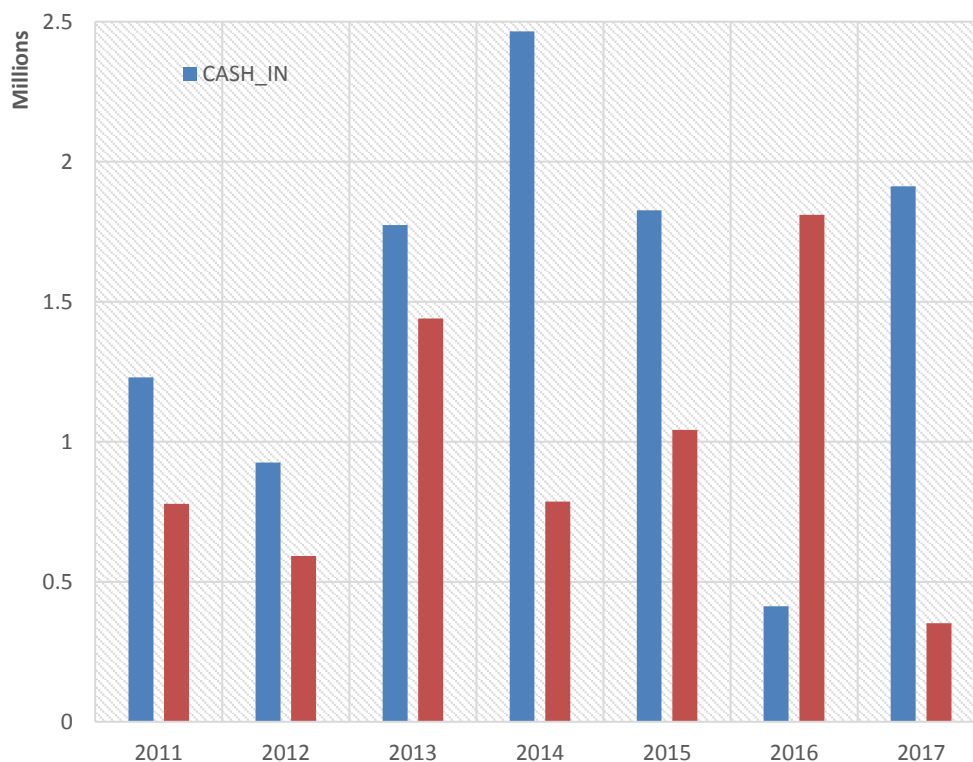


Table 2.2: S106 monies spent in 2017/18

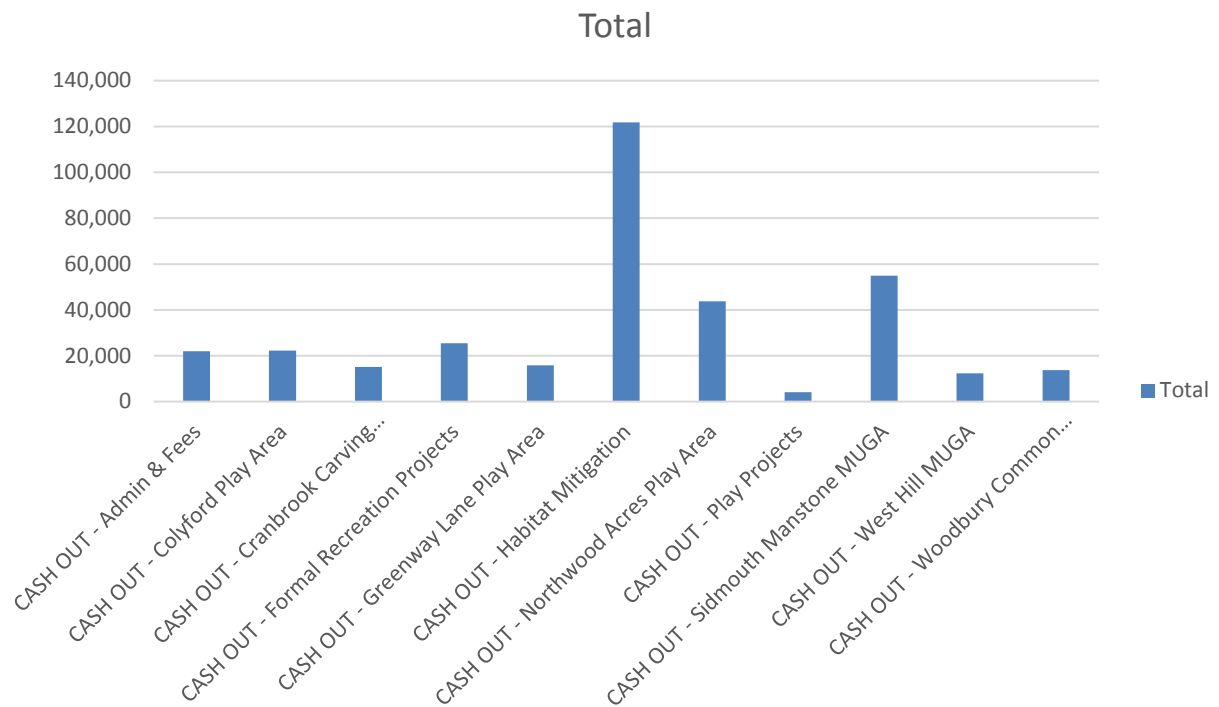


Table 2.3: Within the year there was an actual spend of just over £350,000 on the following items:

Project	Amount
Admin, Maintenance	22,021
Colyford Play Area	22,312
Cranbrook Carving Community	15,077
Formal Recreation Projects	25,486
Greenway Lane Play Area	15,900
Habitat Mitigation	121,786
Northwood Acres Play Area	43,809
General Play Projects	4,171
Sidmouth Manstone MUGA	54,902
West Hill MUGA	12,400
Woodbury Common Playing Fields Trust	13,800
Grand Total	351,665

- 2.4 As an example Cranbrook's new Community Shelter (aka Carving Community Project) – built by the young people of the town, for the use and enjoyment of residents.
- 2.5 The young people themselves came up with the design and with the support of professionals worked with tools to bring out the character and beauty of the oak timber. In addition to learning construction skills, they had also developed patience, resilience and communication skills as well as a love of working outdoors.
- 2.6 It really is a beautiful structure. As well as being eye-catching, the shelter is designed to provide welcome shade for users of the Country Park on hot days.
- 2.7 At year end 2017/18 a total of £4.978,000 was held in the s106 account (note that a proportion of this is based upon invoices raised and outstanding at year end).



3 Introduction of CIL – Progress Report

- 3.1 The way that we have traditionally delivered the infrastructure necessary to ensure that development is sustainable has been through s106 obligations. The policy restrictions have meant that this is less achievable and encouraged a move towards the introduction of CIL. As a LPA we went live with Community Infrastructure Levy (CIL) on 1 September 2016. The new CIL has not fully replaced s106 obligations but is an alternative to the way in which we have historically secured obligations. S106 is still the preferred method for securing all on-site infrastructure not identified on our regulation 123 list.
- 3.2 The following table shows a summary of CIL potential income, monies due and collected during the 17/18 financial year. This is broken down by the main areas of spend of CIL admin costs. The neighbourhood proportion going to town and parish councils and the remainder left for spend on reg 123 projects.

Table 7.1 CIL overview of financial year 17/18

From	01 April 2017	To	31 March 2018
Allocation	Potential	Due	Collected
CIL Admin	38,752.32	0.00	19,804.31
Neighbourhood CIL	120,936.24	0.00	60,403.24
CIL 123 List	615,357.88	0.00	315,878.80
TOTALS	775,046.44	0.00	396,086.35

- 3.3 The CIL Regulations allow the Council to retain up to 5% of the CIL receipts in the first three years to fund set up and ongoing costs, and 5% annually for ongoing costs thereafter. This pays for ICT systems required, additional Officer costs, training etc.
- 3.4 The Localism Act identified that a “meaningful proportion” of CIL funds would need to be transferred to town and parish councils for use on local priorities. The CIL Regulations were amended in 2013 to identify exactly how much that “meaningful proportion” must amount to. The exact percentage varies depending on whether a town or parish council has an adopted Neighbourhood Plan or not and whether an area is parished or not. After the first eighteen months £61,476.76 was paid out to East Devon parishes as broken down in table 7.5.

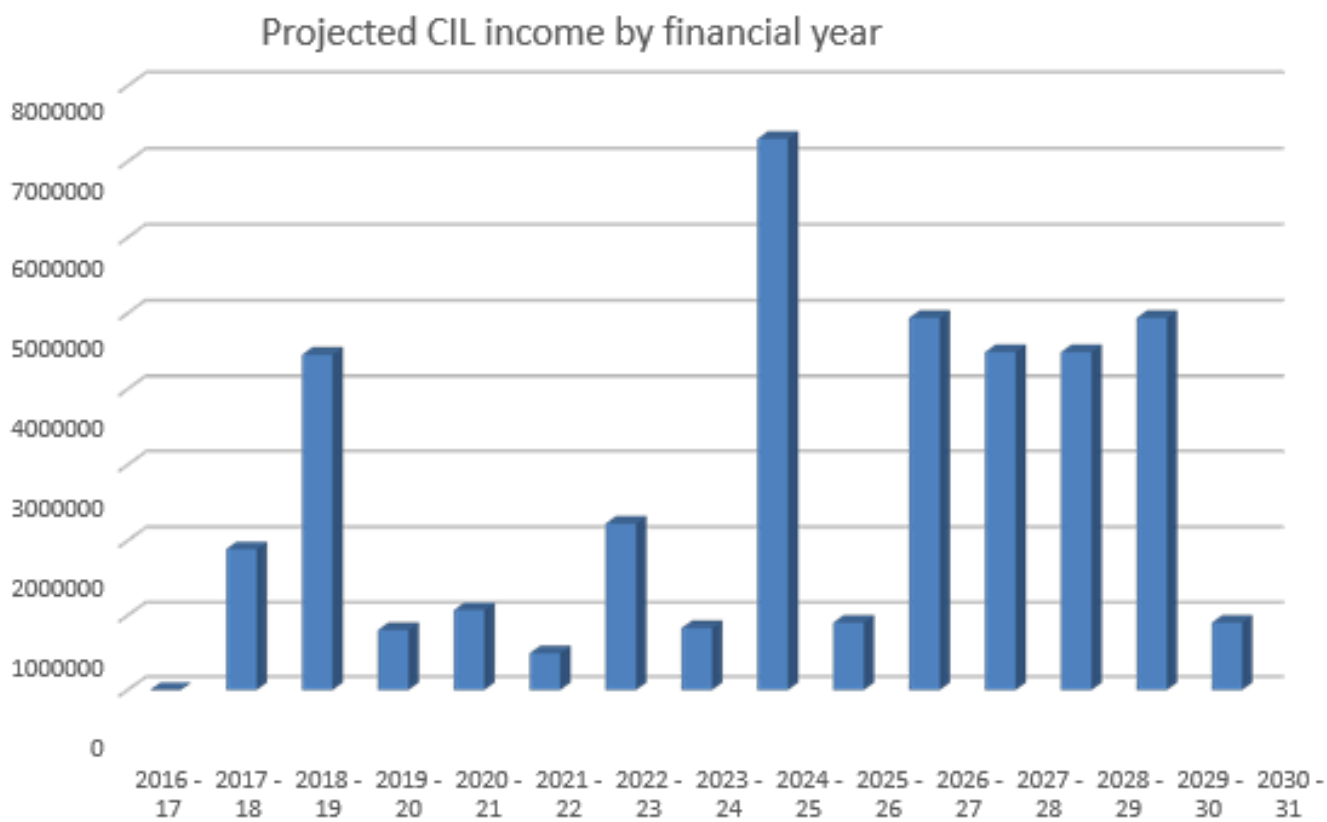
Table 7.5: Neighbourhood Proportion Payments

Parish	2016/17 Oct - Mar	2017 Apr - Sep	2017/18 Oct - Mar	Total £
Axminster	0	111.62 *overpayment to be rectified 18/19 financial year due to parish plotting error	0	111.62
Beer	0	0	296.26	296.26
Budleigh Salterton	0	0	2653.11	2653.11
Chardstock	303.75	0	464.87	768.62
Clyst St George	0	1191.67	0	1191.67
Exmouth	0	9789.59	42203.47	51,993.06
Newton Popleford	625.50	432.85	303.75	1,362.10
Offwell	0	742.81	345.58	1088.39
Ottery St Mary	0	0	595.83	595.83
- West Hill	0	299.68	299.68	599.36
Seaton	0	35.59	0	35.59
Sidmouth	0	182.72	353.64	536.36
Uplyme	0	0	244.79	244.79
TOTAL	£929.25	£12786.53	£47760.98	£61,476.76

- 3.5 Taking account of the above, across the district as a whole this leaves around 76% of the Total CIL Income available for the Council to use towards required and identified infrastructure. Currently this is forecast to be around £30.8m over the Local Plan period. Note that this includes our contribution towards the capital element of Habitat Mitigation. In our IDP the projected infrastructure costs associated with delivering the adopted Local Plan, and the emerging Cranbrook Plan are in the region of £350 million.
- 3.6 Although there was a call for CIL projects in the 2017/18 financial year there were no projects allocated funding from the CIL 123 budget. This formed a separate report to this Committee. With regard to the future spend of CIL Members agreed at their meeting of the 24th July 2018 to:
1. Defer the bidding process for spending CIL until 2019 at the earliest;
 2. To focus CIL spending on infrastructure projects identified in the Infrastructure Delivery Plan (IDP) that are:
 - a. Known to be required to deliver development, and;
 - b. Identified as meeting the highest priority status;
 3. The CIL Member Working Party to meet again in September to consider the key infrastructure projects from the IDP to be prioritised.
 4. That no further CIL spend is undertaken until the identified projects have been delivered.

Officers are currently liaising with infrastructure providers to identify the highest priority projects before convening a meeting of the CIL Member Working Party. Unfortunately this has taken longer than envisaged largely because of a lack of response from some infrastructure providers. To date there has been a total spend of £19,804.31 from the CIL admin budget on staff and other admin costs. In addition money has been from the Neighbourhood CIL budget to the parishes in the amounts listed above. There have been no payments in kind and no receipts recovered from Town/Parish Councils. Of the 402,461.35 collected from the launch of CIL until the end of the 17/18 financial year, £321,180.28 has been retained.

3.7 The following graphs show forecasts for CIL income over the plan period by financial year and the totals:



- 3.8 It is clear from these charts that CIL income will be inconsistent over the plan period with higher levels of income expected when large scale housing developments commence. The second graph shows how it will take many years for the CIL pot to grow to an extent that large scale projects can be afforded. For example a potential key project may be a passing loop on the Exeter to Waterloo railway line at an estimated cost of over £7 million. If this project were entirely funded from CIL then it would not be until the 2023 – 24 financial year that sufficient funds will have been received to pay for this project by the time that we have top sliced for admin/neighbourhood proportion and Habitat Regs. In reality such a project should be match funded from other sources but it illustrates how when making funding decisions for smaller projects thought also needs to be given to how larger scale projects may be funded in the future.

4 S106 and CIL Monitoring

- 4.1 EDDC has an Officer dedicated to the negotiation, monitoring and delivery of planning obligations. This long standing post has been supported by the role of Planning Obligation Support Officer who has aided the introduction and administration of CIL and will be funded by the admin element of the CIL receipts.
- 4.2 To aid the works of the two posts we have introduced CIL/S106 Administrator product called EXACOM. It is designed to take the sting out of administration, and enables an administrator to capture information, calculate charges, levies, surcharges etc., generate notices and manage finance. We now have all live S106 agreements and CIL activity on the system and have visited every agreement in order to bring it up to date and have identified in excess of 700 agreements to be removed as Land Charges.
- 4.3 The figures within this report are held within the councils' databases and are proactively monitored to aid delivery of infrastructure by ensuring all obligations are met and any associated spend is in accordance with the specified infrastructure need. S106 breaches are referred to our legal department for enforcement action to be taken.
- 4.4 Community Infrastructure Levy Regulations 2010 contain enforcement provisions, aimed at ensuring that the collection process runs smoothly, by giving collecting authorities the power to issue a range of surcharges, stop notices, and if necessary to recover funds by appropriate legal action. Collection and enforcement arrangements are supported by the right to appeal certain decisions.
- 4.5 In the majority of cases the developers follow the correct process, however, where a developer has failed to submit a Commencement Notice prior to development commencing, the CIL Regulations provide that the liable person(s) will no longer be able to benefit from the Instalment Policy and the development will cease to be eligible for social housing relief or exemptions for self-build housing or annexes. In addition the Council may issue a surcharge of 20% of the liable amount or £2,500 whichever the lower amount.

- 4.6 Where there are problems in collecting the levy, the CIL Regulations have made provision in that the collecting authorities are able to penalise late payment and discourage future non-compliance.
- 4.7 The regulations provide for a range of proportionate enforcement measures, such as surcharges on late payments (as set out in [regulations 80 to 86](#)). In most cases, these measures should be sufficient.
- 4.8 In cases of persistent non-compliance, collecting authorities may take more direct action to recover the amount due. For example, a collecting authority may issue a Community Infrastructure Levy Stop Notice (under [regulations 89 to 94](#)), which prohibits development from continuing until payment is made and the stop notice is withdrawn.
- 4.9 The collecting authority may, after issuing a reminder notice to the party liable for the levy, apply to a magistrates' court to make a liability order allowing it to seize and sell assets of the liable party. A party may also apply for a charging order if there is at least £2,000 owing. The court can issue an order imposing a charge on a relevant interest to secure the amount due.
- 4.10 In the very small number of cases where a collecting authority can demonstrate that recovery measures have been unsuccessful, they may apply to a magistrates court to send the liable party to prison for up to 3 months (under [regulations 100 and 101](#)).

Report to: **Strategic Planning Committee**

Date of Meeting: Tuesday 27 November 2018

Public Document: Yes

Exemption: None

Review date for release None



Agenda item: 11

Subject: **Government response to consultation on Developer contributions**

Purpose of report: To outline the Government response to the public consultation on supporting housing delivery through developer contributions, which took place from March – May 2018. The Government have provided a summary of consultation responses and presented their view on the way forward. The opportunity is also taken within the report to update Members on the revision of the Community Infrastructure Levy Charging Schedule in East Devon.

Recommendation: **Members are asked to note:**

- **the Government response to consultation on reforming developer contributions;**
- **the update on preparation of a revised East Devon Community Infrastructure Levy Charging Schedule**

Reason for recommendation: To keep Members informed on both Government proposals to reform developer contributions, and progress on revising East Devon's Community Infrastructure Levy Charging Schedule

Officer: Keith Lane, Planning Policy Officer

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Tel: 01395 571684

Financial implications: All financial discussion points are addressed in the body of the report

Legal implications: There are no legal implications other than as set out in the report

Equalities impact: Low Impact

Low Impact

Risk: Low Risk

Risk considerations are low as the report merely notes the Government response to consultation on reforming developer contributions, along with a progress update for revising East Devon's CIL Charging Schedule.

Links to background information:

- Supporting housing delivery through developer contributions – consultation, MHCLG, March 2018:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/691182/Developer_Contributions_Consultation.pdf

- Agenda for Strategic Planning Committee, 24 April 2018, item 8: <http://eastdevon.gov.uk/media/2445987/240418strategicplanningcombinedagenda.pdf>
- Minutes of Strategic Planning Committee, 24 April 2018, item 41: <http://eastdevon.gov.uk/media/2459407/240418-strategic-planning-committee-minutes.pdf>
- Government response to supporting housing delivery through developer contributions, MHCLG, October 2018: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752183/Developer_Contributions_Government_Response.pdf
- Minutes of the Meeting of the Council, 20 April 2016, item 78: <http://eastdevon.gov.uk/media/1684688/200416-council-mins.pdf>
- East Devon adopted CIL Charging Schedule: <http://eastdevon.gov.uk/media/1680258/adopted-charging-schedule.pdf>

Link to Council Plan: Encouraging communities to be outstanding; Developing an outstanding local economy; Delivering and promoting our outstanding environment; Continuously improving to be an outstanding council

Report in full

1. Introduction

- 1.1 In March 2018, alongside consultation on the draft National Planning Policy Framework, the Government also issued a consultation seeking views on a series of reforms to the system of developer contributions. This consultation included proposals to simplify the process for setting the rate of Community Infrastructure Levy (CIL) in a charging schedule; lift the section 106 pooling restriction in certain circumstances; and remove the requirement for a 'regulation 123' list of infrastructure that can be funded by CIL, to be replaced by Infrastructure Funding Statements.
- 1.2 Members will recall that the April 2018 meeting of this committee endorsed a response to this Government consultation. The Government has now responded to the consultation through a summary of consultation responses, and has presented their view on the way forward.
- 1.3 The purpose of this report is to provide an outline of the Government response, focussing on key points of interest; and to also note progress on the revision of East Devon's Community Infrastructure Levy Charging Schedule (the document that sets the rate of CIL).

2. Government response to consultation on supporting housing delivery through developer contributions

- 2.1 There were 309 responses to the Government consultation on supporting housing delivery through developer contributions, around half of which were submitted by local authorities, with the remainder from private sector organisations, town and parish councils, and other interest groups. A summary of key points of interest in the Government response is set out below.

Ensuring that consultation is proportionate

- 2.2 The current requirement for preparing a charging schedule is for two rounds of consultation (on a 'preliminary draft' and a 'draft'). There was broad support for the

Government proposal's to streamline this requirement, and they now intend a more proportionate approach to consultation. There will continue to be an obligation to consult on draft charging schedules, but the current requirement for two separate rounds of consultation will be removed. This will make it quicker to prepare a charging schedule, and is something that this council supported in its response to the consultation.

Removing unnecessary barriers: the pooling restriction

- 2.3 There is currently a limit on the pooling of section 106 contributions, which means that no more than five such contributions can be collected for the same infrastructure project or type of infrastructure (where entered into since 6 April 2010). The Government consultation proposed to lift this restriction in certain circumstances.¹
- 2.4 There was broad support in the consultation for removing the pooling restriction, including from this council. There was particular support for lifting the restriction in all areas, and the Government now intends to do this. Given that the pooling restriction was a key to encouraging councils' to introduce CIL, the Government will put measures in place to incentivise the uptake and continued use of the Levy to collect contributions towards addressing the cumulative impact of development; although they have not said what these measures are.

Improving transparency and increasing accountability

- 2.5 In order to improve transparency around the system of developer contributions, the Government is taking forward proposals to require reporting of contributions from CIL and s.106 planning obligations in an "Infrastructure Funding Statement". These statements will be prepared by local authorities, and are supported for providing greater clarity and transparency.
- 2.6 Alongside this, the Government are removing restrictions related to regulation 123, which prevent s.106 contributions being sought for infrastructure projects or types that are on the 'regulation 123 list'. It is intended that the Infrastructure Funding Statement will improve transparency and accountability by providing information on how developer contributions are being spent.
- 2.7 There is currently some uncertainty around using s.106 obligations to collect monitoring fees, and the Government intend to address this by making clear that local authorities can seek a fee from applicants towards monitoring planning obligations. The Government will consider how to ensure that these monitoring fees are set at an appropriate level.

Other proposals

- 2.8 The Government response also identifies several other proposals for supporting housing delivery through developer contributions; for example to:
- Improve guidance on the level of detail needed to establish an evidence base for CIL charging schedules and plan-making
 - Consult on changes to the indexation of CIL rates, which will index CIL rates for residential development to the House Price Index, and non-residential development to the Consumer Price Index

¹ Where the local authority is charging CIL; where it would not be feasible for the authority to adopt CIL in addition to securing the necessary developer contributions through s. 106; or where significant development is planned on several large strategic sites.

- Enable Combined Authorities to take forward a Strategic Infrastructure Tariff, and in the longer term allow joint planning committees to do the same (options for giving other groups the power to introduce a Tariff will also be reviewed)
- Amend guidance to encourage groups of local authorities to support the delivery of strategic infrastructure through pooling CIL receipts

2.9 Legislation will be required to implement the proposed changes, and the Government will consult on draft regulations later this year.

3. Update on the preparation of a revised East Devon Community Infrastructure Levy Charging Schedule

- 3.1 The council adopted its current Community Infrastructure Levy Charging Schedule in April 2016, and began charging CIL on 1 September 2016. On adoption, the council committed to an early review of the charging schedule.
- 3.2 One of the key reasons for reviewing and then revising the charging schedule is to align with the emerging Cranbrook Plan. This will ensure a consistent approach to infrastructure delivery at Cranbrook (i.e. s.106 rather than CIL), and align the boundary of Cranbrook in the Cranbrook Plan with that of a revised CIL charging zone. The revised charging schedule can also take account of updated national policy and guidance, latest information on development costs and values in East Devon, and any lessons learnt from applying the current charging schedule.
- 3.3 The council has appointed consultants to prepare viability evidence that will inform the revised East Devon CIL Charging Schedule. They have been working on the evidence of costs of development and viability work alongside their work on the Cranbrook Plan and should be in a position to present their findings early next year so that a revised charging schedule can be taken forward alongside the Cranbrook Plan. As previously highlighted, the Government intend to require only one consultation stage in preparing a charging schedule, rather than two as currently. This change will need amendments to regulations, so there are risks with progressing the Charging Schedule ahead of this – we will need to ensure that the first stage of consultation is consistent with existing regulations, mindful that likely changes could mean this is the only round of formal public consultation. Alternatively, if final regulations are not published in time, a further round of public consultation will be necessary.
- 3.4 The council will also progress the revised charging schedule on the assumption that the pooling restriction will be lifted. Again, this will require amended regulations to confirm the Government's proposal.
- 3.5 It is considered that when the Government has published draft CIL regulations for consultation later this year, it should provide sufficient certainty for the council to progress its revision of the Charging Schedule. Therefore, a provisional timescale is to hold public consultation on a revised Charging Schedule in the spring 2019, with a view to submitting the Charging Schedule for Examination alongside the Cranbrook Plan in the summer (2019). This timescale will require the final amended CIL regulations to be published by the spring.

Report to: **Strategic Planning Committee**

Date of Meeting: Tuesday 27 November 2018

Public Document: Yes

Exemption: None

Review date for release None



Agenda item: 12

Subject: **Heritage Strategy**

Purpose of report: To agree a draft Heritage Strategy for public consultation. The strategy (2018 – 2031) brings together information on the heritage of East Devon and identifies the issues, challenges and opportunities for the future with a plan of recommended actions.

Recommendation: **That Members:**

Agree the draft Heritage Strategy for public consultation in accordance with the adopted Statement of Community Involvement.

Reason for recommendation: The NPPF (para.185) states that “Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.” The Local Plan outlines its policies and broad strategies for the district’s heritage, whilst the Heritage Strategy sets out more detailed aims, objectives and a plan of recommended actions. A public consultation on the draft strategy will ensure that we receive feedback on our proposals and that our approach is undertaken in an open and transparent way and that we have addressed the most relevant issues.

Officer: Jacqui Best Telephone: 01395 517483; JBest@eastdevon.gov.uk

Financial implications: No specific financial implications

Legal implications: The legal implications are as set out within the report

Equalities impact: Low Impact
No particular equalities impacts are identified

Risk: Low Risk

The publication of a heritage strategy will help to protect, manage and enhance our historic environment and heritage assets, whilst encouraging social, economic and environmental benefits.

Links to background information:

- Government Policy is set out in the National Planning Policy Framework (2018) in 16: Conserving and enhancing the historic environment
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf

- The Town and Country Planning Act 1990 and the Planning (Listed Buildings and Conservation Areas) Act 1990
<https://www.legislation.gov.uk/ukpga/1990/8/contents> and <https://www.legislation.gov.uk/ukpga/1990/9/contents> provide specific protection for buildings and areas of special architectural or historic interest
- The Ancient Monuments and Archaeological Areas Act (1979)
<https://www.legislation.gov.uk/ukpga/1979/46> provides protection for scheduled monuments.

Link to Council Plan:

Delivering and promoting our outstanding environment

Report in full

This report introduces a draft heritage strategy for East Devon and recommends that public consultation is undertaken. On conclusion of the consultation a feedback report on comments made will be presented to this committee with recommendation for amendment to the strategy, where appropriate.

The draft strategy, in full, that is recommended for consultation is appended to this committee report.

1. What is Heritage?

The term heritage embraces history in all its forms, from buildings, spaces, art and artefacts to natural heritage such as landscape, flora and fauna and cultural heritage including place names, customs and traditions.

The Historic Environment is described in the NPPF (2018) as “all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.”

A Heritage Asset is described in the NPPF (2018 para 185.) as “a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).”

2. Why is a Heritage Strategy necessary?

The National Planning Policy Framework (2018 p.185) states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment. East Devon has a rich historic environment and an abundance of heritage assets that provide very significant environmental, social and economic benefits for the district. These assets are an irreplaceable resource and the strategy will help to ensure that they are protected, maintained and enhanced to the advantage of future generations.

3. What does the Strategy cover?

The strategy presents a summary of the historic environment of the district, its significance and its benefits. It identifies the heritage issues in East Devon and develops objectives for the future with an action plan for the delivery of our recommendations. The strategy is proposed to cover the period until 2031, to run alongside the East Devon Local Plan 2013 – 2031.

Whilst all historic influences on the character of East Devon inform the strategy, the focus is directed towards our heritage assets where the Council has a direct role and responsibility, or influence, in the decision making or management process.

However broader designations that inform the strategy are also considered, including the two Areas of Outstanding Natural Beauty that have a positive influence on the enhancement and management of the District's heritage.

Section 1:

Following an introduction, this sets out the purpose of the strategy, provides information on the role of the Council and other organisations, sources of information and a background of legislation and policy.

Section 2:

The overall strategy for the future of our heritage is met through a range of aims and objectives. These are addressed in the three themes of:

A: Understanding and appreciating our historic environment

This theme describes our historic environment and provides information on its designated heritage assets and their significance, including Conservation Areas, Listed Buildings, Listed Parks and Gardens, Scheduled Monuments, the World Heritage Site coastline and landscape designations and touches on undesignated assets including archaeology.

B: Positively managing our historic environment

This theme sets out our current policies and programmes relating to development management, Conservation Areas and heritage assets at risk. It identifies issues and looks at the future programme of managing these designated assets and the potential for a local list of undesignated assets, whilst providing further guidance on local distinctiveness.

C: Enhancing and benefitting from our heritage

This theme looks at the value of our heritage as a part of sustainable development, and the social, economic and environmental benefits it provides for East Devon, whilst the impact and influence of other policies are considered. It identifies how we can work better with partners and communities to enhance our heritage and make the most of these benefits.

Section 3:

Implementation of the strategy is considered including resources, benefits and monitoring. The objectives raised from each theme are developed into a plan of recommended actions, detailed initially for the first three years.

Section 4:

Appendices include a summary description of the Conservation Areas of East Devon, information and maps for each of our historic town centres, details of partners and local history organisations.

4. Recommendations

It is recommended that the draft heritage strategy is approved for the purpose of a public consultation. Following the consultation, it is recommended that a more detailed action plan is produced to incorporate feedback, to be published alongside the final Heritage Strategy.

Within the action plan, some actions will benefit from additional resources from staff and the community. This mainly relates to facilitating training for communities to help manage the assets in their local area, with supervision. Some training resources are currently available through partners and additional grant funding will be sought. It is recommended that staff within the planning policy team help to facilitate this process in order to minimise the amount of any additional work that would be needed by conservation officers.

5. Benefits

The benefits that can be sustained and enhanced through delivery of the strategy are wide ranging. Theme A aims to improve knowledge and understanding of the heritage of East Devon by making information accessible to a wide audience and by promoting its value. Benefits include an increased awareness and appreciation of our heritage, active participation in heritage programmes and a feeling of identity and pride in local areas.

Theme B explores how we manage our heritage assets and aims to develop programmes and increase community involvement, building on the strong neighbourhood planning groups and historic societies in East Devon. This will increase the range of skills, knowledge and experience to help conserve our heritage.

Further, Historic England reports on growing evidence of a positive relationship between heritage participation, wellbeing and quality of life, which finds that both visiting and volunteering in heritage brings happiness.

For organisations, programmes involving the community encourage innovative ways of working, demonstrate public accountability and strengthen links with the community.

Theme C looks at how heritage can boost the economy through tourism and the attraction of our historic town centres, both directly, through the employment of specialised craftsmen and use of local materials, and indirectly through increased appeal for tourists, businesses and residents.

Our built heritage often plays a central role in the regeneration of towns, with both people and businesses being attracted to characterful places. Developing partnerships can help to maximise the economic benefits and opportunities that heritage brings.

Environmentally, the positive conservation of our heritage assets helps to reinforce local distinctiveness and encourage high quality design.

6. Resource Implications

The actions recommended have been carefully considered and are either a priority due to fulfilment of a statutory duty, or are expected to produce significant beneficial outcomes and impact in the future, whilst minimising resources in the long term. Opportunities for cost effective solutions are sought including the means for securing new grant funding.

In East Devon communities have taken on ownership and accountability of their local area through neighbourhood plans, with volunteers driving the process forward. Along with specialist historic groups, this impetus may be captured and taken forward. Participation of the community in helping to deliver parts of the strategy will potentially provide a valuable resource, contributing to its progress.

The strategy plans to introduce resourceful ways for communities to help manage assets in their local areas through a small number of pilot schemes initially. These would be closely monitored to assess costs, outcomes and impact to inform the future roll-out of programmes.

The investment of staff time facilitating and advising on training will be needed especially in the early stages, but as the programme develops, capacity should build within local communities to help manage their own assets. Training is currently available for some projects and the Council is pursuing grant funding opportunities to support further work.

Some specific tasks to help manage our heritage assets have been identified that staff within the policy section may perform, with the help of the community in some cases, with a 'light touch' sign off by conservation officers.

The draft action plan has been based on the premise that such staff resources within the Council can be enlisted to carry out these duties. If this were not possible however, further resources would be needed to fully implement some priorities of the strategy during the delivery of the programme, for which external grant funding would be sought.

Cost effective ways of widening knowledge and engagement in our heritage include circulation of the strategy in an accessible format and the provision of a more comprehensive website resource. New web pages can provide a base for the exchange of information and links to other organisations, guides and training in heritage issues.

An occasional heritage themed event at the Council offices and officer presence at other events are achievable ways of networking and promoting the heritage of East Devon. Local organisations such as the East Devon AONB and Devon County Council Historic Environment Team have offered support for the strategy and these partnerships can be further developed to pool resources and deliver some common objectives effectively.

It will be important however, that expectations by communities are carefully managed, for example in respect of the local list, which will particularly need staff resources initially to consider items put forward for the list. Ample time will therefore be needed to establish a list within existing resources and this is reflected in the draft action plan (see document).

A summary of the action plan is provided in **Table 1** and a plan outlining a potential programme for the next 12 years is provided in **Table 2**.

Table 1: Summary of recommended actions with estimate of impact and resources:

Action	Priority, estimated impact and resources
Produce information and guidance in strategy in an accessible format. Promote strategy.	High impact / moderate cost; much of this work completed. Enhances knowledge and understanding of our heritage.
Develop improved web pages for the exchange and provision of information, including links to further guidance.	High impact / low cost, enhances knowledge and understanding of our heritage.
Organise and host a heritage themed event, officer attendance at other events	Moderate impact and cost, to promote our heritage and encourage benefits.
Establish and undertake a programme of conservation area review with management plans. This is a rolling programme for the 12 year duration of the strategy. The introduction of communities to assist with appraisals is recommended starting with a pilot scheme within the next 3 years.	High priority, statutory duty. Long term impact on protection of assets and recognised benefits for the community. Grant funding may be available to progress capacity building scheme further.
Monitor heritage assets at risk where possible, potentially including a Grade II survey involving communities in localised areas, starting with a pilot scheme within the next 3 years.	High priority. Long term impact on protection of assets. Some free training currently available through Historic England. Policy staff to facilitate.
Produce a policy document to guide communities on the process of submitting entries for a local list, including criteria for selection. Receive submissions from communities and historic groups to create a list of local assets.	Medium priority as not a statutory duty. Document completion low resource. Moderate input for staff to assess submitted lists initially, so phased starting with one area. Positive impact on planning process and benefits for local communities.
Provide further links and guidance on distinctiveness and design, including the sourcing of local materials.	Medium priority, moderate impact on renewal and new development. Low resource.
Increase attendance at partnership meetings. Work towards common goals, identify projects and sources of funding.	Medium priority, low cost/ minimal staff resources, potential high impact with any identified projects.
Create working group within the Council.	Medium priority, minimal staff resource. Potential high impact with identified / co-ordinated policies, projects and programmes.
Work with communities to facilitate or advise on a range of training opportunities in heritage, especially for neighbourhood planning groups and community groups with an interest in heritage.	Medium priority, minimal cost. Benefits for the community and potential long term impact on the protection of assets.

Table 2: Draft Heritage Strategy Plan indicating potential programme for 2018 - 2031

Objectives Theme A	Actions and tasks	Priority / Cost Impact	Financial Resources	Staff resources	Estimated time	2018-19	2019-22	2022 -25	2025-28 + 2028 - 31
Enhance understanding of heritage assets and their significance	<p>Provide information and guidance in the strategy and make this accessible to all.</p> <p>Produce a user friendly document, with printed copies distributed to local communities.</p> <p>Provide links to further guidance through the Council's website.</p>	High impact, moderate cost; much of this work completed	Printing and distribution of document	Policy staff, post room. Mostly completed	1 year overall, including consultation	Most tasks completed within this year, majority of work already completed		Review document	
Widen knowledge of the heritage of East Devon and its assets	Develop improved web pages for the exchange and provision of information on heritage issues relevant to East Devon	High priority, high impact, low cost	Website designer	Policy and conservation staff	Short term, with regular updates	Initiate this year	Regular updates	Regular updates	Regular updates
Celebrate and promote the heritage of East Devon (raise the profile)	<p>Promote strategy and web pages</p> <p>Host a heritage themed event / workshop for members and community representatives.</p> <p>Officer presence at other events</p>	Moderate input of staff and financial resources, medium priority and impact	Use of Council chambers, catering	<p>Policy and conservation staff, heritage champion and community officer</p> <p>Partner organisations have offered help</p>	Short term, possibly once a year	Initiate this year	Occasional event	Occasional event	Occasional event

Objectives Theme B	Actions and tasks	Priority / Cost Impact	Financial Resources	Staff resources	Estimated time	2018-19	2019-22	2022 -25	2025-28 + 2018 - 31
<p>Positively manage the heritage assets of East Devon:</p> <p>Undertake a programme of conservation area review</p>	<p>Develop a programme to prioritise reviews over 12 years.</p> <p>Conservation areas last subject to a full or interim review 2007 -2010. Not all areas will need a review.</p> <p>Start with areas within our historic towns then other areas within BUABs most subject to change.</p> <p>Priority to also be given to areas with active Neighbourhood Planning and historic interest groups.</p>	<p>High priority - statutory duty.</p> <p>Considerable input of staff and community but a long term activity and assistance from Historic England, especially if able to secure capacity building grant.</p>	<p>Facilitate community training and capacity building, help and /or grant is available from at least 2 organisations to help deliver programme.</p> <p>Roll out according to available resources.</p> <p>The capacity building programme has potential to reduce resources in the long term whilst achieving many benefits for the community.</p>	<p>Programme of priorities developed by conservation and policy staff.</p> <p>Programme managed by policy and technical staff, working with communities with some input and sign-off by conservation officers to suit available time.</p>	<p>Ongoing throughout duration of strategy, programme rolled out over 12 years</p>	<p>Develop programme of priorities to review areas with timescales, including those for full, interim or 'rapid' review.</p> <p>Consider areas suitable for a pilot scheme.</p> <p>Set up process for monitoring progress and impact.</p>	<p>Set up process for training community and carry out a pilot review working with community groups.</p> <p>Develop capacity building following pilot scheme</p> <p>Carry out any other reviews as set out in programme</p> <p>Adoption of Lympstone extension</p>	<p>Ongoing reviews</p> <p>For each 3 year period aim for average of 3 reviews per year, including community assisted appraisals</p> <p>This gives a total of 36 reviews over 12 years but potential for more reviews depending on success of capacity building and availability of grant funding.</p>	<p>Ongoing reviews</p> <p>Average of 3 reviews per year including community assisted appraisals</p>
	<p>Prepare bespoke methods of reviewing different types of conservation area, for example a rapid review for some conservation areas without BUABs to minimise time taken.</p> <p>Set up process for communities to help deliver reviews through a pilot scheme.</p> <p>Prepare appraisals, reviews and management plans.</p> <p>Designate new areas where boundary change needed including consultation</p>	<p>Include rapid review and previous work as well as bespoke methods to minimise programme and resources</p> <p>Recognised benefits for the community</p> <p>Long term impact on protection of assets</p>							

Objectives Theme B	Actions and tasks	Priority / Cost Impact	Financial Resources	Staff resources	Estimated time	2018-19	2019-22	2022 -25	2025-28 + 2018 - 31
	Provide information and a link to Historic England heritage assets at risk on the Council webpage.	Statutory duty, high priority. Will help with monitoring assets at risk	none	Policy or conservation staff	Minimal input with occasional updates	Add link to Council webpage	Occasional updates	Occasional updates	Occasional updates
Monitor Heritage Assets at Risk	<p>Monitor heritage assets at risk where possible, including a survey of Grade II assets in selected conservation areas. Develop a programme, with priorities.</p> <p>The programme can start with a training facility which has been set up by Historic England, potentially starting in the eastern part of the District not surveyed previously. A pilot scheme involving the community could be set up for a conservation area where there is an active neighbourhood planning / historic interest group, and linked to the pilot conservation area appraisal.</p>	<p>High priority through the NPPF.</p> <p>Awareness of assets at risk can help focus action and inform programmes.</p> <p>Recognised benefits for the community</p> <p>Potential for long term impact on protection of assets</p>	<p>Current Grade II training material available on line through Historic England.</p> <p>Also some localised projects with training for monitoring other grades / scheduled monuments, in partnership with HE and the AONBs</p>	<p>Policy staff to facilitate, some input from Historic England and conservation team (on priorities).</p> <p>Potential grant from Historic England through the capacity building programme</p>	<p>Main contribution from local community, with training initially.</p> <p>Trained groups to take projects forward in longer term</p>	<p>Develop programme of priorities.</p> <p>Establish processes to facilitate training and process data.</p> <p>Consider a suitable pilot scheme</p>	<p>Run pilot scheme, monitor full range of criteria on input, output, outcomes and impact to measure success and inform future schemes.</p>	<p>Roll out programme depending on success and within available resources</p>	<p>Continue programme within available resources</p>
Establish a local list of non-designated assets	<p>Produce a draft policy document advising communities on procedures for a Local List, with guidance on selection criteria, for public consultation.</p> <p>Receive submissions from communities and historic groups.</p> <p>Develop a programme starting with specific areas to be manageable for staff.</p>	<p>Medium priority as not a statutory duty. However positive impact on planning process and benefits for local communities</p>		<p>Policy staff, input from conservation team</p> <p>Much of the work by community prior to submission of entries.</p>	<p>Considerable input to set up list but less time needed for annual maintenance</p>	<p>Public consultation on the Local List guide.</p> <p>Set up process and pilot for first areas.</p>	<p>Roll out to other areas along with available staff resources</p>	<p>Roll out programme if needed and maintain list</p>	<p>Roll out programme if needed and maintain list</p>
Encourage development which enhances distinctiveness	<p>Provide further guidance which address the most common issues, much from Historic England.</p> <p>Provide information on the sourcing of local materials.</p>	<p>Medium priority, moderate impact on renewal and new development.</p>		<p>Conservation and policy staff</p>	<p>Short term staff input with occasional review</p>				

Objectives Theme C	Action and tasks	Priority / notes	Financial resources	Staff resources	Estimated time	2018-19	2019-22	2022 -25	2025-28 and 2018 - 31
Promote a better understanding of the value of heritage	Provide information through the strategy and website.	Medium priority		Policy and conservation staff	Moderate, short term, with occasional updates	Ongoing, updates	Ongoing, updates	Ongoing, updates	Ongoing, updates
Work with partners and corporately to identify joint projects and maximise funding	Increase attendance at partnership meetings to work towards common goals	Medium priority, potential high impact with identified projects	Pool any resources with partners for maximum benefit	Policy staff	Regular meetings	Regular meetings	Regular meetings	Regular meetings	Regular meetings
	Create Council working group to work towards joint objectives and co-ordinate projects and programmes. Provide website links to regeneration, economy and tourism sectors.	Medium priority, potential high impact with identified projects and programmes		Environmental health, economic development conservation and policy staff.	Regular meetings to suit staff availability	Regular meetings	Regular meetings	Regular meetings	Regular meetings
	Work with others to identify projects and sources of funding	Medium	Potential to attract grant aid	Policy staff	Moderate, depending on success of project	Ongoing depending on project	Ongoing depending on project	Ongoing depending on project	Ongoing depending on project
Work with communities	Facilitate, or advise on, a range of training opportunities especially for neighbourhood planning / community groups with an interest in heritage	Medium	Included in theme B training	Policy staff	Included in theme B training	Ongoing	Ongoing	Ongoing	Ongoing
	Produce a template to guide neighbourhood planning groups in site assessments in relation to heritage	Medium		Policy staff	Minimal, short term				

East Devon Heritage Strategy 2018 – 2031

Consultation Draft



East Devon – an outstanding place

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Cover image:

Fairlynch Museum, Budleigh Salterton, example of a 'Cottage Orné building.

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Executive Summary

This draft of the first heritage strategy for East Devon is provided for the purpose of public consultation. The document presents a summary of our heritage, its significance and its benefits whilst developing objectives for the future, with a broad action plan for the delivery of our recommendations. The strategy runs from 2018 – 2031 to co-ordinate with the local plan.

The strategy focuses on the heritage assets of the district where the Council has a direct role and responsibility, or influence, in the decision making or management process. However broader designations that inform the strategy are also considered, including the two Areas of Outstanding Natural Beauty, which have a positive influence on the enhancement and management of the district's heritage.

The first section sets out the purpose of the strategy, with information on the role of the Council and other organisations, sources of information and a background of legislation and policy.

The strategy for the future of our heritage is met through a range of aims and objectives which are explored in section 2 through three themes. For each theme, objectives for the future are raised and actions to meet those objectives are recommended:

- Theme A describes our historic environment and provides information on its designated and undesignated heritage assets and their significance.
- Theme B sets out current policies and programmes relating to development management, conservation areas and heritage assets at risk.
- Theme C looks at the value of our heritage as a part of sustainable development, and the social, economic and environmental benefits it provides for East Devon. The impact and influence of other policies are considered as well as how we work with our communities and partners.

The recommended actions raised in Section 2 are presented in the third section on implementation. This includes a broad action plan for the strategy, to be developed in more detail following consultation on this document. A summary of the resources needed and benefits of delivering the strategy are also outlined.

A brief description of our historic town centres and conservation areas are provided in Appendices 1 and 2.

Section 1: Introduction and Background



Mouth of the River Otter at Budleigh Salterton and World Heritage Site coastline

Introduction

- 1.1. Welcome to the first heritage strategy for the district of East Devon, a place with a rich historic environment and an abundance of heritage assets, valued by its residents and visitors alike. It is a strategy that brings together information on our heritage and identifies challenges and opportunities for the future. The strategy seeks to involve the community and develop partnerships to make the most of the benefits that heritage can bring. Most importantly, this is an opportunity to celebrate the outstanding heritage East Devon has to offer.

What is heritage?

- 1.2. The term heritage embraces history in all its forms, from buildings, spaces, art, artefacts and archaeological sites to natural heritage such as landscape, flora and fauna and cultural heritage including place names, customs and traditions. The strategy will touch on many of these aspects but will focus on the role of the Council and how we can better work with partners and communities in the future, especially in respect of our built heritage.

The heritage of East Devon

- 1.3. The character of East Devon has evolved as a unique combination of these historical influences. It is a predominantly rural area, with attractive market towns, picturesque villages and part of a World Heritage Site coastline to the south, with fine seaside resorts. We are fortunate in the district to have nearly 4500 individual assets of significant architectural and historic importance that have been listed nationally, including buildings, monuments and parks and gardens. In addition to these we have a wealth of assets of more local interest which also add richness to the landscape.
- 1.4. East Devon's exceptional natural landscape is reflected in the designation of two Areas of Outstanding Natural Beauty which cover around two thirds of the district. The diversity of the district's landscape and its underlying geology can be seen from the Exe estuary in the west through to the 'Jurassic Coast' in the south, the Blackdown Hills to the North and the Dorset and Somerset borders in the East.
- 1.5. There is also a noticeable change in the character of our settlements, from the Victorian and Edwardian seaside resorts of the south coast, to the Saxon and Roman influenced market towns of the central area and medieval farmstead groupings scattered throughout the district.
- 1.6. Historic buildings of considerable architectural merit are apparent in our towns and villages, telling a story of our social, agrarian and industrial legacy, whilst distinctive local building materials such as chert, cob and thatch retain a rural feel. The district is also notable for its archaeology, with a range of scheduled monuments including the remains of Iron Age hill forts and Roman forts, medieval castles and a wide scattering of Bronze Age burial sites.

Why have a heritage strategy for East Devon?

- 1.7. The National Planning Policy Framework¹ states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk though neglect, decay or other threats. Our heritage assets, which are valued parts of the historic environment, are an irreplaceable resource that provide significant environmental, social and economic benefits for East Devon.
- 1.8. Positive conservation helps to preserve the assets themselves, but can also contribute to the local economy, both directly, through the employment of specialised craftsmen and use of local materials, and indirectly through increased appeal for tourists, businesses and residents. Town centres can have enhanced appeal and identity due of their historic past, which conservation and sensitive regeneration can help to maintain.
- 1.9. An understanding and appreciation of our heritage can encourage a feeling of identity, pride and belonging to residents, whilst heritage assets often play a central role in building local distinctiveness. A community's sense of place and the quality of our lives, including health and wellbeing, can be enhanced through their contribution to the local environment, culture, education and leisure.
- 1.10. The East Devon Local Plan sets out its commitments, strategies and policies for the District's heritage. The heritage strategy for East Devon provides more detail and will help to ensure that our historic environment and heritage assets are protected, maintained and enhanced to the advantage of future generations.

What does the strategy cover?

- 1.11. The strategy presents a central reference point for the historic environment of the East Devon district, providing information on its historic assets and a framework for the delivery of the Council's recommendations.
- 1.12. Whilst all historic influences on the character of East Devon inform the strategy, the focus is directed towards our more tangible heritage assets, where the Council has a direct role and responsibility, or influence, in the decision making or management process. A heritage asset is defined as:²

Heritage Asset

"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)."

¹ DCLG (2018) National Planning Policy Framework, para 185

² DCLG (2018) National Planning Policy Framework, Annexe 2: Glossary

1.13. The overall strategy for the future of our heritage can be met through a range of aims and objectives. These are addressed in Section 2 through the three themes of:

- Understanding and appreciating our historic environment
- Positively managing our historic environment and
- Enhancing and benefitting from our heritage

1.14. The themes describe and analyse the district's assets and the Council's policies, programmes and management processes whilst identifying issues and opportunities for improvement. The objectives raised from each are developed into our plan of future actions. Each theme is followed by a summary of these objectives and the tasks recommended for action.

An action plan is presented in Section 3, with information drawn from the three themes. Changes to public sector funding in recent years has meant limited resources within East Devon District Council both to manage our assets and to develop opportunities to benefit from our heritage.

1.15. Recommendations are therefore prioritised to ensure that resources are managed according to our statutory duties, agreed policies and to their best advantage. Opportunities for cost effective solutions are also sought, including collaboration with existing and new partners and the potential for securing new sources of funding.

1.16. The Localism Act (2011) introduced Neighbourhood Planning to Local Authorities, bringing new approaches and giving greater powers and opportunities for local communities to become involved in appraising and managing their local heritage. East Devon District Council has embraced neighbourhood planning including policies relating to their local heritage, at the time of writing with 40 plans either legally made or in production.

1.17. East Devon also has the advantage of many local historic interest groups and individuals living in the district with knowledge of our heritage assets. The Council is committed to working with communities, parish councils and neighbourhood planning groups to understand, enhance and positively manage our heritage. In this strategy we recommend and welcome the active participation and further involvement of our local communities.

1.18. Broader designations that inform the strategy are also considered, especially the two Areas of Outstanding Natural Beauty; whilst these are not heritage assets as such, they are important parts of the landscape, home to heritage assets and may form part of their setting. Others such as National Trust sites, Special Areas of Conservation and Sites of Special Scientific Interest are also mapped. These designations can have a positive influence on the enhancement and management of the District's heritage, which partnerships between organisations can help to maintain.

1.19. The strategy is not presented as an exhaustive description or analysis of our heritage but to provide examples of a range of our assets, whilst details of information on resources are provided for further investigation.

How has the strategy been prepared?

- 1.20. The consultation draft of the strategy has been developed within the Council, engaging with our Heritage Champion and specialist organisations such as Historic England, the East Devon and Blackdown Hills AONBs and Devon County Council Historic Environment Team.
- 1.21. This stage of consultation will also engage with local communities, interested individuals and local historic organisations to ensure we have addressed the most relevant issues

Purpose of the strategy

- 1.22. This overall aim of this document is to set out a positive strategy for the conservation and enjoyment of the historic environment, in accordance with local and national policy. In more detail, it aims to:

- *Widen the knowledge and understanding of East Devon heritage by bringing together information and making it publically accessible*
- *Identify the heritage issues, challenges and opportunities for East Devon and recommend actions for the future*
- *Involve the community and develop partnerships to make the most of the social, economic and environmental benefits that heritage can bring*
- *Support the East Devon Local Plan, setting out our policies and the overall approach of the Council*
- *Celebrate the outstanding heritage that East Devon has to offer by promoting its assets and presenting a vision for the future*

The role of East Devon District Council and other organisations

- 1.23. There are many organisations, including local authorities, national and regional public bodies, local societies and historic groups engaged in the planning and management of the historic environment, the roles of some of which are outlined below. Many have accessible information resources and details of these are provided.

Key organisations and sources of information

East Devon District Council

- 1.24. The Council has a Conservation Team, which carry out a range of statutory and non-statutory duties. Statutory duties for Local Authorities include the designation, review and management of Conservation Areas, determining listed building consent, advising on unauthorised works and maintaining a 'Buildings at Risk' register.
- 1.25. The Council also has a responsibility under the National Planning Policy Framework NPPF (revised 2018) to maintain or have access to Historic Environment Records containing up-to-date evidence about the historic environment. It does through a partnership with Devon County Council's Historic Environment Team which also provides specialist advice on archaeology within the district. East Devon District Council is also responsible for implementing the NPPF in terms of planning decisions affecting designated and non-designated heritage assets.
- 1.26. Non-statutory duties in the conservation of the historic environment relate mainly to policy, guidance and advice, which are also touched on in Theme B, 'positively managing our historic environment.'
- 1.27. The Council has a Building Design and Heritage Champion, a local councillor whose role is to promote all aspects of the historic environment in East Devon. The role can include³:
- generating enthusiasm for and awareness of the importance of the local historic environment
 - helping to ensure that commitment to the proper care of the historic environment is embedded in all relevant activities and plans of the local authority, and
 - Influencing and communicating with others to ensure benefits for the historic environment.

³ Historic England (2018) 'What is a Heritage Champion' webpage extract, summarised

Historic England⁴

- 1.28. The role of this public body is to advise government on the designation of Listed Buildings, Scheduled Monuments, Registered Parks, Gardens and Battlefields and Protected Wreck Sites identified by them or put forward by individual request, and managing the list of designated assets. They primarily provide advice on Grade I, and Grade II* assets and deal with Scheduled Monument consents. Information is available on designated assets in East Devon including those categorized as 'at risk'.
- 1.29. The organisation also carries out extensive research and monitoring of our heritage assets and their value, and provides information on funding and a comprehensive range of guides through their website. 'Heritage Counts' is an annual audit of England's Heritage, monitoring 'heritage indicators' for each region with information collected by the Historic Environment Forum and reported on by Historic England.
- 1.30. In April 2015, when the organisation changed its common name from English Heritage to Historic England, the charity officially called the English heritage Trust took the name of English Heritage.

English Heritage

- 1.31. The English Heritage Trust is a company and a registered charity that manages over 400 of England's historic sites, including Blackbury Camp in East Devon, and also provides information on England's history through the ages.

Devon County Council Historic Environment Team⁵

- 1.32. The County Council also carries out a range of research and projects specific to this area. Of particular interest is the database of Historic Environment Records (HERS) it maintains, which provides information on archaeological sites, historic buildings, historic landscapes and other heritage features, including designated and locally listed assets.
- 1.33. Data includes historic tithe maps, aerial photos from the 1940's (World War II), photographs and other published material, available to view in person or online. Reports and studies are available, for example, on 'landscape character mapping' which can reveal human activities of agricultural and industrial practices through the ages.
- 1.34. More recently, a technique called lidar (light detection and ranging), provides airborne remote sensed data to discover what can't be seen below the ground or tree coverage, uncovering a wealth of evidence on the history of East Devon.
- 1.35. For example, a current project (2016-18) is centred mainly on the distinctive landscape of the Blackdown Hills where lidar will be used along with aerial photos and other sources, to provide archaeological information. National Mapping Programme⁶ surveys enhance our local Historic Environment Records in order to inform land management, conservation and research.

⁴ <https://historicengland.org.uk/>

⁵ <https://new.devon.gov.uk/historicenvironment/>

⁶ Grant funded by Historic England and undertaken by Devon CC and AC Archaeology

National Archives

- 1.36. The National Archives has information on records including that of land ownership, religious houses, royal grants and agricultural practices. Manorial documents are now collected, some of which are available to view online.

South West Heritage Trust

- 1.37. This Trust includes the resource Devon Heritage Centre which holds a large collection of records and published works relating to Devon's history including historic maps, illustrations, estate and manorial records.

National Trust

- 1.38. The National Trust (for Places of Historic Interest or Natural Beauty) is a large charity in England, Wales and Northern Ireland. The Trust aims to preserve and protect the heritage of the many historic houses and gardens it owns and has thousands of volunteers that help to care for these places. Information is available on a wide range of heritage issues.

East Devon AONB⁷ and Blackdown Hills AONB⁸

- 1.39. The Areas of Outstanding Natural Beauty are managed by partnerships which include national agencies, local authorities, land owners, conservation organisations and community groups. Both partnerships provide much information and advice on the environment and heritage of their area as well as support for community projects.

Local History Organisations

- 1.40. There are many local historic societies and associations providing more detailed information on the historic environment in their area, which are listed in Appendix 3.



Colyton Parish History Society: Heraldic Banners Project and Heritage Centre

⁷ <http://www.eastdevonaonb.org.uk/>

⁸ <https://blackdownhillsaonb.org.uk/>

Background Legislation and Policy

Government Policy and Guidance

- 1.41. The government sets out its objectives relating to the historic environment and heritage assets through the National Planning Policy Framework. Consideration of the historic environment and its heritage assets is a principal objective of sustainable development, which may be achieved through the three broad social, economic and environmental roles, which are mutually dependent.
- 1.42. The National Framework states that plans “should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats⁹”. This strategy should take into account:
- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
 - b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - c) the desirability of new development making a positive contribution to local character and distinctiveness; and
 - d) opportunities to draw on the contribution made by the historic environment to the character of a place
- 1.43. National Planning Policy Guidance¹⁰ advises Local Planning Authorities to identify specific opportunities within their area for the conservation and enhancement of heritage assets, which may require the development of specific policies, and that they should “consider the relationship and impact of other policies on the delivery of the strategy for conservation”.

Legislative Framework

- 1.44. In addition to the Town and Country Planning Act 1990, the Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest, and the Ancient Monuments and Archaeological Areas Act 1979 provides specific protection for scheduled monuments.
- 1.45. The Localism Act 2011 introduced Neighbourhood Planning which gives people greater power to influence development within their local area and to consider the impact of proposals upon heritage assets.

⁹ DCLG (2018), National Planning Policy Framework, paragraph 185

¹⁰ DCLG (2014), National Planning Practice Guidance, last updated February 2018

East Devon District Council Policy

1.46. East Devon Local Plan, in paragraph 18.61, states that:

“We will adopt a positive, proactive strategy for the conservation and enjoyment of the historic environment taking into account the variations in type and distribution of heritage asset, as well as the contribution made by the historic environment by virtue of:

- Its influence on the character of the environment and an area's sense of place.
- It's potential to be a catalyst for regeneration in an area, in particular through leisure, tourism and economic development.
- The stimulus it can provide to inspire new development of imaginative and high quality design.
- The re-use of existing fabric, minimising waste.
- Its mixed and flexible patterns of land use that are likely to be, and remain sustainable.”

East Devon District Council Local Plan:

Strategy 48 - Local Distinctiveness in the Built Environment

“Local distinctiveness and the importance of local design standards in the development process will be of critical importance to ensure that East Devon's towns and villages retain their intrinsic physical built qualities. Where towns or villages are or have been despoiled we will seek to have qualities reinstated through good design. Use of local materials and local forms and styles will be essential to this distinctiveness.

We will work with our partners and local communities to produce Design Statements to guide new development and ensure its appropriateness”.

Strategy 49 – The Historic Environment

“The physical and cultural heritage of the district, including archaeological assets and historic landscape character, will be conserved and enhanced and the contribution that historic places make to the economic and social well-being of the population will be recognised, evaluated and promoted. We will work with our partners and local communities to produce or update conservation area appraisals and conservation area management plans”.

Section 2: Heritage Themes



Salcombe Regis

Theme A: Understanding and appreciating our historic environment

- 2.1. Our landscape has a sometimes complex pattern of fields, hedges, woodlands, farms and other buildings, roads, lanes and settlements which all form a part of the historic environment, created over many thousands of years by human activity. It is important to both understand and appreciate this environment and the heritage assets within it so that they can be conserved and enhanced for future generations to enjoy. The historic environment is defined by the government as:¹¹

Historic Environment

“All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora”

- 2.2. Two objectives of this chapter are to widen the knowledge of the historic environment of East Devon and to improve the understanding of our heritage assets and their significance.

Proposed Action:

Provide information and guidance in the strategy and make this accessible to all

- 2.3. Our district has a unique historic environment and range of heritage assets, which can be understood better by looking at what has gone before. Throughout the district there is much evidence of human occupation from the past in the present, from its Stone Age hand axes and camps, Bronze Age Barrows and Iron Age hill forts to Saxon settlements and Roman roads, from medieval places of worship to Georgian, Victorian and Edwardian residences, from factories of the industrial revolution to World War II airfields, to name just a few.
- 2.4. In rural areas the history of both farming and extractive industries are evident in the vast number of marl pits used for improving soil, clay pits used for pottery industries, and in the distinctive medieval strip fields which may be glimpsed in places, beyond the high ‘Devon’ banks and hedgerows defining many of our country lanes.
- 2.5. The district contains much evidence of the Roman conquest in its army camps and forts, and later some villas or highly Romanised farmsteads and enclosed settlements. Parts of the Imperial road system still survive, including what was the Dorchester to Exeter Road and ‘Fosse Way.’

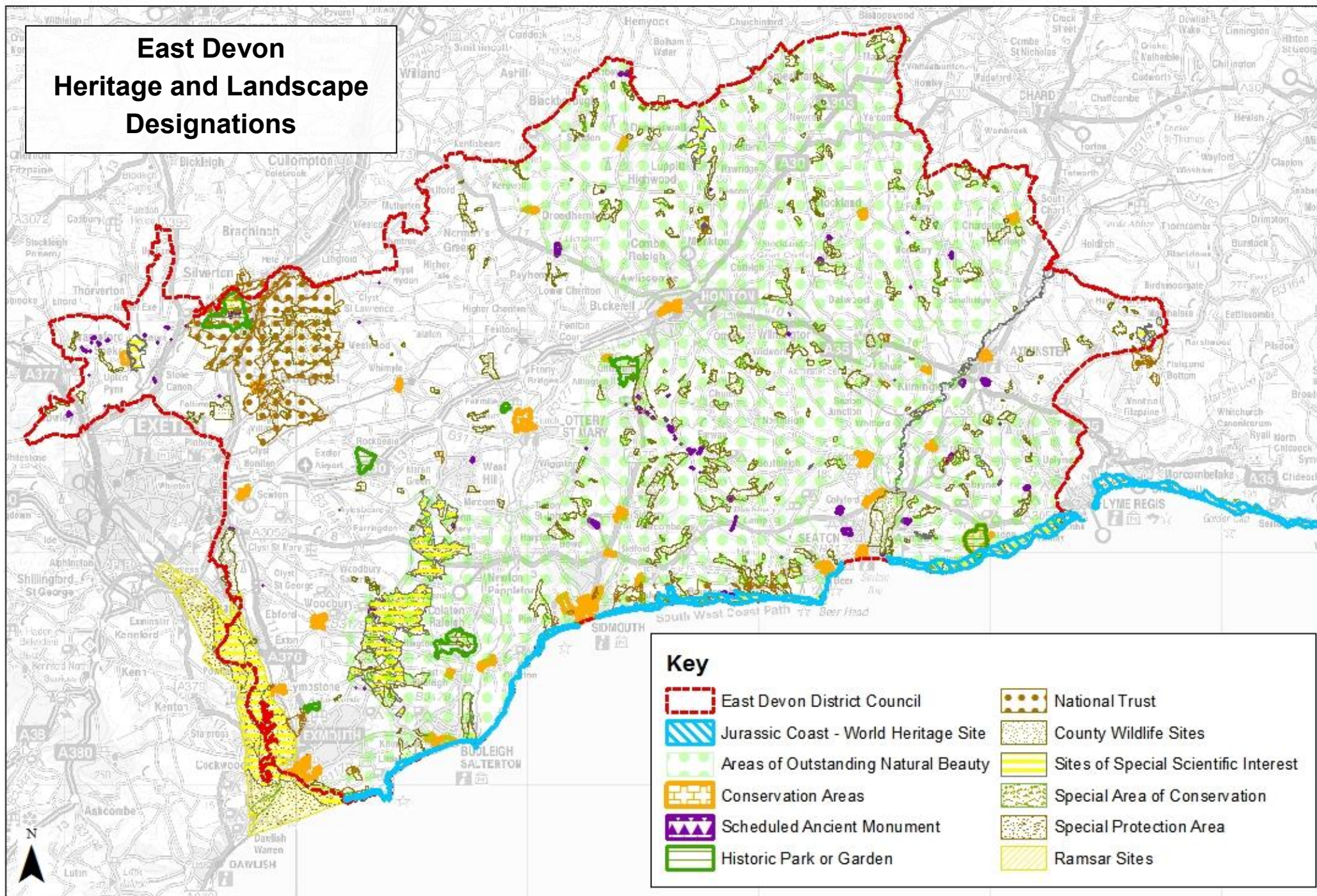
¹¹ DCLG (2018) National Planning Policy Framework, Annexe 2: Glossary

- 2.6. East Devon has a rich heritage of urban centres, varying greatly in nature and character. The Saxon origins of Ottery St Mary can be seen in the characteristic 'star' shaped pattern of its central routes, whilst this and the other market towns of Honiton and Axminster were centres of the textile industry from medieval times. Honiton is a classic example of a planned town by the local lord, whilst Axminster originated as a Roman roadside small town.
- 2.7. Farmstead groupings are also an important local feature, especially those of medieval origin or planned as a part of land estates, including those seen at Broadclyst, Gittisham and Broadhembury, whilst some fine manor houses and ecclesiastical residences remain, such as the Bishop's Court at Clyst St Mary.
- 2.8. The quarrying of stone, such as that at Beer, and pottery making were other important industries at this time and local building materials and traditions including cob and thatch all contribute to distinctive local styles.
- 2.9. Many of East Devon's villages were in existence by the 10th and 11th centuries, and were often centred around a parish church. The main religion for more than 1500 years has been Christianity and these churches form some of the most visible parts of its heritage, whilst the remains of an Abbey have survived at both Dunkeswell and at Axminster (Newenham Abbey).
- 2.10. The Regency town of Sidmouth and other seaside resorts at Exmouth, Budleigh Salterton and Seaton all tell a story of their history through time, expanding with the development of railways. Good examples of the 'Cottage Orne' picturesque rustic buildings and later, fine Victorian terraces, Edwardian architecture and the Arts and Crafts style all contribute to distinctive town landscapes.
- 2.11. Meanwhile, villages along the coast retain a local character that has been largely unspoilt by the expansion of tourism. The Second World War has also left many traces including pill boxes, radar stations and airfields.



Second World War remains of military building at Beer Head; Dunkeswell Airfield and Heritage Centre

East Devon Heritage and Landscape Designations



Heritage assets and their significance

- 2.12. Historic England describes how “Some parts of the historic environment are important to society as a whole or to a group within it and merit some level of protection or consideration”¹² which are our heritage assets that future generations are likely to value too, for the same or similar reasons.
- 2.13. The term significance is used to describe, in listing of a building “The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”¹³
- 2.14. Significance is the sum of an asset’s heritage value, the value being assessed through Evidential Value, Historic Value, Aesthetic Value and Communal Value.¹⁴
- 2.15. Designation of an asset recognises the value(s) of its significance and gives it protection by law or policy for its management and enjoyment, now and in the future. The setting of an asset, when it makes a contribution to the significance of the asset, although not designated, may also be offered a degree of protection.
- 2.16. Designated heritage assets may be Listed Buildings, Scheduled Monuments, Conservation Areas, Registered Parks Gardens and Battlefields and Protected Wreck Sites.

Nationally designated assets in East Devon

- 2.17. The most important heritage assets are formally recognised at a national level for their importance. In 2017, East Devon had 3,082 listed assets, comprising nearly 4,500 individual buildings and structures (an asset may contain more than one individual building or structure), 8 designated parks and gardens and 112 scheduled monuments that are formally listed by Historic England.

		Grade1	Grade II*	Grade II
Listed Buildings	3082	54	184	2,844
Scheduled Monuments	112			
Registered Parks and Gardens	8	1	1	6
World Heritage Site	1			
Conservation Areas	34			

Table 1: Designated Assets of East Devon District, November 2017

- 2.18. The number of listed buildings changes over time and up to date information can be viewed through the Historic England website.¹⁵ The District also has a World Heritage Site inscribed by UNESCO¹⁶ and 34 Conservation Areas that have been designated by East Devon District Council.

¹² Historic England webpage (2018) Heritage Conservation Defined

¹³ NPPF glossary (draft revised version April 2018)

¹⁴ For a full explanation see Historic England (2008) Conservation, Principles Policy and Guidance

¹⁵ <https://historicengland.org.uk/listing/the-list/data-downloads/>

¹⁶ United Nations Educational, Scientific and Cultural Organisation

The Conservation Areas of East Devon

- 2.19. Conservation Areas are one of the fundamental heritage assets, which are areas defined on account of the value and worth of the features they contain. Designation helps to improve our understanding of an area's heritage and define what it is about the character or appearance that makes it special, and what should be preserved or enhanced. Legislation states that:¹⁷

Local Authorities have a duty to “from time to time determine which parts of their area are areas of special architectural or historic interest, the character of which it is desirable to preserve or enhance”, and to designate those areas as Conservation Areas.

- 2.20. When considering which areas should be designated, the Council looks at the quality and interest of an area as a whole as well as individual buildings and landscapes. A 'character appraisal' identifies the most significant aspects of the landscape, architecture and historical importance in our conservation areas.
- 2.21. Conservation Area appraisals also make an assessment of positive and negative features, and identify opportunities for improvement. For each settlement, our appraisals look at features including:
- The history of the buildings
 - Topography and landscape setting
 - Settlement form
 - Important views and vistas
 - Locally distinctive features and vernacular building styles
 - Past and present activities and uses
 - Streetscape and the public realm
 - Green spaces and trees
- 2.22. Of the 7,000 (approximately) Conservation Areas in England, 34 have been designated in East Devon. They vary considerably in size and character, and cover parts of the main towns of Exmouth, Sidmouth, Seaton and Honiton, as well as the historic cores of smaller settlements such as Ottery St Mary and Budleigh Salterton.
- 2.23. Twenty Conservation Areas are within villages, mainly in rural areas and nine of these are totally within an AONB. Four Conservation Areas are adjacent to the Jurassic Coast World Heritage Site - at Seaton, Beer, Budleigh Salterton and Combyne Rousdon.
- 2.24. The District's Conservation Areas present a mix of forms, such as those with buildings arranged around a centre, appearing in a line, or more widely scattered, with many containing individual, groups and clusters of buildings listed in their own right as being of special architectural and historic interest.

¹⁷ Planning (Listed Buildings and Conservation Areas) Act 1990

- 2.25. The character of the East Devon's Conservation Areas varies considerably, from the Victorian and Edwardian terraces and villas of our seaside towns in Exmouth, Budleigh Salterton, Sidmouth and Seaton, to those centred on medieval farmsteads of the Blackdown Hills, or workers cottages such as those in Gittisham. In the market towns of Ottery St Mary and Honiton a legacy of Saxon, Roman and planned medieval street patterns can be seen.
- 2.26. Conservation Areas vary in size from 3.46 hectares in Kilminster to 85 hectares at Compyne Rousdon (which is also a registered park). Ottery St Mary and Compyne Rousdon have large areas of landscape or garden. The Conservation Area with the largest built up area is in Budleigh Salterton comprising 30.27 hectares, whilst Sidmouth Town Centre Conservation Area occupies a similar area of 28.91 hectares. Conservation Areas in East Devon combine to make a total of approximately 518 hectares.

A brief summary of each Conservation Area is provided in Appendix 2

- 2.27. **Of the smaller villages:** eleven Conservation Areas are a part of the villages of Brampford Speke, Broadhembury, Chardstock, Colyford, Gittisham, Kilminster, Musbury, Salcombe Regis, Sowton and Stockland, often covering a large part or most of the village. Six of these are entirely within and AONB whilst two are partly in or adjacent to an AONB (see Appendix 2).
- 2.28. **Of the larger villages:** there are nine Conservation Areas within the villages of Beer, Broadclyst, Colyton, East Budleigh, Lymington, Otterton, Sidbury, Whimble and Woodbury and are often located around the centre of the village. Three are entirely within an AONB (see appendix 2) whilst Broadclyst conservation area is partly within and surrounded by National Trust property.



Gittisham village: example of workers cottages and map showing extent of the Conservation Area (yellow) and Listed Buildings (pink).



Distinctive cottages in the villages of Sidbury, Broadclyst and Broadhembury

Towns

- 2.29. There is a concentration of five Conservation Areas in Sidmouth including the town centre, Elysian Fields, Bickwell Valley, Sid Vale and Sidford, and three in Exmouth at Albion Street, Bicton Street and Louisa Terrace. There is one Conservation Area in Axminster, Budleigh Salterton, Honiton and Seaton, and a town centre and extended area in Ottery St Mary making up the remainder in East Devon towns.
- 2.30. Five Conservation Areas in Axminster, Budleigh Salterton, Honiton, Ottery St Mary and Sidmouth incorporate the historic town centre. These are described in more detail in Appendix 1.



Seaton: 19th Century 3 storey stucco villas in blocks of 4



Budleigh Salterton: late 19th Century housing with shutters characteristic of the area, and Exmouth: continuous terrace of late 18th and early 19th century properties

The Listed Buildings of East Devon

- 2.31. Listed Buildings are considered to be the best examples of buildings of heritage importance. Most, but not all, Listed Buildings are old and largely or wholly retain their original built fabric and features. If a building is deemed¹⁸ to be of special architectural or historic interest, it is considered to be of national importance and therefore worth protecting and is included in the list of buildings administered by Historic England.

- 2.32. There are 3 grades of listed building:

Grade I buildings

These are of exceptional interest, sometimes considered to be internationally important.

Grade II* buildings

These are particularly important buildings of more than special interest.

Grade II buildings

These are nationally important and of special interest. It is the most likely grade of listing for a private residential building and over 90% of buildings are in this grade.



Examples of Grade I (St Mary's Parish Church) and Grade II* (The Priory) Listed Buildings in Ottery St Mary

¹⁸ by the Secretary of State (for Culture, Media and Sport)

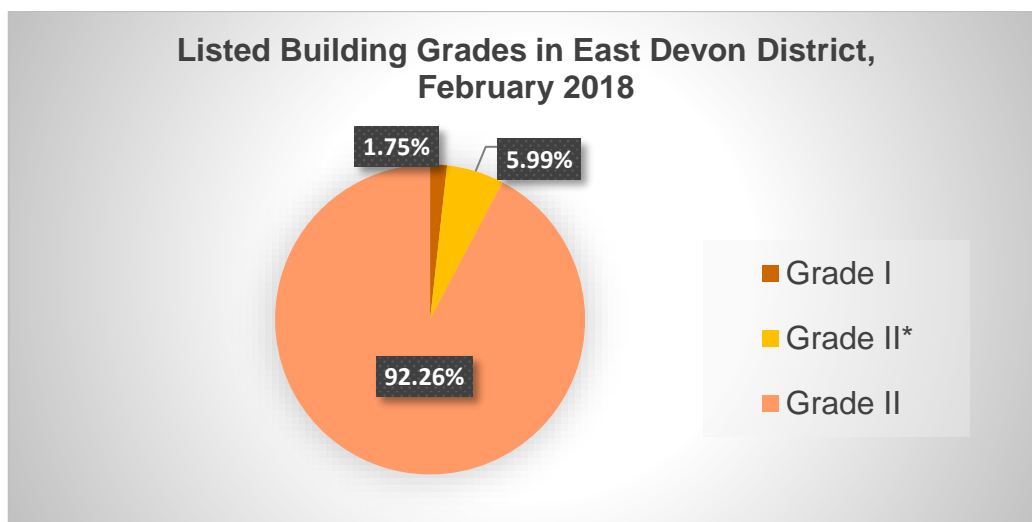


Table 2: Grades of Listed Building entries¹⁹ in East Devon

- 2.33. The proportions of Grades I, II* and II are broadly representative of England as a whole, but with a slightly lower percentage of Grade I buildings.

The Parks and Gardens of East Devon

- 2.34. Formal parks and gardens and 'naturalistic created landscapes', were often provided alongside built features, especially grand country houses, though in some cases they may have been built as standalone features or integrated into a wider built fabric. In many cases these parks and gardens were also planted with significant collections of plants and trees and may contain built features within them such as summer houses or grottos that are of heritage importance in their own right.



Killerton Park and house, and Bear's Hut (originally a summerhouse built in 1808)

¹⁹ A listed building entry may cover a number of individual units. Up-to-date information can be viewed at <https://historicengland.org.uk/listing/the-list/data-downloads/>

- 2.35. Given their heritage importance Historic England maintains a Register of Parks and Gardens of special historic interest in England, of which 8 are currently listed in East Devon:

Bicton: Grade I
Killerton House: Grade II*
Rockbeare Manor: Grade II
A La Ronde and the Point-In-View: Grade II
Combe House: Grade II
Rousdon: Grade II
Connaught Gardens: Grade II
Cadhay Park: Grade II

Example: Connaught Gardens

- 2.36. This is an interesting example of a Registered Park. Adjacent to Sidmouth town centre and the sea front. The park lies partly within the World Heritage site and an extensive view of the Jurassic coast can be observed from this vantage point. The western side includes part of the AONB and a Grade II listed building, whilst the eastern side is within a Conservation Area. Adjacent to the park to the west is a County Wildlife Site and to the south a Site of Special Scientific Interest. The park is a meeting place for the community through its open air cafe and theatre, a greenhouse and many seating areas.



Connaught Gardens Registered Park, Sidmouth

Archaeological heritage

- 2.37. The District contains sites and finds dating from the oldest periods of occupation in Britain by humans and their predecessors. Human activity in East Devon became frequent from 250,000 BC and has left its mark in, for example, hand axes and other tools from the Lower Palaeolithic (Old Stone Age) found in the Axminster area.
- 2.38. From the 4th Millenium BC (during the New Stone Age) the construction of monuments began, including the causewayed enclosure at Hembury, now a part of the landscape along with our Bronze Age barrows and Iron Age hillforts. These provide a link with our historic and prehistoric past giving an insight to the lives of our ancestors. Most of the landscape we can see today dates from the medieval and post-medieval enclosure of the landscape.
- 2.39. Archaeological sites not only represent our heritage but can contribute to our sense of place. However this legacy is subject to a growing range of pressures, both by humans and natural processes such as erosion.

The Scheduled Monuments of East Devon

- 2.40. The most important archaeological remains are formally recorded as Scheduled Monuments.²⁰ Monuments are 'scheduled' as a selection of nationally important archaeological sites. Historic England carries out a programme of scheduling work but anyone can make a nomination to Historic England who manage the schedule.
- 2.41. In 2018, East Devon has 112 Scheduled Monuments, notably its prehistoric Bronze Age bowl barrows and Iron Age hill forts. It has a diverse range including 6 'castles', 6 forts, 2 abbeys, 6 bridges, 8 crosses, a holy well, a prehistoric field system, a manorial settlement, a Roman villa and an 'Ice House'.
- 2.42. However, more than 60 of the District's Scheduled Monuments are 'barrows', which are particularly abundant around Farway Hill, Gittisham, Woodbury Common and in the Rewe, Upton Pyne and Bramford Speke area. Barrows are a type of burial mound where earth, and / or stone is used to cover a tomb and 'bowl barrows' are named due to their appearance of an upturned bowl. They were created from the late Neolithic to late Bronze Age and provide important information on beliefs and customs as they served a ceremonial or ritual purpose. Barrows are often isolated but many occur in groups and are described as barrow cemeteries, three of which are in East Devon.



Farway: Bronze Age barrow

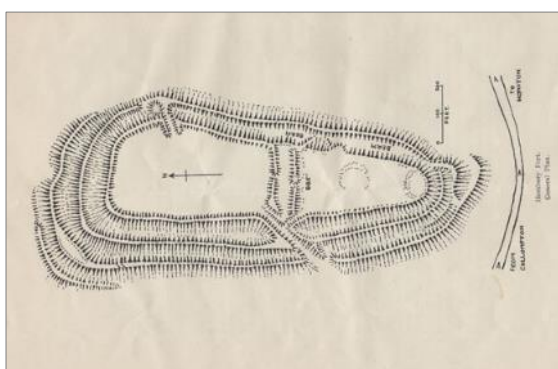


Blackbury Camp Iron Age hill fort

²⁰ Monuments are protected by the Ancient Monuments and Archaeological Areas Act (1979)

Example: Farway Hill barrows form part of the most dense and extensive concentration of barrows in Devon. They are diverse in form and size and some are a part of a barrow cemetery, whilst their association with Farway Castle provides additional historic interest.

- 2.43. **Hillforts:** Characteristic of the Iron Age, the remains of hillforts at Woodbury 'Castle', Blackbury Camp and Hembury have been tested by excavation and reveal complex entrances and ramparts. Other examples are the Seaton Down (inland) and Berry Camp (coastal) promontory forts.
- 2.44. **Roman villas:** Evidence of Romanised buildings or 'villas' at Seaton and Uplyme indicate that people eventually accommodated to Roman rule in this area.
- 2.45. **Castles:** The remains of structures, locally called castles but which are pre-historic hillforts, are also located at Belbury, Membury, Musbury, Sidbury and Stockland.
- 2.46. Concentrations of Scheduled Monuments can be found in locations near Brampford Speke, at Killerton Park, Farway Common and Woodbury Common, as seen on Map1.



Hembury Fort Drawing from the 1930's¹: This scheduled monument has a complex history from being a settlement during the Early Neolithic period, a Hillfort during the Iron Age and then a base for the Roman army in the first century. Its interesting history is currently included as part of a school curriculum.

Hembury Fort scheduled monument, Payhembury



Part of Dunkeswell Abbey scheduled monument (also described on page 48) and medieval churchyard cross at St John's the Baptist Church, Broadclyst

World Heritage Site

- 2.47. A World Heritage Site is “a natural or man-made site, area or structure recognized as being of outstanding international importance and therefore as deserving special protection²¹”. Sites are nominated to and inscribed by the World Heritage Convention (part of UNESCO).
- 2.48. The Dorset and East Devon Coast World Heritage Site (also known as the ‘Jurassic Coast’) was the first natural environment designated World Heritage Site in England, and is one of only 17 in England and 31 in the UK. Its 95 mile coastline extends from the River Exe in East Devon to Wareham in Dorset. Most of the East Devon part also falls within the East Devon AONB. The coast’s exposed sedimentary rocks gives a unique insight into 185 million years from the Triassic, Jurassic and Cretaceous periods. Further, there are heritage assets present as a consequence of the geology and a result of human interaction with it, for example Exeter Cathedral’s quarries at Dunscombe and Beer.



Parts of the World Heritage Coastline looking west from Beer Head revealing Cretaceous white chalk and greensand, and at Sandy Bay Cliffs, Exmouth made up of Triassic sandstone and mudstone.

Undesignated heritage assets in East Devon

- 2.49. The majority of heritage assets in East Devon, whether buildings, archaeological sites or areas of historic landscape character, do not enjoy statutory designation. Their conservation relies on the planning system and positive management by land and property owners. The Devon County Historic Environment Record at the time of writing (2018) records 20,602 heritage assets (designated and non-designated) that fall within the early prehistoric to modern periods.
- 2.50. Some of these may have the same significance as a designated heritage asset but have not yet been considered for designation. This would include such sites as the small Roman fort at Pomeroy Wood, Gittisham, and parts of the World War II Taunton Stop Line defences in the Axe Valley. Others are of regional or more local importance, but all are irreplaceable and require consideration in planning decisions.

²¹ Collins English Dictionary (2018)

Scope for a local list in East Devon

- 2.51. Whilst nationally designated assets form the highest tier of heritage interest there are many features in our towns, villages and countryside of local heritage value that help define places and establish their character, or which are otherwise of local importance. These features may not be deemed significant enough to warrant national status, but may be recognized on a 'local list'.
- 2.52. In 2018 we do not have a formal local list of assets that is recognized by East Devon District Council, however in Theme B the strategy sets out proposals, working with local communities, for the means to establish and manage such a list.

Landscape and natural environment designations

- 2.53. Whilst this strategy is primarily concerned with built heritage, East Devon also has areas of landscape and natural environments of great quality. In many cases these areas are home to heritage assets and form part of their setting, while landscapes and environments, having been informed or 'created' by past human activity such as parks and gardens, historic orchards or medieval field patterns, can be heritage assets in their own right. In this context, to some degree much of the landscape and countryside of East Devon can be seen to have a heritage value, though many traditionally farmed landscapes, in particular, have been 'improved' and lost much or some of their heritage value.



Landscapes: Blackdown Hills, view north from Honiton

Area of Outstanding Natural Beauty

- 2.55. An AONB is an important landscape with such outstanding distinctive character and natural beauty that it is protected in the national interest and designated by Natural England. East Devon has a landscape of exceptional quality, reflected in the designation of two Areas of Outstanding Natural Beauty covering about two thirds of the District, and also includes a small part of the Dorset AONB. AONB Management Plans actively promote the conservation of, access to and enjoyment of their historic environments.



Landscapes: Woodbury Common Pebblebed Heaths and view towards East Hill. An area of high environmental and heritage value with a concentration of landscape and heritage designations, within East Devon AONB

East Devon AONB

- 2.56. This area lies totally within East Devon and mainly in the southern third of the district (see map 1). It was designated in 1963 and covers 103 square miles (32%). The south includes part of the dramatic 'Jurassic Coast' World Heritage site. Inland, large expanses of heathland provide a contrast to woodlands and river valleys in the predominately pastoral landscape. The East Devon Pebble Beds at Woodbury and other commons form the largest single block of lowland heathland west of the New Forest. Steep sided Devon hedge-banks border fields and narrow country lanes, leading to the many villages and hamlets, with many houses and cottages built of local stone, pebbles, thatch and cob.

Blackdown Hills AONB

- 2.57. This area includes land in both Devon and Somerset and covers mainly the north eastern third of East Devon (see map 1). Designated in 1991, the AONB is a relatively unspoilt, diverse rural landscape. Stretching from a prominent steep scarp in the north, the area dips gently southward as a flat-topped plateau to Honiton in the South, dissected by spring-lined valleys. The traditional pattern of villages and hamlets along the valleys remain largely unchanged among some medieval patterns of small enclosed fields and narrow lanes with high hedge banks. Villages, hamlets, individual buildings and their settings form a vital element of the character of the Blackdown Hills, particularly because of the widespread use of chert, a local stone, and the area's well preserved, distinctive architecture.

Natural Landscapes and Green Infrastructure

- 2.58. There are many environments in East Devon that are also protected on account of their biodiversity or geological interest. Whilst typically, heritage considerations or assets would not form part of the reason for their designation, it may be that human management and activity has 'created' the biodiversity or geological interest. There can therefore be heritage interests that overlap the more formal biodiversity or geological interests of their designation.

Natural Landscape Designations

- 2.59. Special areas of conservation: These are strictly protected sites designated under the EC Habitats Directive relating to species other than birds.
- 2.60. Special protection areas: These are designated under the EU and are strictly protected sites for rare and vulnerable birds.
- 2.61. Sites of Special Scientific Interest: These are designated by Natural England to conserve their wildlife or geology.
- 2.62. Ramsar Sites: These are designated for the conservation and wise use of wetlands and their resources, when they meet the criteria of international importance.

Further information on heritage assets

- 2.63. In addition to providing information within this document, the Council plans to provide improved web pages for heritage advice, guidance and information, including links to other organisations specialising in heritage. This could, subject to resources, also host a forum for the exchange of information on heritage issues.

Proposed Actions:

- *Develop improved web pages on the Council's website for the provision and exchange of information on heritage issues relevant to East Devon*
- *Provide links to further guidance through the Council's web pages*

Promoting the heritage of East Devon

- 2.64. Apart from an improved website, the Council intends to further promote the heritage of East Devon through publicity, hosting an occasional event which could include workshops and attendance at other events.

Proposed Actions:

- *Promote the strategy and improved web pages*
- *Hold a heritage themed event including workshops*
- *Officer presence at other events*

Theme A: Summary

- *Our historic environment includes the built environment, archaeology and natural landscapes*
- *The unique history of our place makes our heritage distinctive*
- *Heritage assets are assessed by their ‘significance’ and the setting of an asset can also be significant*
- *Heritage assets may be nationally designated, or undesignated (but may be on a Local List)*
- *The District’s designated heritage assets include Listed Buildings, Scheduled Monuments , Registered Parks and Gardens, Conservation Areas and a World Heritage Site*
- *East Devon has 34 Conservation Areas varying widely in character*
- *Listed Buildings and Parks and Gardens may be Grade I, Grade II* or Grade II*
- *The District’s landscape designations include three Areas of Outstanding Natural Beauty and many protected landscape environments*
- *East Devon has an abundance of undesignated heritage assets, some of which are of the same importance as designated ones*

Objectives and Actions:

- 1 To enhance understanding of our heritage assets and their significance**
 - *Action: Provide information in the strategy and make this accessible to all*
 - *Action: Provide links to further guidance through the Council’s website*
- 2 To widen knowledge of the historic environment of East Devon and its assets**
 - *Action: Develop improved web pages on the Council’s website for the provision of information on heritage issues relevant to East Devon*
 - *Provide links to further guidance*
- 3 To celebrate and promote the heritage of East Devon**
 - *Action: Promote the strategy and improved web pages*
 - *Action: Hold a heritage themed event including workshops*
 - *Action: Officer presence at other events*

Theme B: Positively managing our historic environment

- 2.65. Our heritage assets are an irreplaceable resource, which make a valuable contribution to the character of East Devon. They generate many benefits, as explored in Theme C, enriching the quality of life for residents and visitors whilst helping to boost the local economy.
- 2.66. Without management, heritage assets may start to deteriorate, through either human activities or natural processes such as weathering. It is important therefore to address this with the positive management of our assets, whilst supporting new development that enhances local identity and distinctiveness.

East Devon District Council staff resources for heritage work

- 2.67. The Council places considerable weight on the importance of protecting the built heritage of East Devon, but it does so with limited resources. As a consequence, the emphasis in Council work has been to undertake regulatory tasks that it is required by law to do (specifically determining planning applications and listed building consent applications), rather than the more proactive aspects of conservation.
- 2.68. Combined with other economies due to the spending review within local government, this has meant very limited resources for conservation staff to carry out work such as monitoring buildings at risk, reviewing Conservation Areas and developing new opportunities through partnerships and communities.

Working with communities

- 2.69. The Localism Act (2011) encourages and gives additional powers for local communities to contribute to decision making in their areas. New approaches have emerged nationally with communities helping to assess what makes their location distinctive, appraise and review conservation areas and management plans, monitor buildings at risk and identify assets for a local list.
- 2.70. This strategy proposes introducing more of a role for our local communities in some tasks, with Council support, subject to adequate resources being available. Our proposals are set out in more detail in relation to specific tasks in this section, and more generally with respect to training and capacity building in Theme C.

Proposed Action:

- *Facilitate and advise on training for local communities to assist in managing heritage assets*

Designated heritage assets: development management

- 2.71. Most heritage assets are in private ownership and are maintained and managed by their owners. This is especially the case in respect of listed buildings, which are mainly domestic properties that are lived in by the property owners. These are typically well maintained and retain the features and integrity that warranted their listing in the first place.
- 2.72. However some maintenance and 'home improvements' can cause harm and should not in any case be undertaken in the absence of listed building consent (and potentially also planning permission). Historic England provides a range of guidance advocating good practice in the maintenance, repair and improvement of older buildings that are sympathetic to their historic character.
- 2.73. The Council has a range of legal and regulatory powers to manage heritage assets and development whilst there is a facility to support and encourage good practice. For example, planning permission and listed building consent are two separate consent processes granted by the Council through regulatory powers.
- 2.74. The main means by which East Devon District Council manage designated assets is through the statutory powers the council exercises as the Local Planning Authority.
- 2.75. The government sets out national policy with respect to the determination of planning applications which may affect heritage assets in the National Planning Policy Framework.²²

East Devon Local Plan Policy

- 2.76. The East Devon Local Plan elaborates on and provides more policy detail for the determination of applications. The document sets out policies for the management of development including the protection of archaeological sites, listed buildings, Conservation Areas and other heritage assets.
- 2.77. In most cases sympathetic development schemes can be bought forward but the Council will not grant permission for development involving substantial or total loss of significance of a designated heritage asset unless it can be demonstrated that it is necessary to achieve substantial public benefits that outweigh the harm or loss. Criteria apply, which are set out in policy EN9 of the local plan.

Planning applications

- 2.78. Where development is proposed, there is the need for planning permission and / or consent under the building regulations to be granted.²³ In considering planning applications the Council takes into account heritage considerations and specifically potential adverse impacts on any asset or the setting of an asset that might arise and seeks to secure the best outcomes whilst minimising adverse impacts.

²² DCLG (2018) National Planning Policy Framework Paragraphs 189 - 202

²³ "development" is legally defined and some minor building works do not constitute development

Listed building consent

- 2.79. Listed buildings and their settings are an important element of East Devon's character that the Council wishes to preserve. Alterations must be carried out with the greatest skill and care to ensure that changes are not detrimental to the special architectural and historic interest of the building.
- 2.80. Listed building consent, which is separate from any requirement for planning permission, is required if the works have an adverse impact on the significance of the heritage asset. Where a listed building is involved in, or is the subject of a development proposal, it can be that both planning permission and listed building consent are required to allow for development to go ahead.
- 2.81. The impact of a proposal on the setting of an asset contributes to a buildings significance as it provides a context, although setting is not a heritage asset, it is vital to an assets significance. When considering development proposals the significance of any heritage assets and their settings should be established as described in policy EN8 of the Local Plan. Detailed guidance is available in publications on 'Setting' and 'Curtilage' through Historic England.²⁴

Listing enhancement

- 2.82. Historic England now offers a more detailed entry for listed buildings which sets out clearly why a building has been listed and where its significance lies. An 'Enhanced List Entry' may exclude parts of the property internally and externally including extensions and other structures within the curtilage that would have been included under an old List Entry, where they are not part of its significance or the reason for original listing. An Enhanced List Entry provides certainty and clarity, informing decisions on what changes are possible for owners and local authorities where Listed Building Consent is needed.

Listed Buildings Enforcement Action

- 2.83. The owners of listed buildings are encouraged to keep their historic buildings well maintained and in use, although they are under no statutory obligation to do so. However when a building is being allowed to deteriorate, the Council has powers to take action to require the owner to undertake essential works through a Section 215 Notice²⁵, s.48 Repairs Notice or a s.54²⁶ Urgent Works Notice. Non-compliance with a notice can lead to prosecution or work undertaken by the Council, with measures to recover the cost.
- 2.84. In the case of empty properties, an improvement notice²⁷ maybe served on owners initially, but if this is not effective works in default can be completed by the Council whilst charging the owner for these essential repairs. Council tax may now be charged at 100% for properties that have been empty for more than 2 years, whilst management orders and compulsory purchase may be relevant enforcement action where other methods have not been effective.

²⁴ Historic England (2017) The Setting of Heritage Assets; (2018) Listed Buildings and Curtilage Advice note 10.

²⁵ Town and Country Planning Act (1990)

²⁶ Planning (Listed Buildings and Conservation Areas) Act 1990

²⁷ Section 11&12 Housing Act (2004)

Protecting National and Locally Important Archaeological Sites

- 2.85. Our archaeological heritage is often fragile and vulnerable to damage. Development that would harm nationally designated sites is not permitted. Development that would harm locally important sites or their settings will only be permitted where the need for development outweighs the damage to the archaeological interest of the site and its setting; details are set out in policy EN6 of the Local Plan.

Protecting Scheduled Monuments

- 2.86. Any work to a designated monument requires Scheduled Monument Consent, for which applications are made to Historic England. Preservation in situ is considered to be the most appropriate means to ensure protection.

Protecting Registered Parks and Gardens

- 2.87. For any proposed development, the impact on the special character of a registered park or garden must be considered and is a material consideration in the planning process.

Local list of undesignated assets

- 2.88. Many buildings, structures and archaeological sites contribute to the special character of East Devon but do not meet the criteria for national listing. The Council recognises the valuable contribution that these heritage assets make to local areas and is reviewing how they are identified and publicised.
- 2.89. A feature of local interest is one that retains its historic form and external detail and makes a positive contribution to the architectural and historic character of the locality for one or more criteria, such as age, rarity, historic association or aesthetic value.
- 2.90. Assets that meet the criteria can be placed on a 'local list' which gives recognition to their importance and may be taken into consideration in development proposals, which can help to speed up the planning process. A local list can also help to build a more comprehensive picture of an area's significance for future planning decisions.
- 2.91. At present we do not have a formal list of assets that is recognized by the Council, but further policy and guidance is recommended which will encourage local communities to put forward buildings and structures that are important to them.

Proposed Action:

- *Produce a Local Listing Guide for East Devon, to include selection criteria*

Heritage assets at risk

- 2.92. Designated heritage assets may be classified as 'at risk' due to negative changes through neglect, inappropriate development, crime or damage and can reflect or impact on an area's social and economic decline.
- 2.93. Whilst most designated heritage assets of East Devon are in good or reasonable condition, a small proportion are classed as 'at risk.' There were no Conservation Areas at risk in 2018, in comparison with 6% in England.
- 2.94. From the Historic England Heritage at Risk register 2018, which includes Grade I, Grade II*, Grade II Places of Worship and Scheduled Monuments there are 46 listed items defined as being at risk:

4 are Grade I:	2 Listed Buildings, 1 listed Place of Worship and 1 Registered Park
4 are Grade II*:	1 Listed Building and 3 listed Places of Worship
2 are Grade II	Places of Worship
36 are Scheduled Monuments	

Table 3: East Devon Heritage Assets at Risk Grading 2018 (Historic England Website, February 2018)

2 are category A:	Immediate risk of further rapid deterioration or loss of fabric; no solution agreed: Poltimore House (Grade II*) and Dunkeswell Abbey (Scheduled Monument); neither are in use and both are owned by a heritage charity.
7 are category C:	Slow decay; no solution agreed: 2 are the Tithe barn and stable at Bishop's Court, Clyst St Mary (Grade I) and privately owned, the other 5 are Grade I, Grade II* and Grade II churches
1 is category D:	Slow decay; solution agreed but not yet implemented: This is a Grade II* church
The remaining 37 assets at risk do not have a priority grading	

Table 4: East Devon Categories of Buildings at Risk 2017 (Historic England Website, November 2017)

- 2.95. 10 buildings at risk have a 'previous priority category', so are either improving or deteriorating, with two in the most serious category, where there is an immediate risk of rapid deterioration and no solution agreed. However a community project is being developed and some funding secured for Dunkeswell Abbey; for more detail see Theme C.

Scheduled Monuments at risk

- 2.96. Scheduled monuments may be vulnerable to development but are also exposed to pressures beyond the planning system, such as agricultural intensification, forestry and coastal erosion, which may present the greatest threat. In the southwest, 16% of scheduled monuments were on the at risk register in 2016, a trend which has gradually decreased from 21% in 2009.
- 2.97. In East Devon 26 (40%) out of the 64 registered barrows are at risk, and are the majority of scheduled monuments at risk, suffering from deterioration due to causes such as plant or shrub growth, farming activities or animal burrowing.

Managing assets at risk

- 2.98. Assessing the overall condition of assets and identifying those at the most risk helps to provide a basis for prioritising actions and resources, where available, to mitigate pressures and threats to those assets. 'Heritage at Risk' is an annual survey, compiled by Historic England, of assets whose value is under threat, as shown in the tables above. The condition of assets on the list are monitored and updated regularly by Historic England, with generally more frequent attention to those considered most at risk. New entries that are put forward for the list are also assessed by Historic England's regional team in the Southwest.
- 2.99. Historic England does not monitor Grade II listed buildings, unless they are places of worship, however have started a project, the "Grade II Listed Building Condition Survey". This offers support and training for specialist and community groups and individuals to help identify any Grade II assets at risk. Training is currently available for volunteers through the Historic England website.
- 2.100. A programme of monitoring buildings at risk in East Devon could help to identify patterns or trends and would be a valuable resource to help the council manage the most vulnerable assets. A programme could be established for communities to help assess the condition of Grade II buildings in their local area, setting priorities within conservation areas, for example.
- 2.101. Providing a link through the Council's webpages to the Historic England list of buildings at risk would help communities to identify new items for the list and potentially help to monitor the condition of those on the list.
- 2.102. The AONB Partnerships have been actively involved in managing Scheduled Monuments at risk. East Devon AONB has been working on improving the condition of six at-risk assets with the help of volunteers. Meanwhile, the Blackdown Hills AONB have trained volunteers as Historic England Heritage Wardens to record the condition of Scheduled Monuments in that area, including some site maintenance work.

Proposed Actions:

- *Provide information and a link to Historic England heritage assets at risk through the Council's webpages*
- *Monitor heritage assets at risk where possible, potentially including Grade II listed buildings in some areas, through local communities*

Managing and protecting our Conservation Areas

- 2.103. A range of planning controls exist to ensure that the special qualities and fabric of an area are not undermined by the loss or damage of important features, or damaged by inappropriate, insensitive developments. All properties are required to have their conservation area status recorded as a local land charge so that new owners are aware of their designation.
- 2.104. The main regulatory role the Council has is to determine planning applications taking conservation area status into account, guided by an area's character appraisal. Proposals for development are only permitted where they would preserve or enhance the appearance and character of the area so it is important that any new development through siting, scale, design and use of materials is complementary to the character and makes a positive contribution to the appearance of an area.
- 2.105. Other means of protection include control over the demolition of unlisted buildings and of works to trees, restrictions on the types of advertisement permitted and on other types of permitted development through an Article 4 direction.
- 2.106. Further, the local plan (22:15) describes how the Council will take positive steps to enhance character within the Conservation Areas, for example by encouraging an emphasis on the renovation and re-use of buildings rather than demolition and redevelopment.
- 2.107. The Council are legally obliged to review conservation areas 'from time to time' to include an assessment of whether boundaries need to be amended and new areas designated, and also have a duty to formulate and publish proposals for the preservation and enhancement of conservation areas (management plans).

Threats:

Increased traffic and parking problems, erosion of character through insensitive repairs, out of character shop signage and replacement of frontages, vacant buildings, cluttered signage, street furniture and overhead utility cables.

Opportunities:

Increase in community involvement, improved knowledge for local community groups, input to neighbourhood plan, partnership working in regeneration areas and tourist locations, re-use of vacant buildings attracting grant aid, sensitive repairs, conversions and development using local materials, with increased guidance.

Table 5: Examples of threats and opportunities within a conservation area



Examples of detracting features in Conservation Areas: Cluttered signage at Ottery St Mary (2013) and overhead power lines at Sidford (2018)

- 2.108. A 'Conservation Areas at Risk' programme monitored by Historic England collects information from local authority surveys. In 2017, no conservation areas are recorded as being at risk in East Devon, an improvement from 2014, when 3 were considered at risk.

Reviewing Conservation Areas and designating new areas

- 2.109. Over time, circumstances can change within conservation areas, parts can deteriorate or be improved, so there is a need to review our conservation area boundaries and consider the designation of new areas. In many conservation areas, however, there may be no need to revise a character appraisal, and a review may confirm that the original appraisal is still relevant.

East Devon Local Plan Strategy 49 states that:

“We will work with our partners and local communities to produce or update conservation area appraisals and conservation area management plans.”

- 2.110. The majority (26) of East Devon's conservation areas were fully appraised in 1999 and were subject to a programme of interim review during 2008 – 9. The remaining conservation areas were designated or subject to a full appraisal more recently, between 2007 and 2011.
- 2.111. It is proposed that we establish and undertake a programme of review for our conservation areas, including management plans where needed, starting with a detailed programme for the next three years. Local communities may become involved in appraising their conservation areas, starting with a supervised pilot scheme, as an option for the future.

Management plans and Article 4 directions

- 2.112. Management plans can be developed from up to date appraisals which identify threats and opportunities for the future of a conservation area, and set out priorities. Management proposals need to present clear design guidance based on the threats or vulnerabilities identified for an area and to be made available to residents and others involved in planning decisions.
- 2.113. An Article 4 direction may be applied to remove specific permitted development rights, where an accumulation of minor works through permitted development may undermine other positive work being carried in a conservation area. An example may be the removal of permitted development rights to alter windows or railings, in order to preserve the character of street facing facades.
- 2.114. However the government advises that Local Authorities should consider making an article 4 direction only in exceptional circumstances where the exercise of permitted development rights would harm local amenity, the historic environment or the proper planning of the area.

Proposed Actions:

- *Action: Develop a programme of conservation area review*
- *Action: Prepare reviews and management plans with a pilot scheme to involve communities in character appraisal*

Local distinctiveness promoting high quality new development

- 2.115. An understanding of heritage matters and applying sound vernacular design principles in new development can greatly assist in securing high quality development in the future.
- 2.116. A tendency towards 'anywhere design' prompted by economic pressures and an agenda of urgent house building in recent years has sometimes undermined an area's local distinctiveness. However it is possible to design new buildings in a locally distinctive way.
- 2.117. This may be critical when it involves, or is part of the setting of a heritage asset, but even when it is not, an understanding of the local forms and styles of design used in the past can be of great value in building future developments.
- 2.118. It will often be the case that new buildings need not be an imitation of the past (a 'pastiche') and in some cases this could actually be undesirable. Buildings can be designed in a locally distinct and contemporary way with an understanding of what makes a place distinctive or a building architecturally significant, whilst being informed by local materials and traditions. With heritage acting as a stimulus for good design in an area, such new buildings can inspire new development in the future.

East Devon Local Plan strategy 48 states that:

“We will work with our partners and local communities to produce Design Statements to guide new development and ensure its appropriateness.”

The conversion of existing buildings

- 2.119. The local plan and National Framework promote the use of existing buildings to accommodate new viable uses where appropriate and compatible with policy. The potential benefits of this are explored in Theme C. The same principles of design using local traditions and materials can be applied.

Use of local materials

- 2.120. In the past, difficulty in transporting materials meant that many buildings were traditionally constructed using local materials. The variety of geology in East Devon has resulted in a broad range of materials being used, which are sometimes very localised so that the character and appearance of our settlements can vary greatly.
- 2.121. The Council encourages the use of traditional materials and methods in new and converted buildings as a means to help define and enhance the quality of the built environment. This can be promoted with examples of best practice, guidance on the use and sourcing of local material. Design guides and other advice can be made more widely available and accessible to developers, residents, local businesses and local communities in general.

Examples local materials in construction:



Beer paving - local Beer stone and Beer workers cottages - local flint

Development in rural areas

- 2.122. The development of agricultural buildings in remote areas, where the need for large scale storage facilities is increasing, needs to be handled sensitively due to possible visual impacts on an historic landscape. The re-use of redundant farm buildings also needs to consider and safeguard the existing character of the historic environment.

Examples of recent renovations



Use of Beer stone at St Giles and St Nicholas parish church, Sidmouth and the Parish Church of St Andrew, Colyton. Renovation with cob and thatch, Otterton

Proposed Action:

- ***Provide links to further guidance to enable development which enhances distinctiveness, including sourcing of local materials***

Theme B: Summary

- *Heritage assets are an irreplaceable resource which may deteriorate without positive management*
- *There are limited resources within the Council to manage assets*
- *East Devon has 46 designated assets at risk recorded by Historic England (in 2018), mainly scheduled monuments*
- *Conservation areas require review and management*
- *The development of a Local List may help in planning decisions*
- *Enabling good design and the use of local materials helps distinctiveness*
- *Communities are a valuable resource to help manage heritage assets*

Objectives and Actions

1. Positively manage the heritage assets of East Devon

- *Action: Develop a programme of conservation area review*
- *Action: Prepare reviews and management plans with a pilot scheme to involve communities in character appraisal*
- *Action: Monitor heritage assets at risk where possible, potentially including Grade II listed buildings in some areas, through local communities*
- *Action: Provide information and a link to heritage assets at risk through the Council's webpages*

2. Involve local communities in managing heritage assets, especially conservation areas and assets at risk

- *Action: Facilitate and advise on training for local communities to help manage heritage assets*

3. Establish a Local List

- **Action:** *Produce a Local Listing Guide for East Devon, to include selection criteria*

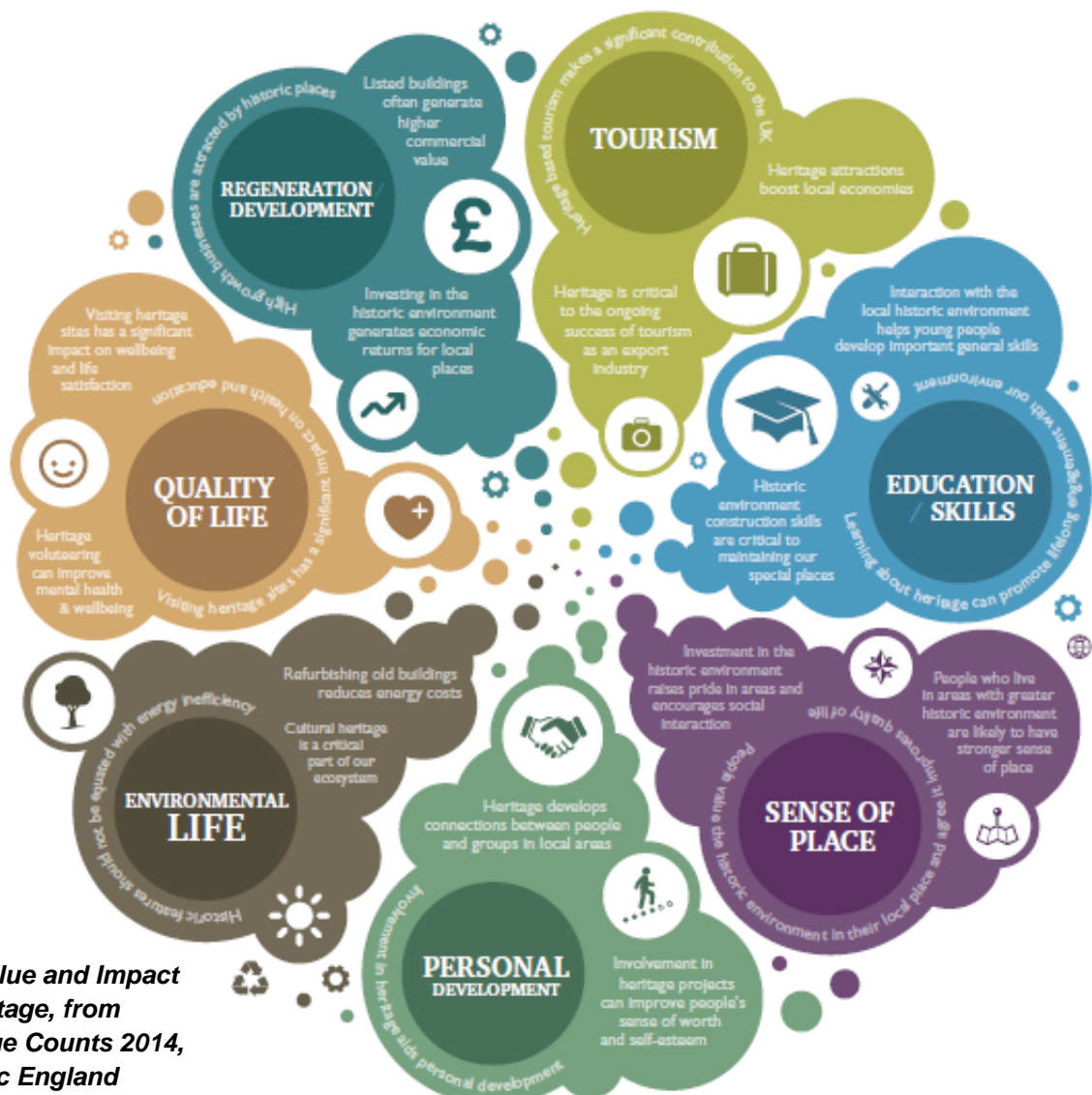
4. Encourage development which enhances distinctiveness

- *Action: Provide links to further guidance to enable development which enhances distinctiveness, including information on sourcing of local materials*

Theme C: Enhancing and benefiting from our heritage

The value and impact of heritage

- 2.123. The historic environment is an important feature of sustainable development and can provide social, economic and environmental benefits, which are often interlinked. Research by Historic England has identified many of these potential benefits, which are outlined below.
- 2.124. At a time of economies within the public sector, understanding the value and impact of our heritage is especially important. Working with partners and communities, we can help to enhance our heritage and make the most of these benefits. The involvement of local communities is vital to identifying and capitalizing on what is important for neighbourhoods and local areas.
- 2.125. Much of this theme looks to the future and some of the more proactive steps that can be taken identifying the need for, and opportunities gained from much greater partnership working. Being aware of and co-ordinating with other strategies and policies across the District encourages a coherent approach to make the most of our heritage assets.



The Value and Impact of Heritage, from Heritage Counts 2014, Historic England

Social, economic and environmental benefits

Social benefits

- 2.126. The heritage of a place can play a central role in local identity and distinctiveness, giving a sense of pride and belonging for local people and strengthening a community.
- 2.127. Further, the involvement of a community in heritage issues has been shown to improve well-being and quality of life. 'Heritage counts 2017, Heritage and Society'²⁸ finds that learning about heritage promotes lifelong engagement, whilst both visiting and volunteering in heritage brings happiness and can improve both physical and mental health:

"In a survey, 93% of residents said that local heritage has an impact on their quality of life, and 80% think local heritage makes the area a better place to live"

Economic benefits

- 2.128. The economy, regeneration and tourism are often fundamentally linked with the historic environment and the sectors can work together to enhance its benefits. Heritage Counts 2016 (Heritage and the Economy) describes the relationship between our national economy and heritage and how this market is experiencing strong growth, which is expected to continue.
- 2.129. Headline findings from the study were that heritage tourism (in England, in 2015) generated an estimated £18.4 billion in spending by domestic and international visitors, with £9.7 billion a directly generated output of the repair and maintenance of historic buildings. In 2013, there were an estimated 328,700²⁹ employed in heritage related services, with 44,100 (13.4%) in the Southwest.
- 2.130. In the Southwest in 2015, heritage tourism generated over £2.3 billion in spending by domestic and international visitors. The repair and maintenance of historic buildings in the South West directly generated £988 million in heritage-related construction sector output in 2016, which was equivalent to 8.9% of total construction output in the South West.
- 2.131. Findings from Heritage Counts 2017 also reveal that businesses are attracted by historic places, with the owners of creative enterprises especially attracted to historic buildings, and that listed buildings generate higher commercial returns. The results of surveys illustrate that investment in the historic environment generates growth and that there are economic benefits from the regeneration of historic places.
- 2.132. 'Heritage indicators' have been collected in the Southwest, mostly since 2002, indicating medium term trends which can help organisations to understand what is working and to set priorities for the future.

²⁸ Heritage Counts is produced by Historic England on behalf of the Historic Environment Forum (HEF)

²⁹ Including indirect and induced heritage employment

Heritage and tourism in East Devon



2.133. In East Devon, tourism and the visitor economy are important contributors to the vitality and vibrancy of the district's coastal and market towns and our rural communities. In turn, the traditional buildings of East Devon form a vital part the tourism appeal.

2.134. The Local Plan identifies the towns and villages with built up area boundaries as the best locations for new tourist accommodation. 'Sustainable tourism' can be encouraged including quiet countryside pursuits, and local products and services that do not compromise the historic landscape and environment.

- 2.135. It is estimated that in 2015 tourism contributed £252.5 million to the East Devon local economy, which was 3.5 million more than the previous year, indicating a positive trend.

Environmental benefits

- 2.136. Heritage assets can provide inspiration for the design of new development both within conservation areas and in new developments. This may help to reinforce local distinctiveness, including the use of local materials and encourage high quality, imaginative design.
- 2.137. Refurbishing historic buildings can help to reduce energy costs, with a range of measures to upgrade existing features to make them more energy efficient. Guidance is available on such measures through Historic England.³⁰

Enhancing our heritage assets

The impact and influence of linked policy

- 2.138. It is important to consider a range of policies within the Council and those of other organisations within or neighbouring the District, which have an impact on this strategy, so that a co-ordinated approach can be made. In addition to policies to protect, conserve and enhance the historic environment and to recognise the importance of local distinctiveness in design, the adopted Local Plan, in particular, has set out policies for the economy, tourism, town centres, villages and neighbourhood planning which may compliment and impact on the heritage strategy.

³⁰ Historic England (2017), Energy Efficiency and Historic Buildings available on the Historic England website

Local Plan Strategy 49 “...the contribution that historic places make to the economic and social well-being of the population will be recognised, evaluated and promoted.”

2.139. Wider objectives and priorities in the local plan include:

- Promoting East Devon and the wider region to create value and enjoyment of the area
- Actively seeking external funding and exploring alternative delivery mechanisms for a series of priority regeneration and development projects
- Creating opportunities through partnership and the planning process
- Strategically working with neighbouring authorities and other agencies, and
- Promoting and improving our town centres and high streets to encourage community identity, local services, more trade and stronger businesses

Town centres

2.140. Policies E9 and E10 of the local plan seek to ensure vitality and economic viability for town centres, whilst E13 encourages the use of upper floors within shopping centres.

Villages and the village Plan

2.141. Policy E9 is applied in the villages plan to the village centres of Beer and Colyton with a ‘vitality policy’ protecting the built environment so that a range of services and facilities are not lost. Both village centres are within a Conservation Area. There is a difference in the role of centres, for example Colyton village centre supports local needs and surrounding rural areas whereas that of Beer is also a visitor and tourist centre with specialist holiday accommodation.

Design and the Built heritage

2.142. The local plan stresses the importance of promoting high quality locally distinctive design standards and encourages the use of traditional materials and methods in buildings. This can inform and be integral to the work of designers, using local materials in sympathetic and traditional styles and forms.

Tourism

2.143. The local plan encourages tourism development, particularly where it enhances and capitalises on the geology, wildlife, coastline, countryside, historic environment and other assets that are unique to the District.

2.144. Strategy 33 commits to support and facilitate high quality tourism and sustainable growth. Tourism can help to initiate the regeneration of settlements and the marketing of East Devon’s assets through information technology is encouraged.

The local plan seeks to maintain and enhance the district’s visitor appeal “by working in partnership with East Devon’s tourism industry to promote the District as an all year round destination”

Working with local communities



2.145. Local communities are a valuable resource and we are fortunate in East Devon to have many specialist groups with expertise and knowledge of our local heritage. Residents, business owners and other interested parties may be involved in heritage issues through their parish councils, historic societies or neighbourhood planning groups.

2.146. It is beneficial for communities to help in assessing what makes our towns, villages and rural areas special. It is often a place's heritage that makes it locally distinctive and unique, which can give people a greater sense of identity and pride in their place.

- 2.147. During recent years of economic constraints within local authorities, different approaches towards conservation management have been emerging, with communities becoming more involved in the appraisal of their conservation areas, local listing and monitoring buildings at risk. Nationally, local groups have, for example, helped to prepare character appraisals and management plans for conservation areas.
- 2.148. In East Devon, communities have taken on ownership and accountability of their area through neighbourhood plans, with volunteers driving the process forward. There is potential to develop this further to help manage heritage assets in the future, and this is outlined for particular tasks in Theme B.
- 2.149. Community involvement in programmes will help to increase the skills, knowledge and experience to help conserve our heritage, whilst the Council can in turn strengthen links with local communities, demonstrate public accountability and encourage innovative ways of working.
- 2.150. There are also opportunities for people to work on specific projects to protect and enhance heritage assets in their area, in partnership with specialist organisations and groups. Under careful supervision and guidance, individuals may get involved in many ways and with a variety of skills such as 'ground truthing' (looking for structures below the ground detected by lidar surveys), vegetation removal, mapping exercises and researching historic documents.

Example: Dunkeswell Abbey (2017-19)

- 2.151. This Grade I listed building and Scheduled Monument is a ruin and a category 'A' building at risk. A partnership involving Devon County Council, Historic England, The Blackdown Hills AONB, Blackdown Hills Trust, the Abbey Church Trust and the local community will make a bid for funding from the Heritage Lottery "sharing heritage" fund in 2018-19. The partnership hope to work on many activities, including the investigation of a possible historic route for monks from Forde Abbey to Dunkeswell as a long distance walk, activities with primary schools, an earthworks survey with further ground truthing, vegetation removal from the site and the recording of Abbey walls.



Dunkeswell Abbey with the Church of Holy Trinity, Dunkeswell, in the background

Example: Woodbury ‘Castle’ Restoration Project (2017-18)

- 2.152. This is a scheduled monument which is also on the ‘at risk’ register. It is an Iron Age hillfort suffering from erosion, located within the Pebblebed Heaths of Woodbury Common. A project has been progressed in partnership with Clinton Devon Estates, the East Devon AONB, Devon County Council, the Devon Archaeology Society, the Pebblebed Heaths Conservation Trust and Friends of the Commons volunteers. Work has included clearing vegetation, providing new access steps, stabilising one of the ramparts and establishing new vegetation for the long term protection of its banks.
- 2.153. The project has been celebrated through guided walks and involvement of the local primary school, learning about the monument and sowing grass seed on the ramparts to help protect them for the future. The partnership hopes to establish a volunteer archaeological monitoring scheme for ongoing conservation work.



Woodbury Castle restoration project 2017- 2018, Woodbury Common.

Neighbourhood Planning

- 2.154. The Localism Act (2011) introduced Neighbourhood Planning, which gave local communities greater powers to make decisions about their area through a Neighbourhood Plan. There is much guidance available through Historic England on how to gather information on, and capture heritage within a plan. Both the Council’s Planning Department and Historic England can advise on the stages of development of a neighbourhood plan.

- 2.155. At the time of writing, 40 neighbourhood plans have designated in East Devon, which represent a large number of plans for a non - unitary Local Authority nationally. Eleven of these have been 'made' (are legally approved), whilst 29 are currently in production.
- 2.156. Within neighbourhood plans, policies can be developed relating to heritage. For example, the setting of heritage assets may be significant when allocating sites for housing development. Early conversations with the Council's Neighbourhood Planning Officer and Historic England can help to raise the awareness of sensitivities regarding heritage assets.
- 2.157. Made neighbourhood plans for Lypstone and Chardstock, for example, have policies relating to new development and their setting in relation to heritage issues. It is important, however, for any evidence provided to be proportionate to the scale of the neighbourhood plan.

Proposed Action:

- *Produce templates to guide neighbourhood planning groups in site assessments, in relation to heritage*

Training and capacity building

- 2.158. There are many sources of information available and training for groups and individuals to participate in managing their local heritage. Publications such as 'Knowing your place', 'Placecheck' and 'Understanding place' provide useful guidance from Historic England, whilst the Oxford Toolkit is a recommended guide on how to undertake a conservation area character appraisal. A Smartphone App 'Rate My View' is currently available for communities to record local points of interest. Devon County Council's Historic Environment Viewer and Heritage Gateway provide much information.
- 2.159. A resource is also available through the Devon Rural Archive (Significance of Place)³¹ website for communities engaged in Neighbourhood Plans, Conservation Area Appraisals and Management plans, providing guidance and workshops on heritage related matters.
- 2.160. Capacity Building can be developed within communities where residents help to train other residents in heritage issues through workshops, creating a valuable resource of knowledge and expertise.

Proposed Action:

- *Facilitate, or advise on, a range of training opportunities, especially for neighbourhood planning and other community groups with an interest in heritage*

³¹ <http://www.devonruralarchive.com/Significance-of-Place.html>

Working in partnership

- 2.161. Working in partnership and co-operating with other public bodies, organisations and agencies within and adjacent to the district means that approaches and work programmes can be co-ordinated where possible, and benefits can be maximised. Partners within the economic and tourism sector, for example, combine to regenerate areas and draw visitors and businesses to our towns and seaside resorts.
- 2.162. In the environmental sector partnerships such as those with the two Areas of Outstanding Natural Beauty help us to understand, protect and enhance our outstanding landscapes. For example, the East Devon AONB has produced an action plan based on Historic Landscape Characterisation carried out across Devon.
- 2.163. The District Council also works in partnership with Devon County Council to fulfil its obligations to have access to Historic Environmental Records and specialist archaeological and non-designated heritage asset planning advice.
- 2.164. Corporate working between Council departments including economic development, environmental health, housing and planning are also important where possible, to help work towards common objectives and overarching priorities. Working with partners and other departments within the Council can help to identify where joint projects may be progressed or bids for funding may be pursued, for example in our historic town centres or areas targeted for regeneration.

Regeneration

- 2.165. Heritage can provide the impetus for regeneration projects, especially where redundant historic Brownfield sites have proved not viable to bring back into use by a private owner due to the additional costs of specialist work. Empty or derelict buildings can have a negative effect on an area. Research has demonstrated the added value of bringing historic buildings into a good state of repair and into use, restoring confidence and attracting further investment. Solutions may need to be creative or innovative in terms of partnerships and sources of funding in order to tackle difficult sites.

Proposed Actions:

- *Increase attendance at partnership meetings to work towards common goals*
- *Create working group within the Council to work towards joint objectives and coordinate projects and programmes*
- *Work with partners and other departments to identify joint projects and funding*

Economic Development department

- 2.166. Working with this department we can help to identify heritage-led regeneration projects that will have social, economic and environmental benefits through, for example, improving tourist and town centre sites that are run down. Heritage has an important role to play in place-making and this may be part of a much wider programme working with other partners in the public and private sector.

Environmental Health department and private sector housing

- 2.167. Working with our private sector housing team can help to identify joint projects where heritage assets are in a poor state of repair. Owners may be encouraged to improve their properties through grant funding, loans or advice, or properties may be subject to enforcement action (as described in Theme B).
- 2.168. Listed buildings may become neglected and empty due to the cost of repairs. Owners can be encouraged to bring properties into use through empty homes loans at a beneficial rate, or where the owner may not be able to get a loan otherwise. There is currently (2018) potential through an organisation called AdHoc for empty homes to be occupied by tenants on a short term basis, helping properties not to fall into more disrepair.
- 2.169. Private sector house renovation schemes can be a vital part of a wider programme of regeneration, especially in our town centres, where additional benefits can be realised. For example, funding may be available for 'Living over the Shops' schemes where empty residential or commercial space is converted into living accommodation in our high streets and town centres.
- 2.170. Not only can such schemes improve the appearance of an area, encouraging owners and businesses to invest, but will house and bring in more residents, who are likely to shop locally. Many sustainable outcomes can be achieved through this. For example, with less car use carbon emissions are reduced bringing environmental benefits, while health may be improved as walking is encouraged to local shops, bringing social benefits, and retailers may have increased local trade bringing benefits to the local economy.

Example: Honiton High Street

- 2.171. A group of flats above commercial buildings within the conservation area are being upgraded (in 2017-8), with the Council working with the fire service to improve safety issues, which will help to keep the buildings occupied. This will in turn help to encourage the sustainable benefits explored above.

Area Regeneration

- 2.172. The historic environment can be a powerful tool for delivering regeneration and providing spaces for local businesses, community facilities and other activities. Areas targeted for regeneration, with co-ordinated programmes for improvement can have an effect on a much wider area as existing residents and businesses are likely to spend more on their properties, whilst new investors move in.





Example: Otter Mill, Switchgear factory and site, Ottery St Mary in 2013 and 2017 (previous page) and 2018 (above)

- 2.173. The regeneration of the Listed Town Mill, Mill House and Corn Mill buildings will greatly improve the sustainability of the area. This brownfield site has been neglected for many years and has been an eyesore at the entrance to the town centre and Conservation Area. The provision of housing will help to sustain local shops and add to town centre vitality. Its proximity to schools, shops and other major services will encourage walking and cycling, contributing to the health and wellbeing of the community whilst reducing carbon emissions. The restoration of these Listed Buildings will improve the local environment and help the town to become a more attractive location for local businesses and visitors.

Example: Seaton seafront

- 2.174. The World Heritage Coast and an adjacent conservation area combine to make a valuable resource for retail, tourism and day visitors. Seaton town centre and seafront have been targeted for improvement over many years, including a partnership between Devon County Council and the District Council to improve the appearance of the town centre and raise the quality of shop front development. Practice notes were adopted as supplementary planning guidance in 2002 and used to determine planning applications in the conservation area.
- 2.175. The renovation of individual sites which may have been an eyesore can also make a huge impact on an area, its heritage, sustainability and local economy, by encouraging investment in a previously unattractive location subject to uncertainty.



Seaton conservation area shop fronts and adjacent seafront

Town centres and high streets

- 2.176. The use of town centres is important for local communities - residents, businesses, and retailers as well as for visitors, providing a focus for social and communal activities. Historic buildings, streets and spaces can provide an attractive setting and a local identity to these places, contributing to their overall success. Historic England reports³² on how the role of town centres and high streets are changing due to economic, social, demographic and technological trends, which in turn have often had an effect on the local historic character.
- 2.177. Research has revealed a decline in the retail performance in town centres, along with the shift of large retailers away from town centres during the last 20 years. Replacing this is a trend towards leisure, food and drink, with a focus on quality and experience, and the growth of many restaurant groups and fashion retailers. Meanwhile, banks and post offices are closing leaving many prominent and listed buildings with the need for a new use. Emerging successful independent retailers are important for the vitality of town centres.
- 2.178. During the last decade, limited public sector funding combined with a lack of economic viability has been a consistent trend. With a lack of investment, the historic environment will suffer along with economic vitality, so the sensitive development of new shops is very important. Many smaller scale solutions are emerging, often in smaller centres where there is an understanding of the need to enhance local distinctiveness and a willingness to adapt to new challenges.
- 2.179. The publication 'The Changing Face of the High Street' (2013) looks at how local councils, developers and partnerships have sought to improve the vitality of these centres and the public realm by embracing their local heritage.
- 2.180. Cost effective ways of improving town centres include marketing and branding exercises, 'way-finding' and signage schemes, pop up shops, events and street markets. Meanwhile, joint initiatives involving empty properties, including 'living over the shop' schemes or shop front improvement can help to invigorate run down centres.

Branding and Competitiveness

- 2.181. Place branding can help to build the reputation of a place and improve the perception of residents, businesses, investors, workers and visitors. The role of heritage is important in building a brand that reflects local identity and a sense of place and it is estimated that the role of heritage in place making and place branding will grow. Place branding studies³³ have revealed that the main resources are heritage assets which help to differentiate places, provide an authenticity which has a wide appeal and can extend visitors 'dwell time'.

³²Historic England (2013) The Changing Face of the High Street: Decline and Revival

³³ Historic England (2017), Heritage Counts 2016

The historic town centres of East Devon

- 2.182. In East Devon, the town Centres of Ottery St Mary, Honiton, Budleigh Salterton, Axminster and Seaton are mainly or largely within a conservation area, making these attractive places for visitors. Some, such as Budleigh Salterton, are preserved more than others, while others such as Ottery St Mary are subject to more growth giving them very different identities and priorities for their future.

More information and maps on each historic town centre are in provided Appendix 1



Examples of Historic town centres: Honiton, Seaton and Axminster

Sources of Funding

- 2.183. The Heritage Funding Directory currently provides comprehensive details of a range of support that may be available for heritage interests through grants, loans, awards, education and training, and “in kind” resources. These are from central government, local authorities, agencies, EU and non-governmental bodies, trusts and corporate or private interests. Some of these organisations and types of funding are outlined below.

Historic England

- 2.184. The organisation provides grants for heritage assets at risk, though due to high demand, limited qualifying projects can be funded. A condition may be applied that offers public access to a grant aided site for a number of years. Repairs grants may be offered, mainly for urgent repairs to prevent loss or damage to important architectural, historic, archaeological and landscape features.
- 2.185. Grants for the repair and conservation of War Memorials may be available through the War Memorials Trust, whilst Historic England may offer funding to improve the management of field monuments through agreements with landowners or tenants.
- 2.186. The ‘heritage protection commission’s programme’ may grant aid projects to develop innovative ways to protect the environment from harm and enrich skills and expertise to help care for it. The ‘capacity building programme’ provides funding for projects which promote the conservation, understanding and enjoyment of the historic environment.

Heritage lottery fund

- 2.187. A share of funds raised through the National Lottery is available through the National Heritage Memorial fund (HLF) for a wide variety of heritage themed projects, including training in heritage skills and the restoration of historic buildings and monuments.

Local Authority

- 2.188. The Council may have resources available for empty homes through loans to bring them into repair and back into use.

Central Government

- 2.189. Energy schemes administered by the government are available from time to time with loans towards items such as draft proofing or insulating a property.

DEFRA³⁴

- 2.190. The Blackdown Hills and East Devon AONBs have secured funding from this organisation through the Sustainable Development Fund. This is aimed at supporting projects that bring social, environmental or economic benefits to the areas and demonstrate innovation and good practice, including training communities in heritage.

³⁴ Department for Environment, Food and Rural Affairs

Theme C: Summary

- *The interlinked benefits of heritage can be social, economic and environmental*
- *Tourism and visitors to heritage sites contribute to our economy*
- *Co-ordinated policies can help to enhance our heritage*
- *Communities can be involved in heritage in many ways*
- *Partnerships can help effective regeneration*
- *Distinctive historic town centres attract visitors and business*

Objectives and actions

1 Promote a better understanding of the value of heritage:

- *Action: provide information through the strategy and website*

2 Work with partners and corporately to identify joint projects and maximise funding:

- *Action: increase attendance at partnership meetings to work towards common goals*
- *Action: create working group within the Council to work towards joint objectives and co-ordinate projects and programmes*
- *Action: Work with partners and other departments to identify joint projects and funding*

3 Work with communities:

- *Action: facilitate, or advise on, a range of training opportunities within East Devon, for neighbourhood planning and other community groups with an interest in heritage*
- *Action: Produce templates to guide neighbourhood planning groups in site assessments in relation to heritage*

Section 3: Implementation



Colyton Conservation Area, from the Grade I listed Parish Church of St Andrew

Introduction

- 3.1. The strategy is proposed until 2031, to run alongside the East Devon Local Plan 2013 – 2031. It is recommended that a broad action plan is provided for implementation of the strategy for the next 12 years, with a detailed plan for the next three years to be monitored and reviewed on an annual basis.
- 3.2. Throughout the three themes of the strategy, objectives have been identified and proposed actions to meet those objectives are highlighted. A draft action plan for the first three years is set out in this section based on those objectives and actions, with the themes colour-coded in yellow, blue and green.
- 3.3. For each action an estimate is made of the resources needed, its timing and its priority (including whether a statutory duty). It is recommended that a more detailed action plan is produced following feedback from the public consultation, to be published alongside the final heritage strategy.
- 3.4. Resources and benefits are outlined, whilst a SWOT analysis highlights the main strengths, weaknesses, opportunities and threats of the strategy being delivered.

Resources

- 3.5. The actions recommended in this strategy have been carefully considered and are either a priority due to fulfilment a statutory duty, or are expected to produce significant beneficial outcomes and impact in the future, whilst minimising resources in the long term. Projects and programmes will be suitably progressed according to available resources.
- 3.6. Some specific tasks to help manage our heritage assets have been identified that staff within the planning policy section may perform, with a 'light touch' sign-off by conservation officers.
- 3.7. The participation of the community in helping to deliver parts of the strategy will also provide a valuable resource, contributing to its progress. In East Devon local volunteers have become engaged in Neighbourhood Planning and driven the process forward. Along with specialist historic interest groups, this impetus may be captured and taken forward for this strategy.
- 3.8. The investment of staff time facilitating and advising on training will be needed especially in the early stages, but as the programme develops, capacity should build within local communities to help manage their own assets. Training is currently available for some projects and the Council is investigating grant funding opportunities to support further work.
- 3.9. Cost effective ways of improving knowledge and engagement include circulation of the strategy in an accessible format and the provision of a more comprehensive website resource. New web pages can provide a base for the exchange of information and links to other organisations, guides and training in heritage issues.
- 3.10. An occasional heritage themed event at the Council offices and officer presence at other events are achievable ways of networking and promoting the heritage of East Devon. Local and regional organisations have offered their support for the strategy and these partnerships can be further developed to pool resources and deliver some common objectives in a cost effective way.

Benefits

- 3.11. The benefits that can be sustained or enhanced through delivery of the strategy are wide ranging, and are explored through the three themes.
- 3.12. Theme A aims to improve knowledge and understanding of the heritage of East Devon by making information accessible to a wide audience and by promoting its value. Benefits include increased awareness and appreciation of our heritage, active participation in heritage programmes and a feeling of identity and pride in local areas.
- 3.13. Theme B explores how we can manage our heritage assets through conservation area review, monitoring buildings and risk and local listing, all of which help to conserve our heritage. The strategy aims to increase community involvement in programmes, building on the strong neighbourhood planning groups and historic societies in East Devon. This will in turn increase the range of skills, knowledge and experience to help conserve our heritage.
- 3.14. Historic England reports on growing evidence of a positive relationship between heritage participation, wellbeing and quality of life³⁵. This includes findings that both visiting and volunteering in heritage brings happiness. Heritage participation helps to develop connections between people and groups in local areas, whilst building skills and personal development. All of these can contribute to improved mental and physical health.
- 3.15. For organisations, programmes involving the community encourage innovative ways of working, demonstrate public accountability and strengthen links with the community.
- 3.16. Theme C looks at how heritage can boost the economy through tourism and the attraction of our historic town centres, both directly, through the employment of specialised craftsmen and use of local materials, and indirectly through increased appeal for tourists, businesses and residents.
- 3.17. Visitors to heritage-related tourism generate considerable income for the local economy, helping local enterprise. Further, heritage often plays a central role in the regeneration of towns, with both people and businesses being attracted to characterful places.
- 3.18. Environmentally, the positive conservation of our heritage assets helps to reinforce local distinctiveness and encourage high quality design.

Monitoring

- 3.19. The monitoring of benefits will be developed in more detail where measurable targets are possible. Some indicators are already included in the local plan and others are collected by Historic England.
- 3.20. Measured outcomes can be detailed for pilot programmes initially to help the Council to monitor and review progress. In the long term the impact of projects delivered through the strategy can be assessed to inform the future planning of programmes.
- 3.21. Benefits may be measured through a range of surveys, questionnaires and interviews. The impact of community programmes may also be assessed using a matrix to explore the value of what has changed, and to what extent, against other programmes.

³⁵ Historic England (2017), Heritage counts 2017: Heritage and Society

Action Plan

Theme A: Understanding and appreciating our historic environment					
Objective	Action and tasks	Priority /notes	Financial Resources	Staff resources	Estimated time
Enhance understanding of heritage assets and their significance	Provide information and guidance in the strategy and make this accessible to all. Produce a user friendly document, with printed copies distributed to local communities.	High impact, moderate cost; much of this work completed	Printing and distribution of document	Policy staff, post room	1 year overall, including consultation
Widen knowledge of the heritage of East Devon and its assets	Develop improved web pages for the exchange and provision of information, including links to further guidance.	Medium priority, high impact, low cost	Website designer	Policy and conservation staff	Short term to set up with regular maintenance
Celebrate and promote the heritage of East Devon (raise the profile)	Host a heritage themed event / workshop for members and community representatives, officer presence at other events.	Medium priority and impact	Use of council chambers, catering	Policy and conservation staff, community officer and heritage champion	Moderate staff input. Short term, possibly once a year
	Promotion of strategy and web pages	Medium impact	Minimal	Policy team, heritage champion	Minimal, short term

Theme B: Positively managing our historic environment					
Objective	Action and tasks	Priority / notes	Financial resources	Staff resources	Estimated time
Positively manage the heritage assets of East Devon	Undertake a programme of conservation area review: Develop a programme of work to prioritise reviews; assess potential for policy staff and communities to help deliver reviews with a pilot scheme.	High priority - statutory duty. Include rapid review and bespoke methods where possible to minimise programme and resources.	Community training and capacity building - help from partners with potential for additional grant funding to assist in delivery of programme.	Programme established by conservation and policy staff.	Considerable input of staff resources and community initially but a long term activity, with some assistance from Historic England.
	Prepare appraisal reviews and management plans. Designate new areas where boundary change needed including consultation.	Capacity building for a valuable resource in future, with recognised benefits for the community.		Programme managed by policy and technical staff, working with communities; sign off by conservation officers.	Speed of progress will depend on level of grant funding secured.
	Maintain a heritage at risk register - provide information and a link to Historic England heritage assets at risk on the Council webpages.	High priority, statutory duty. Will help with monitoring assets at risk, below.		Policy and conservation staff	Minimal input with occasional updates
	Monitor heritage assets at risk where possible, potentially including Grade II surveys in neighbourhood planning / conservation areas, through communities. Develop a programme, with priorities, starting with a pilot scheme.	Current Grade II condition survey training material through Historic England; some localised projects monitoring other grades / scheduled monuments.	Community training and capacity building, assistance through HE and AONB partners	Policy staff to facilitate, some input from Historic England and conservation team.	Considerable input of communities with training initially. Potential for trained groups to take the project forward in the longer term.

Objective	Action and tasks	Priority / notes	Financial resources	Staff resources	Estimated time
Involve local communities in managing heritage assets	Facilitate training for local communities in managing heritage assets	Medium priority and instrumental in delivery of the long term strategy. Long term impact on protection of assets	Community training and capacity building (see above actions)	Policy staff (see above)	Moderate input of staff resources initially with continued supervision, depending on success of programmes
Establish a local list of non-designated assets	Produce a draft Local Listing Guide, to include selection criteria, for public consultation. Receive submissions from communities and historic groups.	Medium priority as not a statutory duty. Positive impact on planning process and benefits for local communities		Policy staff, with some input from conservation team	Public consultation over 6 months. Considerable time to set up lists, but less needed for annual maintenance
Encourage development which enhances distinctiveness	Provide further guidance which address the most common issues – links to Historic England publications. Provide information on the sourcing of local materials.	Medium priority, moderate impact on renewal and new development.		Conservation and policy staff	Short term staff input with occasional review.

Theme C: Enhancing and Benefitting from our Heritage					
Objective	Action and tasks	Priority / notes	Financial resources	Staff resources	Estimated time
Promote a better understanding of the value of heritage	Provide information through the strategy and website.	Medium		Policy and conservation staff	Moderate, short term, with occasional updates
Work with partners and corporately to identify joint projects and maximise funding	Increase attendance at partnership meetings to work towards common goals	Medium priority, potential high impact with identified projects		Policy staff	Regular meetings
	Create Council working group to work towards joint objectives and co-ordinate projects and programmes. Provide webpage links to regeneration, economy and tourism sectors.	Medium priority, potential high impact with identified projects and programmes		Environmental Health, Economic Development, Conservation, and Planning Policy staff.	Regular meetings
	Work with others to identify projects and sources of funding	Medium		Policy staff	Moderate, depending on project
Work with communities	Facilitate, or advise on, a range of training opportunities especially for neighbourhood planning / community groups with an interest in heritage	Medium	Included in theme B training	Policy staff	Included in theme B training
	Produce a template to guide neighbourhood planning groups in site assessments in relation to heritage	Medium		Policy staff	Minimal, short term

SWOT Analysis

<p>Strengths</p> <p>Rich history and culture Wealth of varied heritage assets Active neighbourhood planning and specialist historic groups Expertise within communities Support from other organisations</p>	<p>Weaknesses</p> <p>Lack of local government resources Lack of partnership working Some developers with lack of knowledge Unsympathetic development Tendency towards 'anywhere' design</p>
<p>Opportunities</p> <p>Increase knowledge Involve communities Develop partnerships Corporate working Improve webpages Encourage distinctive development</p>	<p>Threats</p> <p>Lack of support from Members Lack of support from communities Training for communities not available Lack of staff resources Lack of resources for website</p>

Analysis:

- 3.22. The table indicates that there are great strengths to drive our strategy forward. A district with a rich historic environment and a wealth of heritage assets, many specialist historic societies and groups, knowledgeable residents and active community groups. There is also excellent support from partner organisations such as Historic England, Devon County Council (Historic Environment Team) and the AONBs.
- 3.23. Through the themes of the strategy we have identified opportunities to promote the strategy and increase our knowledge and understanding of the district's heritage. There are also opportunities to work more closely with communities, Council departments and other partners.
- 3.24. A lack of local government resources and opportunities for partnership working may have restricted more proactive work on heritage issues in the past, whilst unsympathetic design in new development has in some cases diluted the distinctiveness of local places.
- 3.25. In the future, threats to delivery of the strategy mainly involve lack of support for the strategy and staff resources to deliver it, however suggestions for cost effective ways of delivering the objectives of the strategy and the potential for grant funding have been included in the action plan. Programmes can be tailored to suit available resources during the 12 year term of the strategy.

Section 4: Appendices



Whimple conservation area

Appendix 1: The historic town centres of East Devon

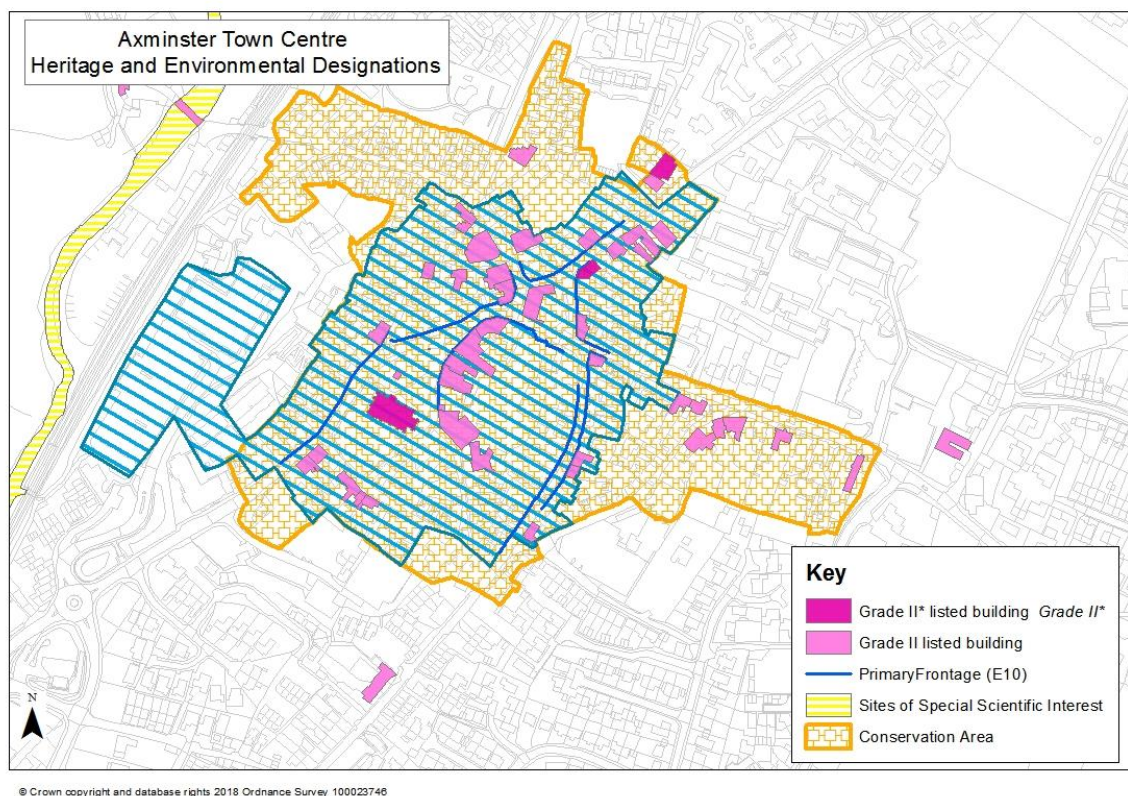
Axminster

Axminster has a long and rich history from its origins as a Roman roadside town, then Saxon, Royal and Ecclesiastical centre reflected in its character, and is noted for its textiles and carpet manufacture which started in the mid-18th century.

Most of the town centre area (policy E9) and all of the primary frontages are within the conservation area. Growth is proposed with town centre regeneration and improvements to access with provision of a new road to relieve traffic pressure on the historic town centre.

The vision for Axminster in the local plan is to conserve and enhance the fine built heritage of the town and surrounding countryside. There are good levels of food retail shopping but low levels of non-food retail which will be encouraged. Growth should support the range of independent shops in the town centre.

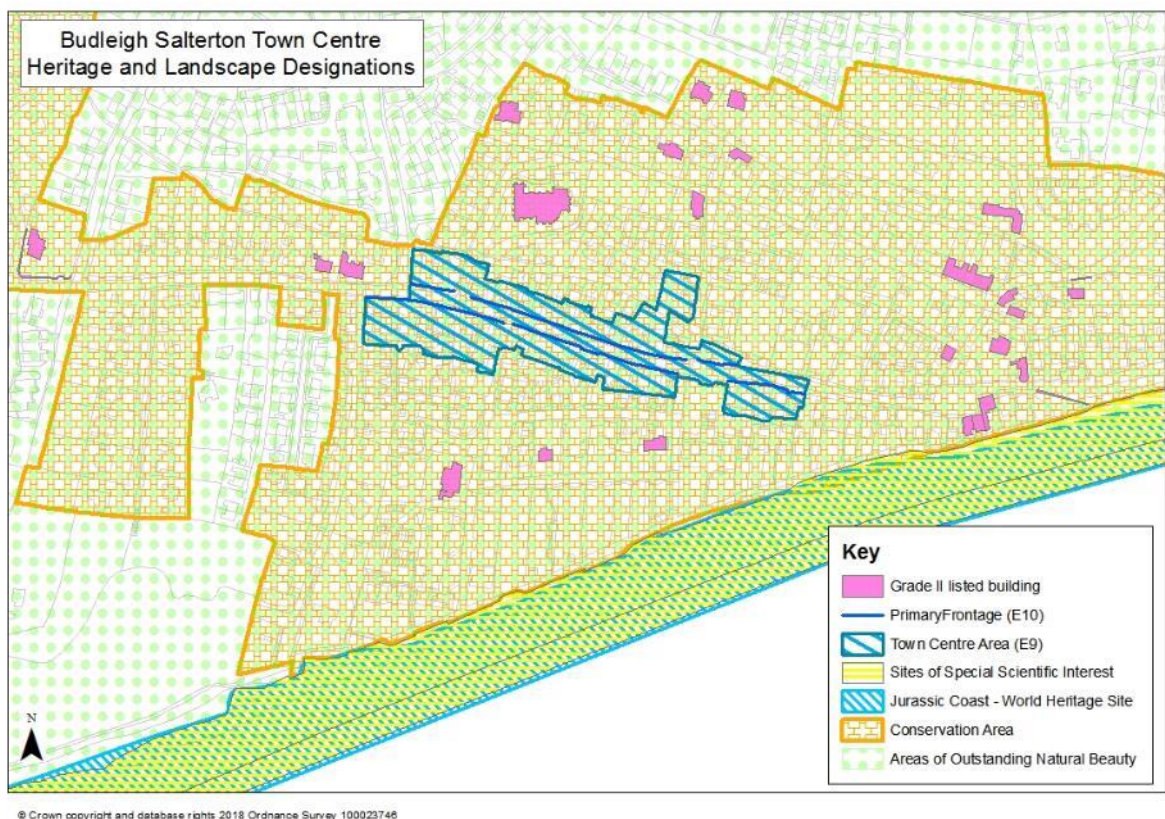
The local plan expects “that developments within the built up area, particularly in the town centre, will enhance the townscape quality, reinforce its independent market town character and so contribute to a sense of place”.



Budleigh Salterton

The town has a large conservation area which encompasses all of the Policy E9 town centre shopping area and primary frontage as well as a long stretch of the promenade at the seafront. It is the only town in East Devon which is completely within an AONB. The whole beach and adjoining coastline form part of the World Heritage Site and the town acts as a 'gateway entrance' to the site. The Otter estuary to the east is a Site of Special Scientific Interest. It is also known for "its rich and varied domestic architecture and absence of usual seaside commercialism"³⁶. As a result there are strict constraints on development within and adjoining the town.

The town centre contains many important building groups and stretches of unspoilt frontages within the conservation area (adopted in 2007). The town, which originated as a fishing hamlet particularly flourished between the early 19 and 20th centuries, and contains many attractive houses of the late Georgian and Regency period, as well as houses inspired by the Arts and Crafts movement.



³⁶ EDDC Conservation Area Appraisal (2007)

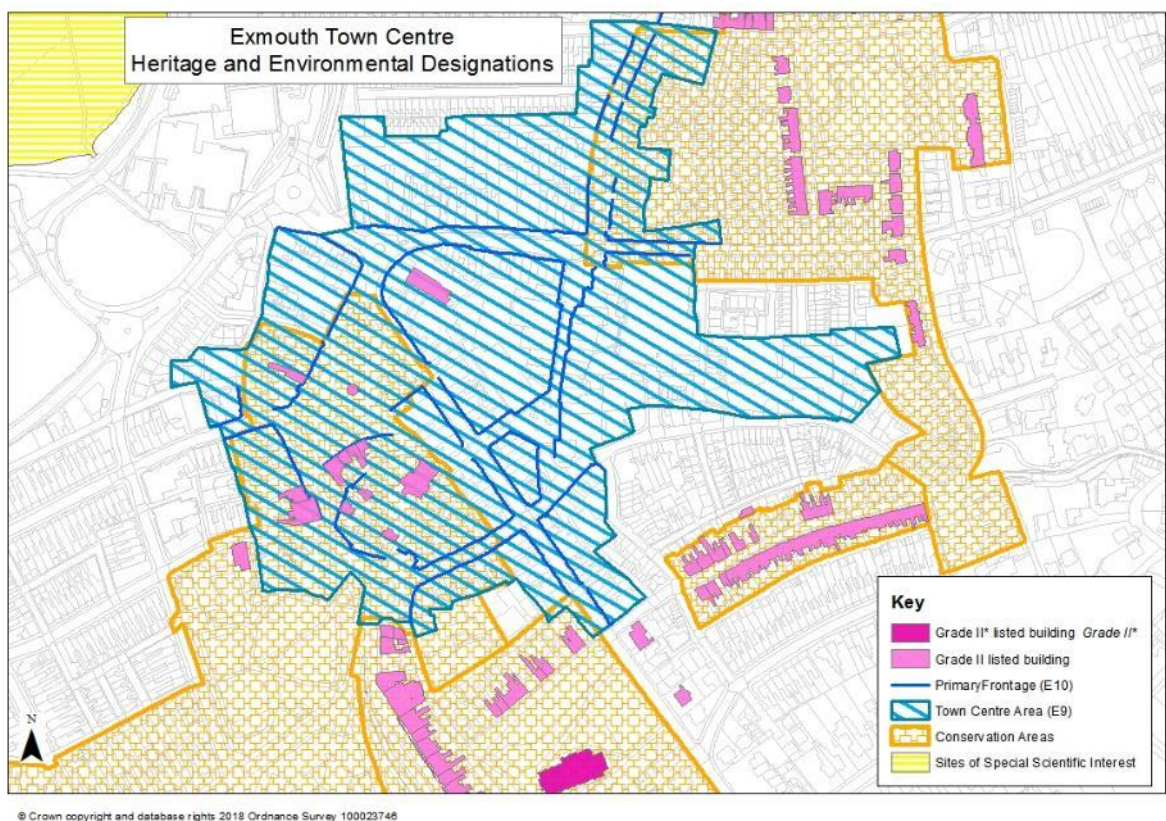
Exmouth

Only a small proportion of Exmouth town centre shopping area (Policy E9) and its primary frontages (E10) are within a conservation area, mainly the eastern side of Exeter Road on the outer fringe of the town centre. However conservation areas adjacent to the south and east borders of the centre include many terraces of listed buildings, mainly residential.

There is a focus on town centre enhancement, this area is close to the sea and estuary which are the main tourist areas. This includes an uninterrupted terrace of fine properties from the late 18th and early 19th centuries with sea views. At the nearby seafront, terraces of stuccoed buildings from the late 19th also contribute to the character of Exmouth.

Nearby, the Exe Estuary is a 'Ramsar' site while the World Heritage Site coastline begins further east beyond the promenade.

An Extensive Urban Survey project has been completed for Exmouth, recording the history, archaeological potential and historic character of the modern town. This is available online via the Devon County Council Historic Environment webpages.

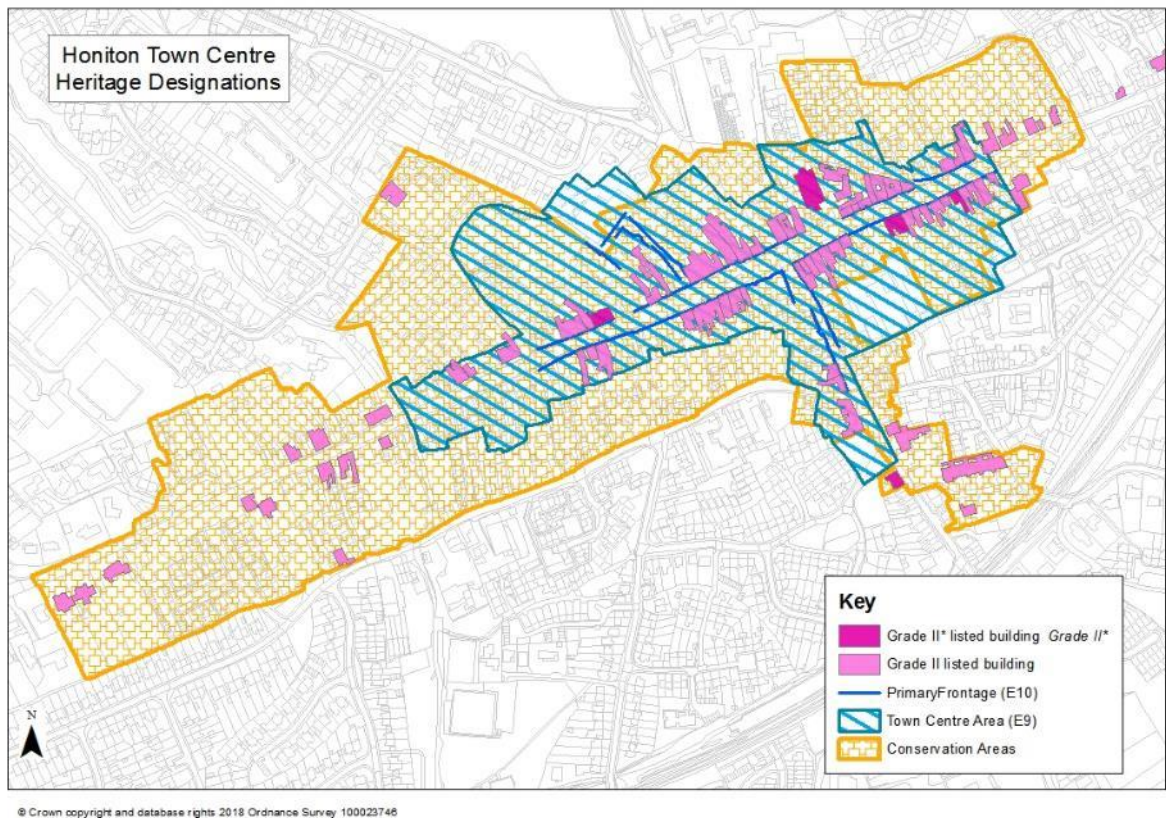


Honiton

The town centre of Honiton, mainly along one route, lies completely within a conservation area. This High Street is the former Exeter to Dorchester Road, and is flanked by listed buildings, mainly grade II but including some grade II*, and includes a concentration of heritage assets in the medieval planned town. A fire in the centre of the High Street led to many of the medieval cottages being replaced by Georgian houses although the much of the burgage plot layout still survives. One of the town's main functions was as a coaching stop, and many large inns remain, although some no longer function as such.

Honiton is noted for its antique shops that attract visitors to the town, access is excellent with a direct link to the adjacent A30 and a railway station serving the Exeter to Waterloo line.

The local plan aims to enhance the environmental quality of the town centre as a major asset for visitors and resource for residents (Strategy 23).

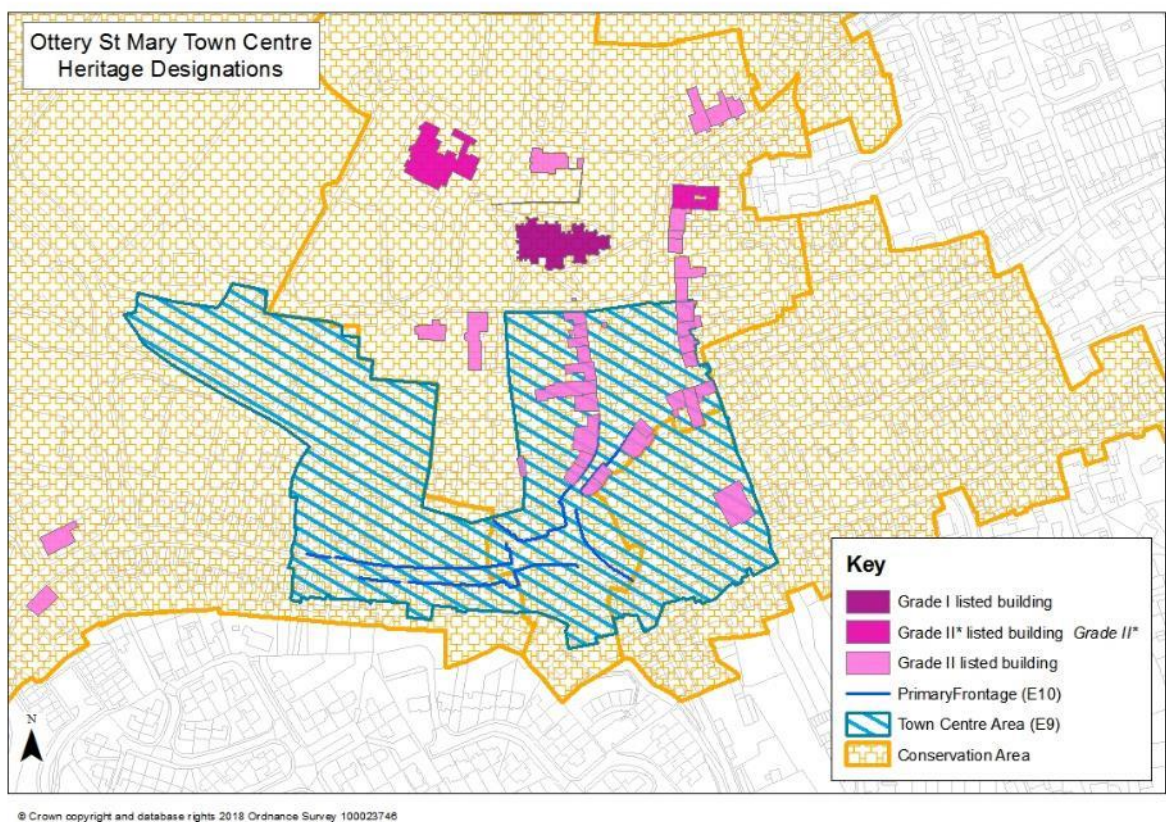


Ottery St Mary

The town is well known for its 'Tar Barrels' cultural event every November, which is believed to have originated in the 17th Century. It has a range of heritage assets where evidence from its early Saxon development, medieval town mill, parish church and collegiate, 18th century industrial development and 19th century literary greats can all be seen. It has a large conservation area, with an historic core of great architectural value within which lies the whole of the town centre including three rows of fine Georgian terraces and the Grade I St Mary's Parish Church.

The local plan has identified Ottery St Mary as a place for new homes and gives priority to the enhancement of the environment and the promotion of business opportunities in the town centre shopping area. Development is focussed on making the town a more vibrant area and the town centre more attractive for residents, businesses and visitors.

Close to the town centre a major regeneration project is centred on redevelopment of the listed 18th century flour mill and wool manufacturing unit. This will improve the setting of the main route into the town. Increased homes within the building and at nearby new developments will in turn help to enhance the viability of the town centre. Conserving the historic qualities of the town and especially the town centre, and promoting these as assets for residents and visitors to the town is a priority (Strategy 24 Local plan).



Seaton

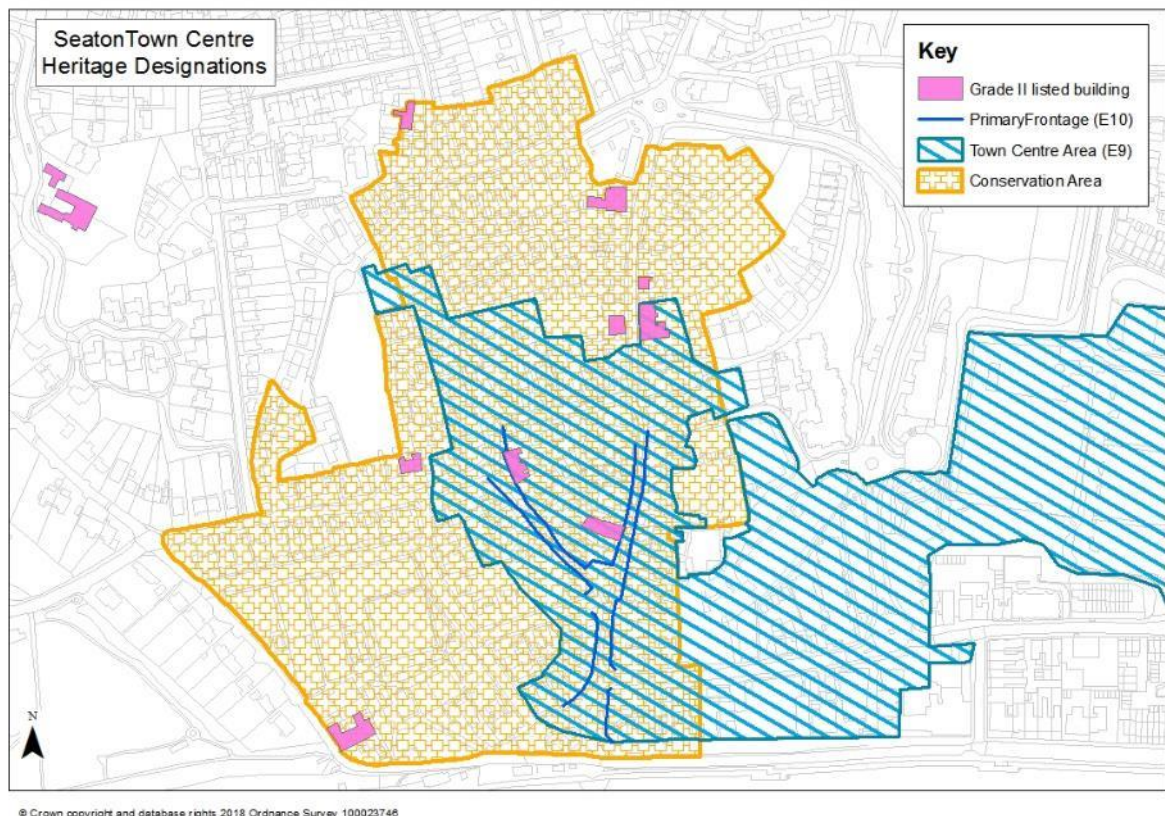
The local plan recognises the importance of the Jurassic Coast world heritage site and exceptional surrounding coastline as assets integral to the future success of the town. The town is surrounded by an AONB and a number of county wildlife sites.

The town centre contains distinct areas, the recent eastern half being dominated by a large supermarket, a central area which is a focus for regeneration and the western part of the site which lies almost entirely within a large conservation area. The southern part of this conservation area is adjacent to the beach and is a tourist site with distinctive street furniture celebrating the Jurassic Coast.

The local plan emphasises the importance of conserving the natural environment and surrounding ancient heritage assets as well as traditional seaside heritage, including the esplanade and harbour to make the most of 'leisure, cultural and commercial opportunities'.

Strategy 25 proposes that the Council work with partners to promote the town as a tourist destination and secure completion of the regeneration area. This includes the enhancement of existing fabric, design improvements, the expansion of commercial opportunities and promotion of businesses in the town centre to improve attraction of the town.

An Extensive Urban Survey project has been completed for Seaton, recording the history, archaeological potential and historic character of the modern town. This is available on-line via the DCC Historic Environment webpages.

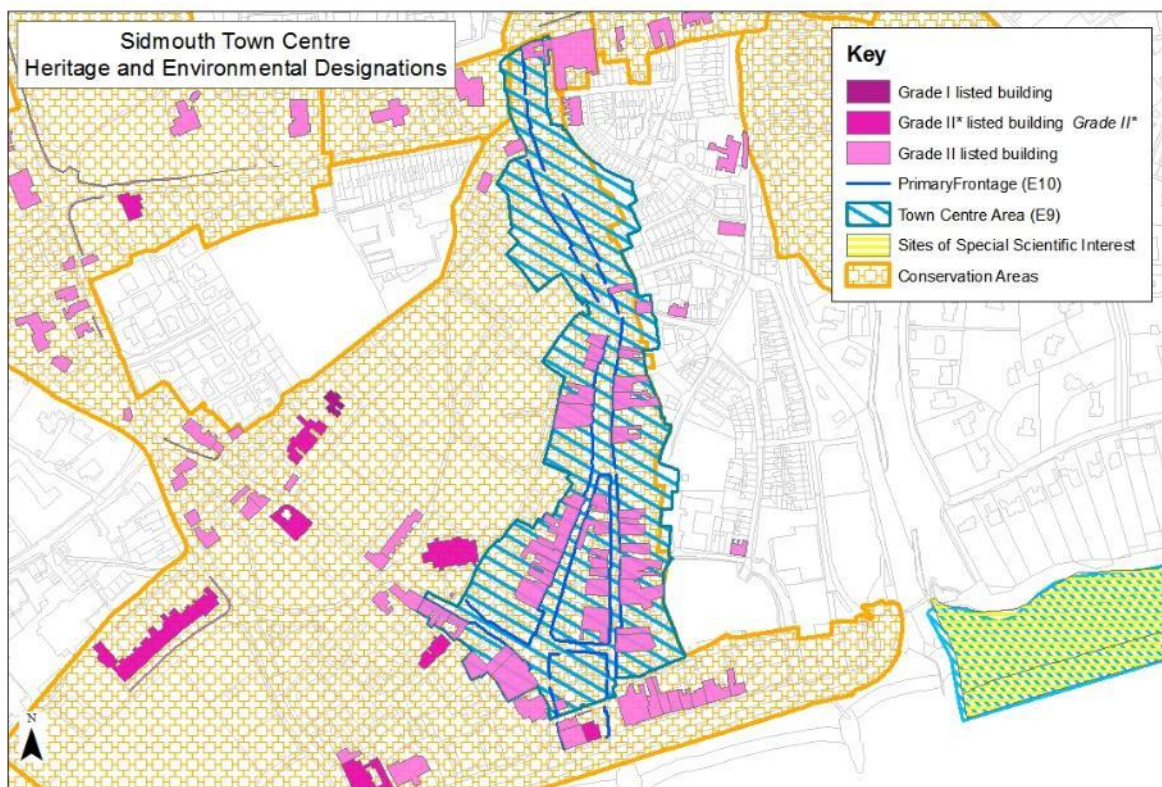


Sidmouth

The town centre is almost entirely within a conservation area. Many listed buildings line the primary retail frontage, especially to the south towards the sea and hotel area, making an attractive shopping area and tourist destination.

Sidmouth is nationally renowned as a fine Regency seaside town of 'exceptional charm, character and architectural value'³⁷. Like Seaton, the town is flanked by the Jurassic Coast World Heritage Site to the east and west and surrounded by an AONB. There are also extensive National Trust areas in and around the town, adding to its interest for tourists and visitors.

Sidmouth is designated as a "Gateway Town" for the Jurassic Coast World Heritage Site. The town centre is vibrant commercially with many independent shops, bars and cafes and is an important focal point socially for both residents and visitors. Strategy 26 emphasises that commercial development will be focussed on complimenting the high quality of the town and its importance as a year-round tourism destination. The conservation, enhancement and sensitive management of Sidmouth's heritage, and promotion of these assets, especially in the town centre and Seafront, should be continued.



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³⁷ From East Devon Local Plan (2013-31)

Appendix 2: The Conservation Areas of East Devon

This appendix provides a very brief description of the Conservation Areas of the District but detailed information on Conservation Areas can be found in each appraisal on the East Devon District Council website.

Villages / small towns:

Beer and extension: this covers most of the village centre and is adjacent to World Heritage Site and AONB. Comprising 20.09 hectares.

Broadclyst: the conservation covers the centre of a larger village. The village is surrounded by National Trust land, which is also designated for more than 50% of the conservation area. Includes 2 complete rows of listed buildings and grade I place of worship. Comprising 9.56 hectares.

Broadhembury: this takes up most of the small village and is totally within an AONB. There are a large proportion of listed buildings including a Grade I place of worship and 4 grade II* buildings. Comprising 7.2 hectares.

Bramford Speke: On the western borders of East Devon to the north of Exeter, this small village is mainly within the conservation area. To the east and partly inside the conservation area is an SSSI, and to the south a county wildlife park. The conservation area has a good proportion of listed buildings including a Grade I and a Grade II*. Comprising 14.93 hectares.

Chardstock has a Grade II* listed place of worship and is totally within an AONB. Comprising 8.1 hectares.

Colyford: follows a linear pattern along the main route, the eastern end is flanked by an AONB and a county wildlife site to the southeast. Comprising 14.31 hectares.

Colyton and extension: occupying the northern section which is the centre of this small town. It has been extended especially to the north and contains part of an AONB. Some larger listed buildings within the original area include a Grade I Place of Worship. Comprising 20.23 hectares.

Dunkeswell: the conservation area is centred on a cluster of farm buildings, cottages and a church.

East Budleigh: the conservation area covers the north western centre of this larger village, with terraces of listed buildings, a Grade II* and a Grade 1 place of worship. It is entirely within an AONB. Comprising 4.7 hectares.

Gittisham: is totally within an AONB, with a large proportion of listed buildings including a Grade I place of worship and a Grade II* building including a wall. Part of a registered park. Most of this small village is within the conservation area, of 4.7 hectares.

Kilmington: is the smallest conservation area, a large part is within an AONB and includes a Grade II* place of worship. Comprising 3.46 hectares.

Lympstone: the conservation area occupies the village centre and along the main route through the village to the river where the western boundary is adjacent to a special protection area, and just south of a National Trust site. There is a large proportion of listed buildings in this area including a Grade II* place of worship. Comprising 10.35 hectares.

Musbury: is totally within an AONB with many listed buildings and a Grade I place of worship; comprising 5.65 hectares

Otterton and extension: this is a large conservation area covering at least half of this larger village, mainly along the linear route through the village. It is totally within an AONB and has a good proportion of listed buildings, a terrace of workers cottages and a Grade II* place of worship. Comprising 13.98 hectares.

Salcombe Regis: is a very small village almost completely contained within the conservation area and completely within an AONB. There is a grade II* building. The south and south east boundaries of the conservation area are adjacent to a National Trust and a county wildlife site. The north of the area is dominated by a caravan site and farm. Comprising 6.82 hectares.

Sidbury and extension: this area covers about half of this medium sized village, is completely within an AONB and has a large proportion of listed buildings. It is overlooked by the prominent hill site of the Iron Age Sidbury Fort. Comprising 11.37 hectares.

Sowton: This small village close to junction 29 is almost entirely within the conservation area with a large proportion of listed buildings including a Grade I place of worship. 10.68 hectares.

Stockland: lies totally within an AONB, the conservation area covers most of this small village and includes a Grade I listed place of worship and a grade II* building (the reading room); comprising 8.12 hectares.

Whimble: One of the larger villages, the conservation area includes the village centre and main route, and a grade II* place of worship. Comprising 4.38 hectares

Woodbury: this is a large conservation area covering nearly half of this large village with a number of listed community buildings including the 2 pubs and primary school, a Grade I place of worship and a smaller row of grade II* buildings. Comprising 19.34 hectares.

Towns:

Axminster: the conservation area covers the town centre with a Grade II* church and many listed buildings along street frontage, comprising 10.58 hectares.

Budleigh Salterton: this is adjacent to the World Heritage Site, it contains all of the town centre, and is completely within an AONB, comprising 30.27 hectares.

Exmouth areas 1 and 2: a residential esplanade towards the seafront includes a continuous terrace of late 18th and early 19th century properties and a Grade II* place of worship. Behind this a street of listed small terraced properties – the complete row on one side. Comprising 13.02 hectares.

Exmouth area 3: this is mainly a residential area, with Victorian terraces and villas but including part of the town centre and retail frontage. Comprising 6.75 hectares.

Honiton: includes most of town centre and all of the primary retail frontage, with a large number of listed buildings along the high street. This was a Roman road and includes 6 Grade II* listed buildings. Comprising 21.09 hectares.

Ottery St Mary and extension: see town centres, theme C; comprises 52 hectares.

Seaton: This includes part of town centre, retail area and all of primary frontage, see Theme C. Comprises 11.48 hectares.

Sidmouth: Bickwell Valley and extension, in the western part of the town. This is a residential area partly designated as an AONB and partly a National Trust site. Contains 4 listed building and comprises 27.27 hectares.

Sidmouth: Elysian Fields ,including Grade II* listed church, this comprises 8.53 hectares

Sidmouth: Sidford: The conservation area is to the northern part of Sidford, along two main routes and includes a complete terrace of listed buildings. It is just to the south of an AONB. Comprising 4.04 hectares.

Sidmouth: Sid Vale and extension: Comprises 20.59 hectares.

Sidmouth: Town centre see Theme C; includes all of the town centre and primary frontage and comprises 28.91 hectares.

Combpyne Rousdon: most of this conservation area, comprising 85.13 hectares, is also a Registered Park including Grade II* buildings. It is adjacent to the World Heritage Site, a Site of Special Scientific Interest and a Special Area of Protection. It is totally within an AONB.

Appendix 3: Partners and list of local history organisations

Partners

East Devon AONB
Blackdown Hills AONB
Devon County Council
Historic England
Jurassic Coast World Heritage Site
National Trust

Local History Organisations

Axminster Historical Society
Axe Vale and District Conservation Society
Branscombe Project
Broadclyst Local History Society
Chardstock Historical Record Group
Colyton Parish History Society
Exmouth Historical and Archaeological Society
Feniton History Group
Hawkchurch History Society
Honiton History Society
Lympstone History Society
Membury History Society
Newton Poppleford Local History Group
Otter Valley Association
Ottery St. Mary Heritage Society
Sidmouth Local History Group
Sid Vale Association
Whimble History Society
Woodbury Local History Society

Report to: **Strategic Planning Committee**

Date of Meeting: Tuesday 27 November 2018

Public Document: Yes

Exemption: None



Review date for release It is envisaged that the Government will offer further opportunity to comment on matters relating to designated landscapes.

Agenda item: **13**

Subject: **Glover Review of Designated Landscapes - Call for Evidence Response**

Purpose of report: This report advises that the Government has asked for an independent review of England's National Parks and Areas of Outstanding Natural Beauty (AONBs). This report sets out the Council's proposed response to the call for evidence. Committee are asked to endorse the response.

Recommendation: **Members to endorse the proposed response to the Glover Review of Designated Landscapes**

Reason for recommendation: To gain endorsement for the proposed response to the Glover Review of Designated Landscapes - Call for Evidence to ensure it accurately reflects the Committee's views.

Officer: Ed Freeman, Service Lead – Strategic Planning and Development Management

Financial implications: No specific financial implications at this stage

Legal implications: There are no legal implications other than as set out in the report

Equalities impact: Low Impact

Risk: Low Risk

As endorsement is sought for a response to an external consultation there is a low identified risk associated with this report.

Links to background information:

- Related previous Cttee report <http://eastdevon.gov.uk/media/1183869/cabinet-agenda-120613-public-version.pdf>.
- https://consult.defra.gov.uk/land-use/landscapes-review-call-for-evidence/supporting_documents/landscapesreviewevidencedocument.pdf

Link to Council Plan: The proposed response has particular links to the council priority of *“Developing an outstanding local environment”* it does though address wider issues than ‘just’ the environment.

1. Introduction

- 1.1 As part of the 25 year plan to improve the environment, the Government have commissioned a review into whether the protections for National Parks and AONBs are still fit for purpose. The review’s purpose is to ask what might be done better, what changes could assist these areas and whether definitions and systems - which in many cases date back to their original creation - are still sufficient. Weakening or undermining existing protections or geographic scope are not considered. Led by Julian Glover and supported by an experienced advisory team, the review started in June 2018 and will report in 2019.
- 1.2 The review will consider:
- the existing statutory purposes for National Parks and AONBs and how effectively they are being met
 - the alignment of these purposes with the goals set out in the 25-Year Environment Plan
 - the case for extension or creation of new designated areas
 - how to improve individual and collective governance of National Parks and AONBs, and how that governance interacts with other national assets
 - the financing of National Parks and AONBs
 - how to enhance the environment and biodiversity in existing designations
 - how to build on the existing eight-point plan for National Parks and to connect more people with the natural environment from all sections of society and improve health and wellbeing
 - how well National Parks and AONBs support communities
 - the process of designating National Parks and AONBs and extending boundary areas, with a view to improving and expediting the process
- 1.3 Members may recall that Cabinet considered a proposal for the establishment of a new East Devon and Dorset National Park back in 2013. A campaign group promoted the idea but were not known to EDDC and had not previously consulted this council.
- 1.4 AONBs are designated for the quality of their landscape and in landscape terms they enjoy the same highest tier of landscape importance as National Parks. A very significant consideration, however, is that National Park authorities are the planning authority for the designated park area; they produce policy documents and determine planning applications (this is their key statutory role). In National Parks the vast majority of local government functions are not, however, undertaken by the park authority, they are undertaken by the constituent district/city/borough council and/or county council that the park falls within. National Park authorities are made up of appointed members drawn from constituent local authorities and other representatives. In contrast AONBs typically have management boards but these boards are not the Planning Authority for their area, though they may give comment and advice on planning matters; in this respect AONBs function very differently from the National Park authorities.

- 1.5 AONB boards and the management teams they are responsible for undertake a considerable amount of partnership work conserving and enhancing the landscape and environments of the AONBs and promoting the public understanding and enjoyment of these areas. There are over 30 AONBs in England and also AONBs in Wales and Northern Ireland. Whilst both are of great scenic beauty a difference between AONBs and National Parks is that AONBs offer more limited opportunities for extensive outdoor recreation that is typified in the wide open spaces with public access found in many National Parks.

2. Evidence responses

- 2.1 The Government web site that sets out the consultation questions, and more supporting and explanatory text can be viewed at:
<https://consult.defra.gov.uk/land-use/landscapes-review-call-for-evidence/>
Responses are sought, by the 18th December 2018, through an on-line questionnaire. This report reproduces the questions in the questionnaire and provides a proposed response to each one. Subject to committee consideration (including any amendments) and endorsement the responses given will be submitted on-line. Initial questions (1 to 6) relate to details of the responding organisation, so the questions to be considered in this report commence at Question 7 (the consultation questions are in bold text and the proposed response by this council in normal (non-bold) text). The proposed answers are written in the context of East Devon as a District with two significant AONB's (plus a very small area of Dorset AONB) but no National Parks.

2.2 **Question 7. What do you think works overall about the present system of National Parks and AONBs in England? Add any points that apply specifically to only National Parks or AONBs.**

National Parks and AONBs provide significant scope, specifically through planning processes though also through wider powers, to afford opportunities for landscape and wider general environmental protection and enhancement. This is of significant importance and should remain so in the future. A perception (if not measurable consideration) is, however, that the 'protection' afforded in National Parks is greater than that in AONBs. This no doubt is related to the comparative remoteness, sparsity of population and rugged character that will frequently typify National Parks in comparison with AONBs. In the context of Devon it is notable, for example, that the upland moorland that forms much of Dartmoor National Park, is a very different landscape from the more settled, more intensively farmed and less rugged landscapes of the East Devon AONB and the Blackdown Hills AONB. With a higher population density (this is more so for the East Devon AONB rather than the Blackdown Hills AONB) the pressures for further development and demands on land are often greater in AONBs than National Parks and it can be more challenging to reconcile what can be competing planning and development demands.

Notwithstanding the challenges that are faced in planning and managing AONB's the current systems do work and local authorities, in undertaking their duties - specifically

as planning authorities, are effective authorities. It is notable that the present system affords AONB's a visibly greater degree of landscape protection than undesignated areas, particularly noticeable in terms of scope to promote and secure high quality new design and settlement containment and also through opportunities for funding and subsidies to support environmental quality, especially in respect of farming and the wider management of land.

It would be desirable to see AONBs having a higher public recognition as areas of landscape and environmental worth and importance, in this respect National Parks clearly have greater public recognition. We would actively support further efforts to highlight the value and importance of AONBs, with this needing to be wider than just their landscape significance. We would, for example, highlight the lack of recent evidence and understanding relating specifically to the economic benefits that AONB status can generate for an area.

2.3 Question 8. What do you think does not work overall about the system and might be changed? Add any points that apply specifically to National Parks or AONBs.

We would identify a specific concern that National Park authorities have greater powers in respect of landscape protection than planning authorities covering AONB areas. Specifically Section 85 of the Countryside and Rights of Way Act (Crow Act and specifically the duty of due regard) should be strengthened to give parity across protected landscapes. This would enable AONB teams and partnerships to direct positive change in the countryside through enhancement.

Consideration should be given to whether the policies and implementation strategies in the AONB Management Plans should be afforded statutory weight and, provided they are in conformity, potentially form part of the Local Development Plan. At the present time AONB Management Plans may be seen to have peripheral importance in some decision making; however if they are to be afforded greater weight and importance, specifically if done so as a product of legislative changes, then they may need to be more rigorously produced.

Because AONB teams act in an advisory rather than statutory role in respect of planning activities it can mean that the specialist skills that AONB teams can potentially offer may be overlooked and the importance of the designations is not afforded the prominence that is appropriate. We would welcome investigation into whether and how the work of AONB teams can be put on a stronger statutory footing.

We would highlight the potential for production of more guidance explaining how to interpret and apply weight to the AONB designation, particularly in light of other competing interests and variation between authorities (leading to inconsistency, particularly across AONB's which straddle local authority boundaries).

As a potential quirk of AONB (or national park) designation, however, in rural areas which have significant AONB coverage there can be considerable pressure placed on

limited 'undesigned' countryside areas. Uses which may be deemed unacceptable within the AONB, most specifically urbanisation and development, are likely to be concentrated in relatively small areas to the possible detriment of those areas and the wider landscape and possible AONB setting.

2.4 Question 9. What views do you have about the role National Parks and AONBs play in nature conservation and biodiversity?

On a very simple level we would advocate AONBs (designated areas and people with responsibility for or over them) taking a more specific and active role in respect of promoting nature conservation and biodiversity interests. We add more comment to the sub-question 9 a) below.

a) Could they do more to enhance our wildlife and support the recovery of our natural habitats?

The position with regard to AONB's is not as clear cut as for National Parks which are legally required to conserve and enhance wildlife. Wildlife considerations are not included in the primary purpose of AONB's or the 'natural beauty criterion' upon which they are designated. The AONB Management Plan is expected to cross-refer to existing plans, including biodiversity action plans, but their status is not prioritised over other plans.

In our experience the East Devon AONB and the Blackdown Hills AONB Management Plans do specifically promote the conservation of wildlife, for its own sake but also because wildlife plays a fundamental part in the management of the landscape and the economic benefits brought by tourism and recreation. But taking wildlife considerations into account is not a requirement in legislation. It is also highlighted that policy documents can seek certain outcomes but to be effective they need real powers and to be taken appropriately into account by decision makers.

If natural habitats are to fully recover, protection needs to be further reaching. At present 'natural heritage features' are considered to be a factor in considering 'natural beauty criterion' but this is too vague. Small, specific areas of habitat are designated as 'protected areas' e.g. as National Nature Reserves (NNR's), Special Areas of Conservation (SAC's), Special Protection Areas (SPA's) or Sites of Special Scientific Interest (SSSI's), which protects the best wildlife habitats. But this doesn't protect the wider environment and their contribution to the overall landscape is localised and minimal. The AONB designation should convey greater protection to wildlife and specific habitat types within it, if they are to contribute to their conservation and enhancement and meet the objectives of the Governments 25 year Environment Plan.

2.5 **Question 10. What views do you have about the role National Parks and AONBs play in shaping landscape and beauty, or protecting cultural heritage?**

National Parks and AONBs are of intrinsic importance in showcasing and affording the means to conserve and enhance many of the best and most attractive landscape areas. Though sight should not be lost that many non-designated areas can be of real importance and far more readily accessible to many people.

The potential negative associated with having designated landscapes that are treated separately from the wider landscape, which makes up most of the country, is that protection of the designated area might be read as or inferred to mean that other areas should not be seen as important and not protected. What is evident is that in some parts of the country, with increasing and competing pressures for developable land the protection conveyed by National Parks and AONB's is considerable, but this can result in significant pressure falling to non-designated areas that may struggle to reasonably accommodate the growth.

In designated areas (and in many non-designated areas) there is an inherent link between the shape and form of the landscape, and features within and which help define it, and matters of cultural heritage. The landscape of England has been shaped by centuries of human activity and therefore protected landscapes form a cultural heritage asset in their own right.

2.6 **Question 11. What views do you have about the role National Parks and AONBs play in working with farmers and land managers and how might this change as the current system of farm payments is reformed?**

It is clear that National Parks and AONBs have been shaped by farming and land management over the years with next to none of England's protected landscapes (or any landscapes) being wilderness or even close to wildernesses. On the assumption that land will continue to be managed and farmed there will continue to be a need for close working with land managers and farmers.

If the system of farm payments is reformed in line with the Government's 25 year Environment Plan then farmers and landowners should receive financial support for measures which bring a 'public benefit' through environmental enhancement. If these measures are to transform broader landscapes into connecting habitats and larger corridors for wildlife (as recommended by Sir John Lawton in his review) there will need to be a strategic overview of proposals in an area and a comprehensive plan for implementation. Any such plan, in order to give this statutory weight, could become part of the Development Plan or be background material to inform and justify plan policy.

Under future funding or subsidy changes there are very real opportunities for the current role of National Park Authorities and AONB Partnerships to transform in a very positive manner though becoming bodies to manage large scale environmental improvement schemes. Such schemes which require the co-operation of private

individuals whose funding may have significantly changed. Under such a scenario it is likely that the park authority and AONB managers will need to work very closely, and sensitively, with farmers whose primary activity, in many cases, has previously been geared around heavily subsidised food production.

It is unclear whether the new payment scheme will differ outside the protected landscapes. However there could be increased pressure on these 'unprotected' countryside areas to intensify, and presumably industrialise, food production to compensate for the lower yields within the protected landscapes where priority is given to environmental improvement rather than productivity.

2.7 Question 12. What views do you have about the role National Parks and AONBs play in supporting and managing access and recreation?

Both National Parks and AONBs play very important roles in enabling the public to access the countryside, but AONB's offer more limited opportunities for extensive outdoor recreation than is typified by the wide open spaces with public access found in National Parks.

In AONB's the recreation role and efforts are often limited to maintaining existing access arrangements (especially keeping footpaths open and fit for purpose) and negotiating access across privately owned land to improve links between public footpaths and pockets of public open space. If the proposed changes to access legislation are brought in (consulted on in Summer 2018), making trespass a criminal offence rather than a civil matter, access to the countryside will be further limited.

Moving forward, there is scope to incorporate the requirement for public access to the countryside into the new programme of grants, so that those landowners who allow access over their land are given enhanced payments. Otherwise, apart from designated public footpaths, access to the countryside may require AONB managers to negotiate permissive or informal access on a more ad-hoc basis.

In the light of changes to subsidy regimes, and more widely review on National Parks and AONBs, there would appear to be very real and significant opportunities for further promoting the recreation role and potential that AONBs, in particular, have to offer and efforts should be made to comprehensively evaluate potential options for change. It is important, however, that the protected landscape remain a place for quiet activities based around and informed by the rural and peaceful areas that justify the designations in the first instance.

2.8 Question 13. What views do you have about the way National Park and AONB authorities affect people who live and work in their areas?

Those people that are most affected (sometimes negatively and sometimes positively – or perhaps at least their perceptions of impact) by the designations will be those that work on or manage the land – primarily farmers and foresters. To most

residents, leaving aside possible limitations over development they may be able to undertake, will be largely unaffected by the designations. It is difficult to see significant changes in the future to this position.

a) Are they properly supporting them and what could be done differently?

Given that it is the use and management of land that is and will be most affected by any changes in the protected landscapes it is suggested that greatest attention, to support provided, should be targeted towards those in land management, farming and forestry and any other sectors where use is made of land.

2.9 Question 14. What views do you have on the role National Park and AONB authorities play on housing and transport in their areas?

The pressure of development is increasing nationally and this is polarised in a District like East Devon which has a high level of 'objectively assessed need' for housing but only one third of the land is outside the AONB. In the case of East Devon there is a partnership approach to planning, through the Greater Exeter Strategic Plan, which may increase the pressure on the land outside the AONB to meet wider strategic development need. This urbanises the landscape around the AONB, may impact upon the setting and potentially create a stark barrier rather than a gradual transition between urban and rural areas.

In terms of planning for more local growth, most East Devon towns are wholly or substantially bounded by AONB's (and one town is entirely within one) which constrains their potential for future development. This leads to increasing pressure to allow development within the AONB's, increasingly dense urban areas and competition as to the relative value of important features e.g. which is more 'valued' and should not be developed - local open spaces within an urban area or the AONB which closely surrounds it. There is a lack of guidance on how to interpret and apply weight to the AONB designation, particularly given these other competing interests, and the value attributed may be subjective and varies greatly between authorities (leading to inconsistency across AONB's which straddle authority boundaries).

In East Devon, in the relatively small rural areas outside but abutting AONB's, development requiring a countryside location, but that would be unacceptable in the AONB's, is now concentrated. Whilst the planning authority accepts that there is an economic need for these types of development but rather than dispersing across the wider District, there are now large areas of solar panels, intensive farms in industrial scale buildings, holiday parks and other substantial users of land which cumulatively detract from the landscape as a whole.

In terms of transport, the rural road network is under strain from a lack of strategic investment, increased maintenance costs from flooding, drain and surface damage and an overall increase in vehicle numbers. Farm diversification has led to more and larger vehicles, particularly where industrial uses now occupy farm buildings. In considering planning applications, the planning authority take account of the access

arrangements in the immediate vicinity of a site but cumulative impacts on the wider road network have to be severe to justify refusing planning permission.

2.10 Question 15. What views do you have on the way they are governed individually at the moment? Is it effective or does it need to change, if so, how?

In East Devon, the AONB's are managed efficiently and the partnership structure combining a mix of expert Officers, locally accountable elected members and local interest groups provides an effective structure for managing priorities and co-ordinating projects. This is despite the complexities associated with the Blackdown Hills AONB straddling 2 County Councils, 3 Districts and a Borough Council.

If the 25 year Environment Plan objectives are to be met a suitable framework is needed (preferably a strengthened AONB Management Plan). Despite significant partnership effort, the condition of the natural capital stock (e.g. biodiversity declines, failing water quality, poor soil health leading to downstream flooding, lack of climate change adaptation and resilience) and a fragile rural economy are examples of factors impacting the ability to conserve and enhance in the AONB. AONB Management Plans should be locally accountable and managed and delivered by a broad partnership of interested parties who are trusted by local communities.

The new Environmental Land Management Scheme (ELMS) should be provided through the AONB Partnership to make best use of public money.

In order to deliver the new initiatives: Baselines and evidence would need to be strengthened to inform sound decision making. A resource plan would be needed to ascertain additional resources required. Existing governance systems of the AONB and other agencies would need to be reviewed.

AONB Partnerships could take on a more formal role such as overseeing the future rural support scheme delivery, as well as a lead role in delivering new ways of working. Additional funding will be required to assist farmers to adapt to new working practices

2.11 Question 16. What views do you have on whether they work collectively at the moment, for instance to share goals, encourage interest and involvement by the public and other organisations?

Whilst resources are tight current means of working in the two AONB's in East Devon are generally good and there would need to be a strong case for how things might work better in respect of any proposed changes. Partnership involvement, public, private companies, charities and interest groups that are involved in the AONB work will invariably be from those with a commitment and interest in the designated areas, where such parties have the time to spare.

2.12 Question 17. What views do you have on their efforts to involve people from all parts of society, to encourage volunteering and improve health and well-being?

Engaging meaningfully with local communities requires high quality, sustained approaches that builds trust, understanding and raises awareness, to build a sense of place and encourage on-going engagement. To avoid a 'boom and bust' time-limited project approach, a base level of engagement is required. Within our AONB's experience has demonstrated that targeted, time limited, externally funded engagement projects are highly successful in terms of engaging local communities, but suffer from a lack of continuity as funding runs out. Examples are nature & wellbeing projects helping/ aiding those most in need in and around the AONB and habitat/ species recovery projects.

Engagement with young people, through local associations such as Young Farmers and through schools and youth groups, is essential if the 25 year Environment Plan is to be delivered (as many of these young people will be directly involved in implementing it). Funding limits the work which is currently undertaken in these areas.

Health & wellbeing is a developing area of work that requires more investment if the link is to be strengthened between landscape management and public health. In terms of mental health specifically, rural workers are amongst the highest suicide rates and have higher rates of depression than the general population - this may be exacerbated in the short term as the changes in subsidies are introduced and working practices shift to meet the requirements of the 25 year Environmental Plan.

2.13 Question 18. What views do you have on the way they are funded and how this might change?

The present funding system isn't straightforward and may lead to uncertainty in the long term, particularly in implementing the 25 year Environmental Plan. AONB partnerships receive much of their funding from DEFRA, along with contributions from local district, county and borough councils and other organisations, whilst specific project funding and support is also obtained from other sources. None of this funding is permanently guaranteed and can fluctuate depending on the budgets of individual organisations year on year. For example, the Blackdown Hills AONB Partnership is funded by DEFRA, 2 County Councils, 1 Borough Council and 3 District Councils and one project - the Blackdown Hills Natural Futures Project - alone received a Heritage Lottery grant, funding from 3 specific local authority grants, 3 infrastructure providers and a charitable trust.

Going forward, the system needs to be reformed so that it is simpler, guaranteed in the longer term and is able to deliver the policies, actions and priorities in the Management Plan, particularly if these become statutory. It may be more resource efficient if AONB partnerships effectively operate as part of a Local Authority (although this is obviously more complicated where the AONB straddles several Districts), with directly employed staff.

2.14 Question 19. What views do you have on the process of designation - which means the way boundaries are defined and changed?

Natural England are the appropriate body to designate and amend AONB's. In terms of prioritising proposals, the first two criteria are supported: "if evidence suggests the land might meet the natural beauty criterion" and "there's local authority agreement that designation is appropriate" however the further criteria are too vague: "it has the available resource to evaluate the proposal" and "it's more important than other corporate priorities". If a consistent approach is to be applied to outstanding landscapes across England, then any landscape which meets the first two criteria should be prioritised and resources ring-fenced for this purpose. Designation should not be deferred for other, potentially completely unrelated and undefined, corporate priorities.

It is considered that Natural England do meet their responsibilities within existing AONB's and regularly "give advice to local planning authorities on development proposals" and "consider the conservation and enhancement of AONBs in its work, for example when carrying out land management activities or giving permission for statutory bodies to carry out works in an AONB". We would highlight, however, that staffing and resource levels at natural England are stretched and this has an impact on the service they can provide. It also leads to them charging for non-statutory areas of their work even though they may be vital to the protection and enhancement of AONB's and National Parks.

2.15 Question 20. What views do you have on whether areas should be given new designations? For instance, the creation of new National Parks or AONBs, or new types of designations for marine areas, urban landscapes or those near built-up areas

The principle of creating new National Parks and AONBs and extending protection to other areas through new designations is supported. It is not considered that East Devon warrants these types of additional protection (particularly given that two thirds of the District is already located within AONBs). However there is scope to review the AONB boundaries to potentially incorporate the high quality landscapes abutting some of the AONB's. Particularly, in the case of East Devon those boundaries between Seaton and Colyton and to the East of the District around Hawkchurch. These rural areas between AONB's were previously identified in the Devon Structure Plan as 'Areas of Great Landscape Value' but were not given any alternative protection when that Plan expired.

There have been suggestions in the past of creating a National Park incorporating the East Devon AONB. Concerns included the extensive time taken to establish a National Park, the economic uncertainty caused to local businesses and investors, and fundamental impacts on service provision and future development and use of land. The Council considers that the existing AONB status in East Devon combined

with emerging Local Plan and operational planning functions of the Development Management service of the Council provide the best mechanisms to meet and serve the balanced and sustainable development needs of the whole of East Devon.

The Council would also be concerned that the experience seen in the New Forest and the South Downs of rapidly increasing house prices would exacerbate the existing problem of providing affordable housing in our rural areas. In addition, the designation of a National Park incorporating the Dorset AONB would see a large part of East Devon administered and controlled from Dorset and notwithstanding the world heritage Jurassic coast designation it is generally considered that there is little commonality between the two areas and their administrative counties.

2.16 Question 21. Are there lessons that might be learnt from the way designated landscapes work in other parts of the United Kingdom, or abroad?

We would not identify any specific lessons to be learnt from elsewhere but would encourage the review work to fully consider the approaches applied and adopted by others.

2.17 Question 22. Do you think the terms currently used are the right ones? Would you suggest an alternative title for AONBs, for instance and if so what?

Whilst the 'AONB' term does not have full public recognition, and certainly much less so than 'National Park' it does have long standing and reasonable public recognition and it is a good descriptor of designated areas. The terminology is appropriate and we would question whether there would be any merit in a name change.

2.18 Question 23. The review has been asked to consider how designated landscapes work with other designations such as National Trails, Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), National Nature Reserves (NNRs) and Special Protected Areas (SPAs). Do you have any thoughts on how these relationships work and whether they could be improved?

The nature conservation designations are based on the presence of particular species, habitats or other special qualities and their fundamental purpose is separate from that of the National Parks and AONBs, which are designated for their outstanding landscape quality. Whilst the designations may complement each other and, for example, a particular protected habitat may contribute to the natural beauty criterion on which say an AONB is based, they are not dependent and can and should exist separately.

There is scope to improve public and landowner understanding of the importance of these designations but the actual legislation relating to them is usually more restrictive than the CROW Act responsibilities for AONB's.

With respect to national trails and other recreation or similar designation there would be more scope to promote positive links and synergies.

3. Conclusion

- 3.1 Members are asked to endorse the proposed response to the Glover Review of Designated Landscapes.

Report to: **Strategic Planning Committee**

Date of Meeting: Tuesday 27 November 2018

Public Document: Yes

Exemption: None



Review date for release The recommendation to committee seeks approval for consultation. It is envisaged that in early 2019 the Landscape Character Assessment, revised where appropriate, along with details of feedback from consultation will be presented back to Committee.

Agenda item: 14

Subject: **Landscape Character Assessment – Draft Report and Proposed Public Consultation**

Purpose of report: This report advises committee that we commissioned and have received from the consultancy firm of Fiona Fyfe Associates Ltd a proposed consultation draft of the - East Devon and Blackdown Hills Landscape Character Assessment and Management Guidelines - report. Committee are asked to endorse this draft document for public consultation.

Recommendation: **Strategic Planning Committee is recommended:**

- 1. To endorse the assessment and findings in the draft Landscape Character Assessment report; and**
- 2. Approve public consultation of this draft document to run for six weeks.**

Reason for recommendation: To gain endorsement for the draft Landscape Character Assessment and to also approve the document for public consultation in order to ensure feedback received can inform potential refinement and improvement of document content.

Officer: Ed Freeman, Service Lead – Strategic Planning and Development Management

Financial implications: No specific financial implications at this stage

Legal implications: The outcome of the consultation will ensure the Landscape Character Assessment identifies locally distinctive landscape features, characters and special qualities which will inform Local Plan and Neighbourhood Plan preparation as well as cross-boundary issues and proposals which may have an impact on East Devon. There are no legal implications other than as set out in the report

Equalities impact: Low Impact
Low Impact

Risk:	Low Risk As endorsement is sought for consultation there is a low identified risk associated with this report.
Links to background information:	<ul style="list-style-type: none"> There are links to background documents in the actual Landscape Character Assessment
Link to Council Plan:	The Landscape Character assessment has particular links to the council priority of “ <i>Developing an outstanding local environment</i> ” it does though address wider issues than ‘just’ the environment.

1. Introduction

- 1.1 A Landscape Character Assessment seeks to characterise and describe features, landform and land uses that make up the landscape. Through having a thorough understanding of landscape character it becomes easier to plan and manage potential changes in a more consistent and robust manner.
- 1.2 This Landscape Character Assessment, **the draft document is appended to this report**, covers the whole of East Devon District, which specifically includes the whole of the East Devon Area of Outstanding Natural Beauty (AONB), as well as the whole of the Blackdown Hills AONB. It should be noted that around 60% of the Blackdown Hills AONB falls in East Devon with the remainder, at District/Borough level, being in the local authority areas of Mid Devon, Taunton Deane and South Somerset.
- 1.3 This Landscape Character Assessment is not a brand new piece of work, rather it is an update of an assessment that was completed in 2008. The update responds to changes that have occurred, both in the landscape and also in approaches and methodology of assessment, since the original work was undertaken.
- 1.4 The Landscape Character Assessment is intended to have a wide range of end users – the list is not exhaustive but it includes planners, developers, farmers and foresters and land users and managers, those involved in conservation and more generally the public and local communities. The document therefore offers commentary, advice and recommendations relevant to these and other users and user groups.

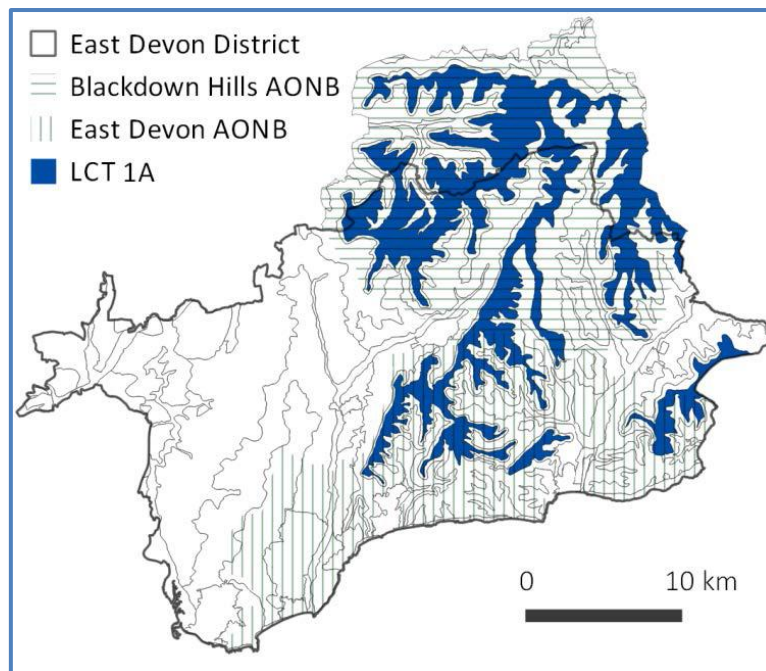
2. The form and structure of the assessment document

- 2.1 The bulk of the Landscape Character Assessment as based around 18 different landscape character types that are identified, categorised and found in East Devon. For example area type 1A is defined as “*Open Inland Planned Plateaux*” and the assessment advises that

“This LCT occurs in the eastern half of the Study Area, and contains some of the highest land. It comprises a series of elevated fingers of land which are flat or gently undulating. The boundaries of the LCT are generally clearly marked by the transition to steep scarp slopes below (LCT 2A). This is a relatively simple landscape, with

strong horizontal elements: flat horizons, straight roads and regular field boundaries.....”

- 2.2 The map reproduced below, taken from the assessment, defines the extent of this 1A character type. For this and the other 17 defined landscape character types the assessment describes the key characteristics that define and establish the landscape type, what past and current potential forces or factors exist that have or may produce changes (these are changes potentially for the worse, though could be for the better) and what changes may arise in the future. For each landscape character type the assessment also identifies a strategy for managing potential forces for change along with more detailed guidelines.



- 2.3 For a complete picture of all document content, and specifically all area types, the Landscape Character Assessment should be read in its entirety.

3. Commissioning of the Landscape Character Assessment and work to date

- 3.1 This Landscape Character Assessment was jointly commissioned by:

- East Devon District Council;
- Devon County Council;
- The Blackdown Hills AONB partnership; and
- The East Devon AONB partnership.

The consultancy team was led by Fiona Fyfe Associates Ltd. The work has and will continue to be partnership based.

- 3.2 Extensive fieldwork and research by the consultants has led to production of the very high quality document. There has been ongoing review of the emerging and evolving work that has been undertaken by an officer steering group drawn from the commissioning partners. As part of the document preparation there was a workshop in early summer 2018, in

Honiton, at which invited participants, drawn from a wide range of interest groups, were able to share their expertise to inform the work.

4. Proposed public consultation and report completion

- 4.1 Having now arrived at a draft document the next stage is proposed public consultation. Subject to committee approval the intention is that public consultation will run for six weeks. Any individual or organisation will be able to submit comments on the draft. We do not plan to ask specific questions in the consultation exercise or to provide a consultation form for respondents to fill in. Rather we will invite and welcome written comments on the document in any form or format that respondents consider appropriate.
- 4.2 The proposed consultation will be a joint exercise with joint 'ownership' by all of the commissioning partners though it will be coordinated and managed by officers of East Devon District Council. It will be for each of the commissioning bodies to ultimately determine if and in what manner they approve or adopt the final document.
- 4.3 In respect of approval by East Devon District Council the expectation, following consideration of feedback from consultation, is that officers will recommend that Strategic Planning Committee formally endorse the Landscape Character Assessment and approve its use and application in respect of works and proposals, specifically determining planning applications. This would extend to matters or considerations outside of the District boundary where there are cross-boundary issues or where proposals outside of East Devon could impact on the District.
- 4.4 On the basis of the above commentary the following timetable and programme of future work is envisaged:
- **Public consultation** – to run from Monday 29 October 2018 to mid-night on Monday 11 December 2018.
 - **Publication of comments received** – in December 2018/January 2019 comments received will be published on the East Devon District Council website.
 - **Officer consideration of responses received** – from December 2018 through to early February 2019 the officer steering group and consultant will consider comments received.
 - **Redrafting of the Landscape Character Assessment** - in February 2019 the consultant will amend the assessment in response to comments received.
 - **Recommendation for Landscape Character Assessment adoption** – it is proposed that a report will be presented to Strategic Planning Committee on 26 March 2019 recommending approval of the final report.

5. Potential for approval by other local authorities

- 5.1 It is noted earlier in this report that the Landscape Character Assessment covers the whole of the Blackdown Hills AONB and this includes, therefore, land that falls in the local authority areas of Mid Devon District Council, Taunton Deane Borough Council and South Somerset District Council, as well as Somerset County Council (and Devon County Council). These other authorities will be invited to make comment on the document at consultation and any observations made will be taken into account in potential document revision.
- 5.2 These separate local authorities (and any other organisation) may choose to formally endorse, adopt or give weight to the document in their working or they may conclude that this is inappropriate. Notwithstanding what position is taken by these other local authorities the key consideration is that it is envisaged that the Blackdown Hills AONB partnership will endorse the document. It will, therefore, inform their thinking and comments on works or proposals that are in or which could affect all or any parts of the Blackdown Hills AONB regardless of which local authority area or areas any works or proposals fall within.

Report to: **Strategic Planning Committee**

Date of Meeting: Tuesday 27 November 2018

Public Document: Yes

Exemption: None

Review date for release None



Agenda item: 15

Subject: **Cranbrook Plan Development Plan Document**

Purpose of report: The report provides an update on the production of the Cranbrook Plan Development Plan Document and associated timescales and also provides an update on current planning applications and development in the town.

Recommendation: **That Members note the content of the report**

Reason for recommendation: To allow the continued production of a Development Plan Document to guide the expansion of Cranbrook to around 8,000 homes to be progressed.

Officer: Ed Freeman, Strategic Lead Planning Strategy and Development Management, 01395 517519

Financial implications: No specific financial implications at this stage

Legal implications: At this update stage there are no legal implications other than those as set out within this report

Equalities impact: High Impact

The Development Plan document will need to ensure that the needs of all groups and sections of society are considered and catered for, including Gypsies and Travellers.

Risk: Medium Risk

The expansion of Cranbrook to circa 7850 homes represents the single largest contribution to meeting the strategic housing requirement in the District. It is vital that this comes forward on a comprehensive basis. The Cranbrook Development Plan document is identified in the Local Plan as being critical to securing the long term success of Cranbrook.

Links to background information:

- Cranbrook Plan Preferred Approach documentation
<http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-preferred-approach-consultation-201718/#article-content>
- Issues and Options report
<http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/issues-and-options-consultation/#article-content>
- Cranbrook Plan evidence base
<http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-preferred-approach-evidence-base/#article-content>

- Rockbeare Neighbourhood Plan
- <http://eastdevon.gov.uk/media/2653631/Rockbeare-Neighbourhood-Plan-Referendum-Version-July18.pdf>

Link to Council Plan: Encouraging communities to be outstanding, developing an outstanding local economy, delivering and promoting our outstanding environment.

1 Background

Outline planning permission for the first 2,900 homes at Cranbrook was issued in October 2010 followed shortly by the reserved matters for the first 1100 homes in April 2011. Development commenced in June 2011 and progress since then has been rapid. Particular milestones have included:

- The first households moving in during July 2012
- The opening of the first primary school (St Martin's) in September 2012
- The start of the bus service in May 2013
- Elections to the newly formed Cranbrook Town Council in May 2015
- The opening of the new education campus (including the second primary school and first secondary school) and the first shop in September 2015
- The commencement of rail services from Cranbrook station in December 2015
- The opening of the Cranberry Farm pub in the town centre in May 2017

Today there are approximately 1,850 households living at Cranbrook, equivalent to a population of around 4,300 people. The town has been given Healthy New Town status (one of only ten such developments in England) as part of an NHS England programme and alongside Exeter has been selected as one of 12 demonstrator sites for a Sport England Local Delivery Pilot aimed at tackling inactivity. These demonstrate that Cranbrook has a national profile.

2 Local Plan

The Local Plan anticipates Cranbrook comprising approximately 7,850 new homes by 2031. This equates to a population of around 18,500 people meaning that Cranbrook will have quickly expanded to become the second largest town in the District. Accommodating a further 4,270 homes at Cranbrook over and above what currently has the benefit of planning permission represents the single largest contribution to meeting the strategic housing requirement in the District.

3 Cranbrook Plan to date

In November 2014 the Council committed to a masterplanning exercise, known as the Cranbrook Plan, to review progress with the new town, refresh the vision and guide the expansion to 7,850 homes. Specifically this would address the 1,550 homes that are not currently allocated through Strategy 12.

In June and July 2016 an issues and options public consultation was held in relation to the Cranbrook Plan. The consultation responses highlighted that minimising impact upon surrounding communities, noise on proposed residents and returning London Road to being a focus for commercial development are all important factors to the public. The two favoured development scenarios both involved some development south of the London Road (B3174), including development to the north east of Rockbeare.

In November 2017, Strategic Planning Committee approved an 8 week period of consultation on a preferred approach document for the Cranbrook Plan, which took forward the favoured development scenarios and produced a draft masterplan for development to show these. This consultation ran from 10 November 2017 to 8 January 2018 and although was not a statutory requirement, consultation at such a stage is considered good practice.

The preferred approach consultation documentation comprised the masterplan for Cranbrook, which set out the evidence behind the preferred approach as well as plans identifying land for differing types of development, and a separate list of policy requirements. In addition, the Sustainability Appraisal and Strategic Environmental Assessment reports to accompany the plan were also consulted upon. The evidence base behind the plan was available for public viewing during the consultation period.

A total of 138 consultation responses were received during the consultation period. Of these, 6 were from Town and Parish Councils, 2 from County Councils (Devon and Somerset), 2 from District Councillors, 16 from other groups and consultation bodies, 12 from developers or agents and the remaining 100 from members of the public. The majority of the representations from members of the public were from residents of Cranbrook and the surrounding settlements of Broadclyst Station, Rockbeare and Whimble.

4 Progress since Preferred Approach consultation

Since the closing of the Preferred Approach consultation there have been two relevant changes to planning policy considerations in respect of the Cranbrook Plan DPD. The first is that in July 2018 the Government published the updated National Planning Policy Framework. The Cranbrook Plan DPD will need to ensure that it is in compliance with that document; Officers are confident of this being the case.

The second change arises from the making of the Rockbeare Neighbourhood Plan in October 2018. The Rockbeare Neighbourhood Plan now forms part of the East Devon Development Plan and includes policy Rock06 Green Wedge which builds upon Strategy 8 in the East Devon Local Plan 2013-2031 and states that development in the Green Wedge in the Rockbeare Neighbourhood Plan area will not be supported other than in limited cases (for agriculture, horticulture or forestry, to support the Clyst Valley Regional Park or where within existing curtilage and proportionate in scale and type).

At Preferred Approach stage, it was proposed to include a limited amount of built development in the identified Green Wedge in Rockbeare parish, which would be in conflict with Rock06. This particular matter was the subject of specific feedback to Members as part of the SPC report on 20 March 2018. Since then Officers have reviewed the inclusion of this land in the Cranbrook Plan and continue to be of the opinion that the evidence to justify inclusion of this land in the Cranbrook Plan is robust and backed up by landscape and visual impact evidence which demonstrates that there would be no visual coalescence between the two settlements due to land form. The inclusion of the land would allow for a more coherent pattern of development when assessing Cranbrook and its relationship with London Road whilst still retaining the character of Rockbeare and preserving views out of the village.

Legislation allows for there to be discrepancies between two plans, with section 38 of the Planning and Compulsory Purchase Act 2004 stating that where there is conflict between two plans, it must be resolved in favour of the policy which was last adopted, approved or published. On this basis, were the land allocations identified in the preferred approach document adopted, they would

supersede the part of Strategy 8 in reference to development in the Green Wedge near Cranbrook and Rock06 of the Rockbeare Neighbourhood Plan.

Viability testing of the Cranbrook Plan is being undertaken by external consultants, however at the time of writing this has not yet been completed and so the Plan cannot yet be finalised as this piece of work needs to be completed so as to find the plan viable and a final prioritisation exercise undertaken to firm up infrastructure funding.

In July 2018 Officers attended Cranbrook Day, a community event held at the Cranberry Farm pub. The event was very well attended and a community exercise of infrastructure prioritisation was undertaken and well received with positive feedback. The exercise gave the community the opportunity to identify what infrastructure they would fund if they only had a limited financial budget. When weighted by fully funding each item of infrastructure (the more expensive items were given the option of part funding), the fitting out of the permanent library was given the highest priority followed by the delivery of community buildings, temporary shops in the town centre and a leisure centre with swimming pool.

Since the report to SPC in March 2018 presenting feedback from the Preferred Approach consultation, additional work has been undertaken by external consultants in relation to landscape and visual impacts of specific areas for development in the Treasbeare and Cobdens areas following comments received during the consultation by the New Community Partners (current development consortium). This has helped to inform the extent of development in the eastern area of each parcel. A further piece of work to confirm the costs of undergrounding the overhead power lines in the Cobdens area has also been commissioned and these more accurate costs are informing the current viability testing exercise.

The Cranbrook Plan has been refined and development parcels amended in some areas since the Preferred Approach consultation and this is necessitating an updating of the drainage strategy for the expansion of the town to ensure that adequate Sustainable Urban Drainage solutions are available to support the development proposed.

Alongside production of the publication version of the Cranbrook Plan, work is being progressed on accompanying statutory documentation such as Sustainability Appraisal and Strategic Environmental Assessment as well as non-statutory supporting documentation and evidence to include a Health Impact Assessment.

The masterplan which was used as the main consultation document for the Preferred Approach consultation is required to be comprehensively updated to reflect changes made since the last consultation. The revised document will then form part of the evidence base to the Cranbrook Plan DPD.

5 Next steps

The proposed publication draft of the Cranbrook Plan will be reported to Strategic Planning Committee and Full Council for endorsement to submit to the Planning Inspectorate for examination in public. Due to the large amount of background work required to produce the final publication version of the plan it is now anticipated that the plan will be presented to Strategic Planning Committee at the meeting of 29 January 2019 and will then go to Full Council on 27 February. This is a delay of two months from that which Officers had been most recently anticipating.

Consultation would take place for a period of not less than 6 weeks following endorsement by Full Council. Following this final period of consultation the DPD and associated documents and supporting evidence, including comments received during the consultation, will be submitted for

examination. A government appointed planning inspector will assess the plan and come to final conclusions on whether it can be formally approved and adopted under plan making processes and regulations. The inspector may recommend a number of changes to the plan and it may also be that further consultation, on these, is required. On final adoption by the Council the plan will, however, carry its full statutory weight in decision making processes. It will be the primary document that is turned to and used in determining future planning applications at Cranbrook.

6 Update on current planning applications and projects

Of the 2900 homes granted outline planning permission in 2010, reserved matters approval has now been given for just over 1900 homes, leaving around 1000 homes left to be given such approval. Just under 4 years remains for these approvals to be sought under the terms of the outline consent.

The 587 homes granted under a separate full planning permission for phase 2 of the development are now complete and work on the delivery of homes in phase 3, to the east of the future town centre has begun with Persimmon and Taylor Wimpey both having occupations and a partnership between Galliford Try Partnerships and Live West (branded as Linden Homes for sales purposes) having commenced on site for 180 homes.

The final stretches of the main local route (MLR) through phase 4 of the town have been consented and work on their delivery has begun, which will result in a fourth roundabout onto London Road being provided at the junction to Rockbeare. Taylor Wimpey submitted a reserved matters approval for 256 homes in phase 4, at the eastern extremities of the town earlier in 2018. This application has not yet been determined as following a European Court of Justice decision in relation to the Habitat Regulations, we are now required to carry out an assessment of the impact of development upon the European protected sites of the Exe Estuary and Pebblebed Heaths. This has resulted in there being a requirement for the securing of mitigation in the form of a financial contribution for all housing yet to receive reserved matters approval at Cranbrook; the legal agreement for this is in the process of being drafted. The Taylor Wimpey application will be capable of determination once this has been resolved. Other sites with outline planning permission in the District are not anticipated to be affected by this Court decision as they will already have secured appropriate mitigation.

In 2014 an outline planning application was made by Cranbrook LVA Llp for up to 250 homes on land known as Farlands, north of London Road, but outside the allocated land for the expansion of the town. Discussions continue with the applicant in respect of this application and in particular regarding infrastructure requests to support the delivery of housing on this land, which the Preferred Approach consultation documentation identified for development.

In 2015 outline planning applications were submitted for the three expansion areas (Bluehayes, Cobdens and Treasbeare) in the control of members of the New Community Partners. Two of the three areas (bar Treasbeare) is allocated for development in the East Devon Local Plan 2013-2031. Each of the applications contained insufficient information in support of the submitted Environmental Statements and were subject of Regulation 22 (now Regulation 25) notices under the Environmental Impact Assessment Regulations, seeking additional information. The information requested has never been submitted in respect of any of the three applications and they continue to be held in abeyance.

In 2017 a revised outline planning application was submitted by Hallam Land Management and Taylor Wimpey for the Treasbeare expansion land. The application sought to address a number of concerns previously raised in relation to the earlier 2015 application and to more closely align with the anticipated masterplan. Discussions on this specific application have not progressed in recent months although discussions more generally on masterplan issues have been the subject of regular meetings in order to resolve conflict and share knowledge and expertise in order to reach a positive outcome for all.

Officers continue to work proactively with the New Community Partners, Cranbrook Town Council and Devon County Council in order to try to secure delivery of key items of infrastructure, particularly in the Town Centre. Discussions are underway with regard to finding a location for the proposed skateboard park and updated business planning for the Town Council Offices (with co-located library) has been jointly commissioned by Cranbrook Town Council and the Exeter and East Devon Growth Point team. This piece of work also looks at the financial implications of including a floor of lettable office space and 500 square metres of retail floor space in order to provide necessary facilities for residents and to provide the Town Council with a revenue stream. It is now accepted that a dedicated Country Park Resource Centre will not be delivered in the town but rather the Town Council Offices will be used for Country Park education purposes. Part of the previously identified S106 funding for this facility will be re-directed to providing an enhanced sports pavilion at the Ingrams sports pitches, which will fulfil the community function space that the Resource Centre would have delivered. A planning application for this building, alongside the second MUGA is anticipated shortly.

To date 10% of all homes at Cranbrook have been 'affordable by design' properties, whose maximum floor spaces have been limited by the terms of the existing S106 agreement. These are properties whose floor spaces have been below that which would normally be seen for two or three bedroom properties and which therefore have a lower open market value; they do not fall under the definition of affordable housing. With a drive to improve people's health and wellbeing at the town and lenders being increasingly reluctant to lend on the current terms of the S106 agreement, Officers consider it appropriate to cease the requirement for these houses to be delivered. A deed of variation to the S106 agreement is being progressed to deal with this matter.

Alongside the work detailed above, East Devon District Council Officers also sit on the Healthy New Towns Executive board and are actively involved in the Sport England Local Delivery pilot project, which is being hosted by Exeter City Council. Engagement in these two pilot projects is resulting in better co-ordination between stakeholders to the benefit of the residents of the town.

Report to: **Strategic Planning Committee**

Date of Meeting: Tuesday 27 November 2018

Public Document: Yes

Exemption: None

Review date for release None



Agenda item: 16

Subject: **Community Infrastructure Levy Members Working Party Terms of Reference**

Purpose of report: The CIL Working Party was set up by Strategic Planning Committee on 29 March 2017 (minute 44) and subsequently approved by Council on 26 April 2017 (minute 70). Given the potential range of interests which could be expressed in the future expenditure of CIL, it is in keeping with good practice and transparency in local government to have agreed terms of reference for this advisory body, which are accessible to the public, and a range of stakeholders.

Recommendation: **To agree the Community Infrastructure Levy Members Working Party Terms of Reference**

Reason for recommendation: Since the inception of the Community Infrastructure Levy Members Working Party, on Friday 8 September 2017, there have been no agreed Terms of Reference. Members of the group are, therefore, asked to agree the Terms of Reference as set out.

Officer: Susan Howl, Democratic Services Manager, 01395 517541

Financial implications: No specific financial implications with the terms of reference.

Legal implications: Other than to note that it is appropriate from a good governance point of view that there are clear terms of reference for the Working Group there are no direct legal implications arising.

Equalities impact: Low Impact
Since the Community Infrastructure Levy Members Working Party is an advisory body; the Strategic Planning Committee must give due regard to potential equalities impacts on those with protected characteristics when considering future expenditure of CIL.

Risk: Low Risk

Links to background information:

- [Strategic Planning Committee Minutes from 29 March 2017 \(minute 44 - Community Infrastructure Levy – Governance\)](#)
- [Council Minutes from 26 April 2017 \(minute 70 – Minutes of Cabinet and Committees\)](#).

Link to Council Plan: Encouraging communities to be outstanding; Developing an outstanding local economy; Delivering and promoting our outstanding environment; and Continuously improving to be an outstanding council.

Community Infrastructure Levy (CIL) Member Working Party

Membership: 5 Members of the Strategic Planning Committee

Meetings: As and when required

Quorum: 3

Community Infrastructure Levy

The Community Infrastructure Levy (CIL) is a planning charge, introduced by the Planning Act 2008 as a tool for local authorities in England and Wales to help deliver infrastructure to support the development of their area. It came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010.

CIL takes the form of a tariff calculated on the basis of floor-space and is only payable for certain types of development in certain locations. In East Devon, full information is contained in the council's [charging schedule](#) (adopted by Council on 20 April 2016 and came into effect on 1 September 2016).

'Infrastructure' for the purposes of CIL includes:

- Roads and other transport facilities
- Schools and other educational facilities
- Flood defences
- Medical facilities
- Open spaces
- Sports and recreational

The revenue from the levy must be used for supporting the development of an area by 'funding the provision, replacement, operation or maintenance of infrastructure'. The

[Regulation 123 List](#) sets out the infrastructure which money raised through CIL will be used to fund in whole or in part. Whilst CIL can also be spent on other infrastructure projects which are not identified on this list, it serves as a good guide as to what CIL money may be spent on. "123" refers to the Regulation within the CIL Regulations which requires the list to be produced and does not mean it is a priority 1, 2, 3 list. The [Infrastructure Delivery Plan \(IDP\)](#) provides a guide to the specific projects that are required to deliver the Local Plan (only some of which will be fund in whole or part by CIL) and the priority for their delivery.

Statement of Purpose

The CIL Working Party was set up by Strategic Planning Committee on 29 March 2017 (minute 44) and subsequently approved by Council on 26 April 2017 (minute 70). Its primary role is to consider community infrastructure funding bids received and make recommendations to the Strategic Planning Committee on Community Infrastructure Levy spend. The Community Infrastructure Levy (CIL) Member Working Party is a non-decision making body which assists and advises the Strategic Planning Committee.

Terms of Reference

1. To advise and recommend a strategy for the expenditure of the Community Infrastructure Levy.
2. Where the agreed strategy for expenditure includes a bidding process to advise and recommend a scoring criteria for assessing Community Infrastructure Levy bids.
3. Where 2. above applies to consider community infrastructure funding bids received.
4. To consider and recommend Community Infrastructure Levy spend to the Strategic Planning Committee.